

## Consultation response form

Please complete this form in full and return via email to [mobilecoverageconsultation2018@ofcom.org.uk](mailto:mobilecoverageconsultation2018@ofcom.org.uk) or by post to:

Jack Hindley  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

## Your response

**Question 1: Do you agree with our proposal to impose two geographic coverage obligations and a premises obligation in the 700MHz award?**

Confidential – N

The principal of geographic targets is welcome but we feel it is unnecessary to then go on and have a premises target. We are concerned that this is over complicating the situation and creating confusion.

There is no real explanation on why the need for two different coverage (geographic/premises) obligations and what it will achieve.

We also question what discussions there have been between DCMS and Ofcom with regard to target setting. These targets feel unambitious despite central government's commitment to deliver digital connectivity.

**Question 2: Do you agree with our proposed target for geographic coverage?**

Confidential – N

We do support the principle of geographic targets but feel the proposed targets will fail to deliver the desired coverage and it raises more questions on how committed Ofcom and the government are in delivering digital connectivity.

The government have previously set targets for mobile phone coverage in the 5G digital strategy at the end of last year and the proposed ones in this consultation fall below those ambitions. How can this be? It feels like Ofcom are playing it safe on what they are trying to deliver.

We should be ambitious for delivering connectivity in rural areas and the government and Ofcom must be clear and consistent on the targets set for coverage. This difference in ambition is not acceptable.

**Question 3: Do you agree with our proposed target for in premises coverage?**

Confidential – N

We do not agree with the proposed targets for premises coverage. It seems a very strange way to deliver connectivity by targeting premises with no connectivity. We firmly believe getting the geographic coverage improved and focus on delivering that is much more important.

**Question 4: Do you agree with our proposed approach to targets for the Nations?**

Confidential – N

We are supportive of Ofcom's proposals setting targets to improve coverage in geographic areas but we do not support separate coverage targets for the home nations. This is just leaving rural Scotland and Wales further behind. If you want the UK and rural areas to be able to compete economically then they need digital connectivity which is going to match that ambition.

We also do not understand nor can we find in the consultation document on how you have settled on the targets for individual nations. We appreciate you are looking at the percentage increase for Wales and Scotland and the economic argument on the cost of roll out but there are no workings on how you settled on your approach.

**Question 5: Do you agree with our proposal that these obligations be met within 3 years of the 700MHz award?**

Confidential – N

The government in the 5G digital strategy set coverage obligations to be 95% geographic coverage of the UK by the end of 2022 so how this consultation can set geographic coverage targets for 92% by 2023 does not make sense.

It is not the first spectrum auction Ofcom have run and we would urge for the timetable to be reviewed to ensure the 700MHz award meets the 5G coverage obligations by 2022.

These proposals still leave a large geographic area not covered – we would like to know what is going to be done to connect these communities?

We should be doing more to support the rural economy and communities and this lack of connectivity between government and Ofcom is unhelpful. The countryside and rural businesses need clarity on coverage delivery not confusion.

**Question 6: Do you agree that sharing information on the location of new sites in rural areas in advance of submitting a planning notice would be appropriate?**

Confidential – N

Yes – if there is a true commitment to delivering on rural connectivity then we need to ensure there is a transparency on the location of new sites so connectivity can be maximised and that means the sharing of information in advance of planning applications.

**Question 7: Do you have any other comments?**

Confidential – N

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 'improving mobile coverage' as mobile communications are a key concern of our members.

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.

The government's ambitions for digital connectivity and customers' demands for service mean the need to build or upgrade infrastructure to tight timescales and the proposal for connectivity by 2023 is unacceptable particularly when the Government's own digital strategy set coverage obligations of 95% by 2022.

**Please complete this form in full and return via email to [mobilecoverageconsultation2018@ofcom.org.uk](mailto:mobilecoverageconsultation2018@ofcom.org.uk) or by post to:**

Jack Hindley  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA