

Ms Ruth John
Ofcom
Riverside House,
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SE1 9HA

21 March 2013

Dear Ms John

**Countryside Alliance response to Ofcom consultation on
‘Measuring Mobile ‘Quality of Experience’’**

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 we are the only rural organisation working across such a broad range of issues.

The Countryside Alliance welcomes this opportunity to respond to Ofcom’s consultation on ‘Measuring Mobile Quality of Experience’ as broadband and mobile communications are a key concern of Countryside Alliance members. We believe the recent auction of the radio spectrum provides a huge opportunity for all the mobile companies to provide better broadband and mobile services at competitive prices. The quality of mobile coverage and the large number of not spots in rural areas causes a major frustration to our membership. In this digital age it is important that rural communities have equal access to coverage and an equity in service compared to urban mobile phone users.

The Countryside Alliance believes reliable and affordable mobile and broadband is imperative for competitive and successful enterprises in a growing digital economy. It opens up new ways of conducting business. More people will be able to work remotely from rural locations, which will ease congestion on the transportation network and contribute to a reduction in emissions. It will also lead to growing daytime populations in rural areas, aiding other rural businesses and service providers.

With more and more people accessing the internet through their smart phones we are in danger of seeing rural communities marginalised due to lack of coverage and the key government policy to increase the use of online resources for public services fail. Online access to public services will only work if they are accessible to all and do not exclude those in remote areas, who already struggle to access many public services. For example rural and farm businesses are often excluded as they are unable to access and return data online due to the lack of suitable broadband connection. HMRC expect tax returns and PAYE to be completed online. If you do not have broadband then you are expected to use an agent, which is a significant cost for rural businesses. This is why we are fully behind the drive to improve the quality and coverage of mobile services in the countryside.

The Countryside Alliance has only responded in a general capacity to this consultation as we are not an expert in the technical aspects of measuring mobile coverage, but we fully support the concept of measuring the 'Quality of Experience' and would like to see this carried out independently of the mobile networks.

Countryside Alliance key points

- Mobile and broadband connectivity is a key component of national infrastructure and should be treated as such.
- The Alliance is concerned that the lack of mobile and broadband provision in rural areas is holding back the countryside both economically and socially.
- Government policy should concentrate on a high spec infrastructure and coverage not speed. This will ensure rural communities are included as part of the national infrastructure.
- The Alliance is concerned that there is insufficient and accurate information about the level of coverage in rural areas. This is important – consumers in the countryside need to be able to make informed choices about which is the best operator to meet their needs. Mobile devices are part of everyday life and consumers are paying for a service which all too often falls below what is promised.
- Consumers are relying on operator coverage maps. We do not believe they give a true representation, which is why we have been working with RootMetrics to help provide independent data to ensure consumers can make an informed choice on which operator to choose.
- Currently there is no real commercial driver for MNO's to work to improve network performance.
- With 4G being rolled out across all networks this summer demand for coverage and increased connectivity will be at a premium. However, there is no independent data to monitor network quality or level of service.
- The Alliance believes Rootmetrics and other similar Apps could provide a low cost and viable method of monitoring the mobile networks.
- These Apps provide comprehensive, operational quality of service data of mobile phones. The Apps continually records network metrics – including signal strengths, cell handovers and call success/failure – all correlated to the user's precise geographic position using GPS.
- The crowd sourcing of actual performance data through the monitoring App rather than using network operators predictive data, will not only enable comparisons to be made in network quality of service but will assist in the development of future UK Telecoms policy. The key advantage of crowd-sourcing, in the context of network coverage and performance, is that the UK will have a data source that is relevant to almost the entire population and it is constantly updated.

If the Countryside Alliance can be of further assistance or you require any clarification of the points raised, please do not hesitate in contacting me.

Yours sincerely,

Barney White-Spunner

Sir Barney White-Spunner KCB CBE
Executive Chairman