

Reference: 01705596

Information Requests
information.requests@ofcom.org.uk

15 November 2023

Freedom of Information request: Right to know request

Thank you for your request for information concerning a pixel data map relating to the Shared Rural Network programme and covering grid references "J203 179" and "E 127990 N 474360" in Northern Ireland. Your request was received on 24 October 2023 and we have considered it under the Freedom of Information Act 2000 (the 'FOI Act').

Your request

"I am writing to request a detailed pixel map covering two sites - J203 179 and E 127990 N 474360 - to ensure that a new telecommunications mast is absolutely necessary when an existing operational mast is less than 1 km away.

We have been notified by our planning authority of an application to build a new telecommunications tower in BT34 3AE, off the Killowen Old Rd in the Mourne Mountains, an AONB and, as of May this year, a UNESCO-designated Geopark.

While fully acknowledging the benefits of the SRN roll-out, we are questioning the application as the proposed mast is a mere 90 metres SW from an existing operational mast whose owners are open to the concept of site-sharing. This mast has the grid reference J203 179 using the Irish Grid system.

The developers say however the existing mast falls outside of the acceptable zone of a pixel map correlated by Ofcom and "that site was not deemed to be a viable option due to the obligations of the Shared Rural Network program which requires the SRN site to be located within the 'green pixel area'." The proposed mast has a National Grid reference of E 127990 N 474360.

The pixel maps provided in the application are very low definition and given the distances involved are minimal, I am writing to see if you have a more detailed map to verify the information."

Our response

The Shared Rural Network (SRN) represents an agreement between the Mobile Network Operators (MNOs) and the UK Government to improve mobile coverage across the UK. Ofcom gave effect to the MNOs' coverage commitments under this agreement by varying their spectrum licences (with the MNOs' consent) to include the "2020 Coverage Obligations".¹ Ofcom is also responsible for

¹ <https://www.ofcom.org.uk/spectrum/information/cellular-coverage>

assessing compliance with the 2020 Coverage Obligations, and published our methodology for doing so in March 2020: [2020 Coverage Obligations – Notice of compliance verification methodology](#).

The 2020 Coverage Obligations set out certain conditions as to where coverage must be provided in order to count towards compliance. For example, in order to meet the “88% Geographic Coverage Obligation”, which falls due on 30 June 2024, “*the Licensee shall ensure that any additional coverage relative to the 2020 Baseline Coverage Footprint is either:*

(A) provided in Partial Not Spots;

(B) gained by deploying on sites located in Partial Not Spots; or

(C) gained by deploying on sites located in a Full Coverage Area, provided that any such coverage which is added in Total Not Spots does not exceed 0.3% of the geographic landmass of the United Kingdom”.

The terms Partial Not Spots”, “Total Not Spots” and “Full Coverage Area”, as defined in the MNOs’ licences by reference to the “2020 Baseline Coverage Footprint”, are correlated with a list of 100mx100m pixels. This specifies whether, according to the information that the MNOs submitted to Ofcom in January 2020, each pixel was predicted to have: (i) coverage from one, two or three MNOs; (ii) no coverage from any MNO; or (iii) coverage from all four MNOs, at the required service levels.

We are providing an extract of that pixel list for the relevant area.

Please note that more up to date information about the different MNOs’ coverage can be found here [mobile & broadband checker](#). The information contained in the pixel list (which is based on data submitted in January 2020) was submitted by the MNOs, and will be used by Ofcom, for the specific purpose of assessing compliance with the 2020 Coverage Obligations.

If you have any further queries, then please send them to information.requests@ofcom.org.uk quoting the reference number above in any future communications.

Yours sincerely

Information Requests

If you are unhappy with the response you have received in relation to your request for information and/or consider that your request was refused without a reason valid under the law, you may ask for an internal review. If you ask us for an internal review of our decision, it will be subject to an independent review within Ofcom.

The following outcomes are possible:

- the original decision is upheld; or
- the original decision is reversed or modified.

Timing

If you wish to exercise your right to an internal review **you should contact us within two months of the date of this letter**. There is no statutory deadline for responding to internal reviews and it will depend upon the complexity of the case. However, we aim to conclude all such reviews within 20 working days, and up to 40 working days in exceptional cases. We will keep you informed of the progress of any such review. If you wish to request an internal review, you should contact information.requests@ofcom.org.uk

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. Further information about this, and the internal review process can be found on the Information Commissioner’s Office [here](#). Alternatively, the Information Commissioner can be contacted at:

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF