

Your response

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<p>Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2025/26?</p>	<p>Confidential? – N</p> <p>This response solely focuses on the Scottish Government's interests in relation to digital connectivity.</p> <p><u>Mobile Coverage</u></p> <p>The Scottish Government welcomes Ofcom's plans to improve the accuracy and reliability of mobile coverage data.</p> <p>There is significant anecdotal evidence that coverage, as reported on Ofcom's checker, does not always match the real-world experience, particularly in rural areas, so we are keen that Ofcom considers all appropriate measures to improve the quality of this data at an appropriate geographic granularity and how this data can be presented in a meaningful way to the public.</p> <p>We urge Ofcom to assess the effectiveness and viability of incorporating crowdsourced methods of collecting data into a national model of publicly available information. This could include some of the methods being trialled by local authorities, such as using sensors on bin lorries. Working with the Scottish Futures Trust, we have supported these trials and would welcome further dialogue with Ofcom to ensure that outputs can inform the emerging national coverage picture.</p> <p>Ofcom should go further and not just collect raw data on coverage but consider what constitutes "useable" coverage in today's data-rich world, and how that data can be meaningfully communicated to the public. In this context, we urge Ofcom to revise the mobile connectivity data made available to government bodies via the</p>

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	<p>named access framework, with the aim of focusing on quality and useability of signal rather than just coverage.</p> <p>We welcome Ofcom’s plans to support MNOs during 2G/3G switch off and protect customers from harm. We are concerned that 2G/3G switch off, whilst necessary, has the potential to lead to the anomalous position of reduced coverage, or growing notspots, in certain areas. We urge Ofcom to undertake analysis of where this might occur and consider what action it can take with the MNOs, potentially requiring them to ensure that no new notspots are created following 2G/3G switch off. As a minimum, we would expect that 4G would be available where 2G/3G has been switched off.</p> <p><u>Satellite-Based Services</u></p> <p>We welcome Ofcom’s plans around satellite-based services and in particular, the intention to develop a regulatory framework on direct-to-handset mobile connectivity. We acknowledge that the importance of space strategy is called out in Ofcom’s specific Scottish priorities and endorse the view that the rapid advances in LEO technology and proliferation of networks has significant potential to enhance connectivity services for people across Scotland, and potentially to enable extension of mobile and wireless services in a cost-effective way in the hardest-to-reach areas. We are following this agenda closely and would welcome ongoing dialogue with Ofcom as we consider the full implications of satellite-based services on future Scottish Government policies.</p> <p><u>Spectrum Policy</u></p> <p>We welcome the continued prominence of spectrum in the Plan of Work – in particular, the spectrum implications for the further development of space services and technology innovation more generally to support mobile and wireless communications, which has the potential to improve coverage and quality across Scotland. We are</p>

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	<p>conscious that Ofcom has done considerable work in the last few years to implement a more flexible and pragmatic use of spectrum, but we would be keen to see what more the regulator can do to drive greater usage of previously liberalised spectrum for innovative purposes.</p> <p><u>Telecoms Access Review</u></p> <p>Widespread access to digital connectivity can enable all parts of Scotland, including our rural and island communities, to fully realise their economic, social and environmental potential.</p> <p>Through our investment via the Reaching 100% (R100) programme, and the emerging delivery of Project Gigabit in Scotland, the Scottish Government is doing all we can to extend access to future-proofed digital infrastructure beyond the scope of commercial delivery, despite relevant legislative and regulatory powers being reserved to UK Ministers.</p> <p>However, while the above programmes are channelling significant levels of public investment in broadband infrastructure, a disproportionate number of gaps in gigabit-capable connectivity will remain in Scotland, given our unique geography when compared to the rest of the UK. So that those in the hardest to reach areas are not left behind, we are hopeful that any future changes to the UK's regulatory regime will go further in supporting the closure of those disproportionate gigabit coverage gaps.</p> <p>We urge Ofcom to adopt an approach to the Telecoms Access Review which focuses on the connectivity needs of Scotland's rural communities, where the challenges associated with ensuring the availability of high-quality digital infrastructure are most acute.</p> <p><u>USO</u></p>

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	<p>The broadband Universal Service Obligation (USO) has had limited impact in Scotland to date. With the USO review threshold now being triggered, there is a real opportunity to reshape the USO by increasing the minimum service level and associated funding cap, allowing it to be more effective in Scotland. Any changes to the USO must also be mindful of any emerging thinking around the approach for connecting premises considered 'very hard to reach' for the purposes of Project Gigabit.</p>

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