

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

We agree that with the proposals for both geographic and premises obligations focused on both data and voice coverage.

Premises coverage is highly important to residents and businesses. We wish to emphasise that premises coverage obligations must be judged on sufficient levels of indoor coverage. This is especially true in rural areas where buildings are often made of materials that hinder propagation of radio waves and where access to fixed-line broadband can be poor. In this regard we welcome Ofcom's proposal to revise their assessment of general mobile coverage to include data and higher signal strength thresholds, as well as shifting the focus to smartphone users.

We also want to emphasise the equal importance of geographic coverage, particularly for the visitor economy which is so important in the Heart of the South West. Current gaps in coverage discourage visitors who demand ubiquitous connectivity. It also hinders innovation in the rural economy e.g. agricultural uses which are not tied to premises.

We would also like to emphasise the importance of standardising the methodologies applied to different operator's coverage models and related coverage reporting. This is essential to ensure fair comparison of coverage estimates between providers. The standardised methodology should also account for the distinct rural differences in building materials and topography, with the model parameterised accordingly. The model should not just rely on the better penetration properties of the 700MHz spectrum.

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

Confidential? – N

Whilst we welcome the inclusion of data in the geographic coverage assessment, we do not feel that 92% is satisfactory by the end of 2022. At a minimum geographic coverage should be aiming for 95% for the UK by 2020. By 2022 we would expect a target of 100%.

92% coverage will mean that significant not spots remain across rural communities. This coverage level does not seem to match the recommendations of the National Infrastructure Commission's (NICs) Connected Future report. Especially given the investment urgency NIC highlighted before 5G comes online.

This is potentially OFCOM's final chance to encourage significant levels of 4G investment by the private sector before the investment focus shifts to 5G. In the NIC's own words, 5G is unlikely to fill the coverage void - especially in rural areas - due to its much shorter wavelengths.

If we don't aim higher, we risk rural areas being left with significant gaps in geographic coverage from both 4G and 5G technologies for the foreseeable future.

We are also concerned that the 8% that remains uncovered is likely to be unequally distributed across England. The Heart of the South West is home to 2 National Parks and 5 AONBs, which makes rollout of infrastructure challenging. Operators are likely to deprioritise investment in such areas if left to their own devices. Ofcom should consider setting regional targets to reduce this risk.

<p>Question 3: Do you agree with our proposed target for in premises coverage?</p>	<p>Confidential? – N</p> <p>60% is far too low. Differences in digital connectivity are already a significant factor in inequities in economic opportunities between regions, and this disparity will only increase as the economy becomes more digitalised. There is a significant risk that some of our most rural communities are left behind. The SW Rural Productivity Commission called for a Universal Service Obligation for mobile coverage (i.e. 100% coverage) for this reason. We believe that Ofcom should adopt a similar target.</p> <p>If Ofcom nevertheless decides to aim for a lower target, it should consider weighting those premises which currently do not receive superfast broadband. Without this the same communities that lack fixed-line connectivity are also likely to be left out of 4G deployment, significantly exacerbating existing inequalities.</p> <p>We also have concerns over the methodology behind the identification of the 200,000 premises, given data errors and large-scale uncertainty over future private sector delivery. In our opinion, OFCOM still has a lot of room for improvement when it comes to deriving a realistic overview of current and future coverage, standardising model outputs and accounting for rural characteristics (as outlined in Question 1).</p> <p>There is a real risk of real life not spots being overlooked due to poor quality coverage data.</p>
<p>Question 4: Do you agree with our proposed approach to targets for the Nations?</p>	<p>Confidential? – N</p> <p>We feel that a 92% average across the UK is still far too low a target for geographic voice and data coverage by the end of 2022.</p>
<p>Question 5: Do you agree with our proposal that these obligations be met within 3 years of the 700MHz award?</p>	<p>Confidential? – N</p> <p>As a body trying to improve 4G coverage in rural areas and along transport routes, we recognise that such infrastructure investment is complex and takes time. However, 3 years seems too lenient, especially given the rapid pace of 4G deployment in recent times, and new reforms/streamlining of planning policy and the Electronics Communication Code.</p>

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

We very much welcome this suggestion but would go further, requesting that any new proposals are made available to Local Authorities through a secure portal.

Currently OFCOM provides no information on planned coverage, either because it does not possess this information, or due to NDA's.

This is a **huge hinderance** to any planned public-sector infill intervention, which under State Aid regulations must evidence market failure three years into the future.

Question 7: Do you have any other comments?

Confidential? – N

5G

We recognise that 5G is still in its infancy and that it stands to be a very different technology to 4G. We also understand that many current and proposed 4G sites may not be suited to 5G conversion - not just because of inadequate backhaul - but also limitations imposed by the laws of physics (higher 5G frequencies traveling over far shorter distances than 4G).

It would still seem logical however, to put criteria on providers to ensure 5G readiness of infrastructure for certain 4G sites. In this regard, we would suggest an assessment is made for each upgraded, or newly proposed, 4G site.

For example, there could be simple modelling done using likely 5G frequencies at each 4G site. If such models suggested significant potential coverage of roads and premises, it should be a requirement that 5G readiness is provisioned for with regards to upgrades to backhaul and allotted future mast space.

We would however advise against blanket 5G readiness being a requirement, as laying suitable 5G backhaul to some 4G sites may increase costs significantly, preventing much needed investment in 4G where 5G is unlikely to be suitable (due to limitations imposed by the laws of physics).

Coverage of key transport routes

We feel there should be some requirement to cover key transport networks (especially railways). The licence should also require operators to leverage the open access masts being installed by the Emergency Services Network, in order to gain broader coverage from a range of operators along key transport routes.

Data transparency

We believe that Ofcom should strengthen requirements on MNOs to divulge their actual coverage and plans for investment.

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

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