

## Introduction on mobile coverage

### Your response

Question	Your response
<p><b>Question 1: (Section 4) Do you agree with our proposals on the coverage obligations as set out in this section? Please give reasons supported by evidence for your views.</b></p>	<p>The Countryside Alliance works for everyone who loves the countryside and the rural way of life. Our aim is to protect and promote life in the countryside and to help it thrive. With over 100,000 members and supporters we are the only rural organisation working across such a broad range of issues. The Alliance welcomes this opportunity to respond to Ofcom consultation on 'Award of the 700 MHz and 3.6-3.8 GHz spectrum bands' as mobile communications are a key concern of our members.</p> <p>The Countryside Alliance has long campaigned for broadband and mobile phone coverage to extend to all rural areas. While progress is being made, many rural communities are still experiencing poor digital connectivity. It is imperative that the spectrum auction is structured so that it can improve mobile coverage for consumers across the UK.</p> <p>Mobile devices are a vital part of modern life and in the countryside mobile connectivity is just as essential, but nowhere near as available, as it is in urban areas. Coverage is patchy and can be unreliable, making life for families and businesses very difficult. Access to voice and data services is now essential for health and safety, agriculture, tourism and rural business. A recent survey of over 1,000 Countryside Alliance members and supporters showed that 70 per cent of respondents felt digital infrastructure was the most important issue in relation to the rural economy followed by the provision of services.</p>

Continued poor connectivity in rural areas represents a huge missed opportunity for economic development and these gaps and weaknesses need to be addressed as a priority.

The Countryside Alliance welcomes the Government commitment to improving rural connectivity and tackling mobile phone partial not-spots around the country with the publication of the 'Statement of Strategic Priorities for telecommunications, the management of radio spectrum and post' in February 2019. However, the proposal contained in the consultation for 90% connectivity by 2023 is an unacceptable drop from the original proposal of 92% last year. Particularly when the Government's own digital strategy set coverage obligations of 95% by 2022. We await details on how this is going to be delivered.

The mobile network is a crucial piece of national infrastructure in both economic and social terms and should be treated as such. Increasing demand for data, especially in the light of developments in technology, such as 5G, will put demands on mobile operators from customers for improved connectivity. In addition, the Government has ambitious aspirations for improving connectivity and coverage, especially in rural areas which we feel are not matched in this consultation.

**Key points:**

- The Countryside Alliance broadly supports the proposals contained in this consultation for the proposed coverage obligations but we feel the coverage obligations could have been more ambitious and do not match the ambition of the Government as outlined in the Strategic Priorities. Consumers must be put at the heart of the decision making process.
- The proposals to extend mobile coverage to 90% is disappointing after the proposal in the original consultation was for 92% coverage. We recognise the proposals for

140,000 premises and 500 new masts could go some way to bridging that gap but we must continue to strive for greater connectivity in the countryside and all the benefits it can bring to the rural economy.

- We welcome the proposal for 500 new masts as we recognised it is imperative for rural communities to be able to benefit from modern day digital communications but there is no guarantee 500 masts will actually be delivered and as Ofcom acknowledge themselves it is at the 'conservative end of the range...'
- We are also gravely concerned that there appears to be no continuous monitoring of delivery of the 500 masts nor the coverage they are delivering. All the proposals contained in this consultation must be continuously monitored and reported on yearly.
- There is currently no proposals contained in the consultation to require the mobile operators who win the coverage obligations to report back on progress until 2024. This is unacceptable. The operators that win the coverage obligations in the Spectrum Auction must be monitored on an annual basis through Ofcom's Connected Nations Report and a debate on the floor of the house to hold the Government to account on delivery.
- The Spectrum Auction is a key opportunity to help deliver the Government's ambition of 95% geographic coverage by 2022. However, to deliver on the Government's ambitions for digital connectivity and customers' demands for service mean there is a need to build or upgrade infrastructure to tight timescales. We need to ensure that all regulatory and planning processes are fit to meet this need.

<b>Question 2: (Section 5) Do you agree that we have identified the correct competition concerns?</b>	Confidential? – Y / N
<b>Question 3: (Section 5) Do you agree with our assessment of these competition concerns, and our proposed measure for addressing them? Please give reasons supported by evidence for your views.</b>	Confidential? – Y / N
<b>Question 4: (Section 6) Do you agree with our proposal to proceed with a conventional assignment stage?</b>	Confidential? – Y / N
<b>Question 5: (Section 7) Do you agree with our proposal to use a CCA design for this award?</b>	Confidential? – Y / N
<b>Question 6: (Section 7) Do you have any comments on the proposed detailed rules for our CCA design?</b>	Confidential? – Y / N
<b>Question 7: (Section 8) Do you agree with our proposed approach to coexistence in the 700 MHz band?</b>	Confidential? – Y / N
<b>Question 8: (Section 8) Do you have any comments on the proposed licence obligation and guidance note (annex 19)?</b>	Confidential? – Y / N
<b>Question 9: (Section 9) Do you agree with our proposed approach to managing interim protections for registered 3.6-3.8 GHz band users?</b>	Confidential? – Y / N

<b>Question 10: (Section 9) Do you agree with our 3.6-3.8 GHz in-band restriction zone proposals?</b>	Confidential? – Y / N
<b>Question 11: (Section 9) Do you agree with our view that we do not need to include any specific conditions in 3.6-3.8 GHz licences to mitigate the risk of adjacent band interference?</b>	Confidential? – Y / N
<b>Question 12: (Section 10) Do you agree with the non-technical conditions that we propose to include in the licences to be issued after the award of the 700 MHz and 3.6-3.8 GHz bands?</b>	Confidential? – Y / N
<b>Question 13: (Section 11) Do you agree with the technical licence conditions we propose?</b>	Confidential? – Y / N