

Digital Connectivity Forum Response to Ofcom's discussion paper: “Connectivity you can count on”

July 2026

About the Digital Connectivity Forum

The Digital Connectivity Forum (DCF) is the UK Government's primary advisory group on the provision of seamless digital connectivity. We are an expert advisory forum for the entire digital connectivity sector. Through collaboration, evidence-building and research, we make recommendations to Government, regulators and industry.

First established in 2001 as the Broadband Stakeholder Group, our diverse network today includes telecoms operators, equipment manufacturers, internet service providers, mobile network operators, tower and neutral host infrastructure providers, content producers, broadcasters, business groupings, central and local government, the devolved administrations, Ofcom and others.

Because our membership spans the full value chain - from mobile network operators through to passive and neutral host infrastructure providers - our members do not always share a single view on every question raised in the paper. This response therefore sets out the areas where there is broad consensus across our membership. We have focused on the questions where the DCF's cross-sector vantage point can add the most value.

Introduction

The DCF warmly welcomes the publication of this discussion paper, and the open, engaged manner in which Ofcom has approached it. We would be glad to support Ofcom's engagement further, including by convening our members around the issues raised.

We strongly support the paper's central move: shifting the debate from coverage - whether a signal is nominally present - towards quality, reliability and the real-world experience that people and businesses actually receive. Mobile connectivity is now core national infrastructure and underpins economic productivity, public service delivery, digital inclusion and transport, and increasingly the data-intensive and AI-enabled applications on which future growth depends. This therefore means that its quality and reliability is a first-order economic issue, not only a consumer one. Defining what “good” means, and measuring outcomes rather than simply the presence of a signal, is a genuinely useful step forward, and provides a common framework against which performance can be judged and tracked over time.

We also endorse the paper's recognition that delivering better mobile connectivity will require a shared national effort. No single party can deliver the ambition alone: it will depend on coordinated action by mobile network operators, infrastructure and neutral host providers, central and local government, landlords, developers and others. Our members are keen to play their part.

As the DCF set out in its recent response to the Mobile Market Review, delivering this ambition will depend on the conditions for sustained investment. Investment is still taking place, but operators are increasingly having to prioritise keeping networks running, managing traffic and preserving coverage over the more ambitious, capacity and quality-led upgrades this paper envisages. Sector-specific costs, such as spectrum fees, energy, security and resilience obligations, planning constraints and wider compliance, may each be justifiable in isolation, but their combined effect on the investment case can be material, and we would encourage Ofcom and government to assess that burden in its totality. Equally, and as we argued in that response, this is not only a question of cost-side pressures but of how available capital is being deployed, and whether enough of it is flowing into the capacity, density and quality-led improvements the UK needs. Because tower and neutral host companies now provide a substantial and growing share of the UK's physical infrastructure, backed by long-horizon capital, any such assessment should look across the whole value chain rather than at mobile network operators in isolation. We would add that Ofcom does not currently publish deployment and investment information at a level of granularity that would allow this distinction to be tested in practice, and greater transparency here would help to ground the debate in evidence.

Our Mobile Market Review response also drew a distinction we consider relevant to this paper: between asking the sector to deliver commercially viable investment and asking it to underwrite broader national objectives. The latter may well be the right policy choice, but it should be recognised as a public-policy decision rather than treated as a purely market-led outcome - a distinction that bears directly on several of the paper's focus areas, from in-building coverage and transport corridors to the hardest-to-serve rural locations. We would also encourage fuller use of demand-side levers, including strategic public procurement and anchor demand from public bodies, transport operators and essential service providers, to reward performance and de-risk quality-led investment. The Shared Rural Network has shown that can work where a clear objective is paired with a practical funding model.

Finally, two overarching points recur across our membership. First, the framework is understandably consumer-centred, but members would welcome greater recognition of the needs of business and enterprise users, and a clearer link to Ofcom's growth duty and the Government's growth mission - high-quality, high-performance connectivity is increasingly an input to economic activity, not only a consumer amenity. Second, members are keen that this work is closely aligned with the Government's Mobile Market Review and wider DSIT policy, so that industry is not asked to respond to overlapping or divergent asks across parallel processes.

Section 2: The quality of mobile connectivity we want to see

A defined standard and benchmark are a welcome step

Members broadly welcome the introduction of a defined performance standard - the good performance metric surfaced through Ofcom's Map Your Mobile tool - and a benchmark for how often it is achieved. Establishing a clear reference point for "good" moves the debate on constructively, and gives industry, government and consumers a shared language for discussing

performance. Our members support the principle of a transparent, outcome-based diagnostic that can be tracked over time.

The calibration of the good performance metric and 90% benchmark

The good performance standard (5 Mbit/s download, 1.5 Mbit/s upload, 50 ms latency) represents a reasonable floor. It reflects the level of performance needed to support the everyday apps and services most people use on the move. However, this standard should not be considered as a target or 5G ambition in its own right. Other nations including France and Germany have more ambitious, output-focused targets, and there is a risk that the UK will fall behind international competitors if it sets a standard at a lower ceiling than other nations. The thresholds broadly describe the requirements of today's mainstream consumer applications rather than the demands of high-performance 5G, enterprise use, or the emerging applications (such as advanced logistics, connected mobility and AI-enabled services) that a modern network should support.

A single, uniform figure set at this level risks anchoring ambition too low., A more ambitious and/or tiered and contextualised approach - in which the expected standard varies by geography and use case, for example between dense urban centres and remote rural areas - would better reflect where high performance is genuinely needed and would set a more stretching ambition where it matters most. International standards, such as those developed by the ITU in Report ITU-R M.2410, could offer a neutral and internationally recognised starting point for defining what such tiers might look like in practice.

The DCF's members are wary of a single uniform figure being treated as an end in itself - whether because of the risk of it becoming a uniform mandate, or because a single figure cannot capture the differing performance that different places and uses require. The DCF's collective recommendation is therefore that the standard and benchmark are most valuable as a transparent diagnostic and tracking tool, and that Ofcom should be explicit about that framing, resist any drift towards uniform mandating, and keep open the question of whether differentiated expectations (by geography and use case) would better serve the ambition.

This reflects the position the DCF set out in its Mobile Market Review response: that “good” connectivity should increasingly be defined in terms of outcomes - basic accessibility in some contexts, and reliable capacity, low latency, strong uplink performance or the ability to support enterprise and public-service applications in others - and that a single national measure is unlikely to reflect this diversity of need.

Aligning with the AI Growth Zones

One specific opportunity is worth drawing out. As we noted in our Mobile Market Review response, the connectivity criteria published for the Government's AI Growth Zones appear to define reliability in largely binary terms, without explicit performance thresholds. Aligning those criteria with the outcome-based quality framework this paper proposes would sharpen the industrial-strategy case for investment and ensure the two workstreams pull in the same direction.

The international benchmark is a moving target

The DCF notes that the ambition of moving the UK from the bottom third to the top third of the OECD is measured against a frontier that is itself moving. Peer economies continue to invest in and improve their networks, so a benchmark calibrated to today's top third may not represent the top third by the time it is achieved. We welcome Ofcom's own acknowledgement of this point and recommend that the standard and benchmark be kept under regular review and be explicitly indexed to international performance over time, rather than fixed at a single point-in-time level.

Measurement methodology and data

Because both the metric and the benchmark are, in practice, surfaced through Map Your Mobile and the crowdsourced data underpinning it, the credibility of the whole framework depends on that measurement being sound. Members support the use of crowdsourced data to reflect real-world experience but highlight some limitations that Ofcom should be transparent about and work to address. Crowdsourced measurement necessarily reflects where people already attempt to connect, and so may understate problems in areas where coverage is absent altogether. Members also raised the currency of the data - a rolling twelve-month window can lag rapid network change - and its granularity, noting that some other European regulators measure performance at a more granular level. We recommend continued transparency on the Map Your Mobile methodology, and that Ofcom explore more timely and more granular measurement as the approach matures, including how emerging layers such as satellite direct-to-device are reflected.

Section 3: Market-led improvements and consumer information

The DCF agrees that competition on quality, supported by better consumer information, is an important lever, and that clearer information can strengthen incentives to invest. As the DCF argued in its Mobile Market Review response, giving customers information they can understand and act on is one of the ways to move the market beyond a narrow focus on consumer price and towards rewarding performance, resilience and quality; better information is therefore not only a consumer-protection measure but a driver of the very investment Ofcom wants to see. We also agree with Ofcom's central judgement that, while the VodafoneThree merger and the wider competitive responses it is prompting (for example investment programmes announced by other operators) will drive material improvements in network quality, the merger alone will not close the gap to the ambition. Further action by Ofcom, government and others will be needed.

Map Your Mobile

The DCF welcomes Map Your Mobile as a positive first step and supports its continued development. To be most useful and to sustain trust, the DCF's members would like to see: more timely data, to avoid the risk that consumers are shown information that is out of date or misleading; greater transparency on the underlying methodology; more granular reporting; greater transparency on the underlying network capability available in an area - for example the technology generation (4G, 5G non-standalone or 5G standalone) and the spectrum bands in use - so that consumers and Ofcom can distinguish between networks on more than a single pass or fail score; and, over time, the incorporation of new connectivity layers (such as satellite direct-to-

device) as they mature. The overriding point from members is that a consumer-facing comparison tool must present a fair and current picture if it is to drive the behaviour Ofcom intends.

Section 4: Connectivity in busy urban areas

Barriers

Members identify three closely related barriers to better urban performance:

- **Planning.** The wide variation in refusal rates between local planning authorities - particularly for prior approval - creates uncertainty, cost and delay, and makes it harder for operators to plan upgrades. The narrow scope of the prior notification route, and the additional constraints in protected areas, compound this.
- **Site availability.** Finding suitable sites in dense urban environments is difficult, and urban regeneration and notices to quit can remove sites faster than they can be replaced.
- **Densification.** Delivering the ambition in busy areas will require genuine network densification and bringing networks closer to users, not solely upgrades to the existing site estate.

Members also note, consistent with our Mobile Market Review response, that early clarity on future mid-band and upper mid-band spectrum availability will be important for sustaining urban capacity and the UK's longer-term competitiveness, and that fragmentation or prolonged uncertainty in globally harmonised bands risks raising deployment costs and weakening the investment case.

Planning reform is a clear DCF priority

There is strong consensus across our membership that planning reform is critical to unlocking better urban connectivity. The DCF has a long-standing track record of engagement on planning for digital infrastructure, and we welcome the DSIT/MHCLG review of the planning framework in England. We support targeted reform, including expanding permitted development rights for lower-impact deployments, extending the temporary relocation period following a notice to quit, and clarifying the relevant tests under Part 16 of the General Permitted Development Order. We recognise the legitimate role of protected-area designations and are not arguing for these to be set aside, but for greater consistency and speed within the framework.

The infrastructure layer and international comparators

Members note that the ambition depends on the physical infrastructure being in place to support it, and that the role of shared, passive and neutral host infrastructure providers should be recognised alongside operators' own investment as part of the delivery model. International comparators are instructive here: several European markets have pursued more active densification and infrastructure-sharing trajectories, and members consider there is value in Ofcom drawing on this evidence as it develops its work. We would be glad to help Ofcom convene the relevant parts of the value chain on this.

Ofcom's role and information for local authorities

Members see Ofcom's most valuable contributions as convening stakeholders, publishing consistent local performance data, and shining a light on good practice by local authorities. Local

and planning authorities would benefit from accessible, granular local performance data; benchmarking that helps them understand their own planning performance relative to peers; and practical guidance on how they can use their own assets - buildings and street furniture such as lampposts - to enable better connectivity.

Section 5: Connectivity in indoor, shared places

The DCF supports the paper's recognition that, in large and busy shared buildings, dedicated in-building infrastructure, including neutral host solutions such as distributed antenna systems, is often the best way to deliver good connectivity, rather than relying on outdoor networks to reach users inside. The Co-op Live case study is a compelling illustration, and members have their own examples of effective in-building and venue solutions.

The DCF would highlight the following barriers in these settings:

- Commercial alignment between landlords, venue operators, mobile operators and neutral hosts, whose incentives are not always aligned - building owners typically want good connectivity for everyone, while an individual operator's priority is its own subscribers.
- Building design and materials, which can block signal almost entirely where connectivity has not been designed in from the outset.
- Awareness among landlords, developers and estate managers that mobile connectivity needs to be planned into buildings.
- Procurement. Public bodies such as NHS trusts, universities and local authorities each have to design their own procurement approach for in-building connectivity, which adds time, cost and administrative burden, and slows deployment.

The DCF welcomes Ofcom's commitment to bring relevant stakeholders together and sees convening as an area where Ofcom can add real value in this space.

Section 6: Connectivity on trains

The DCF agrees that connectivity on trains is poor and that it matters for passengers, for productivity and for social cohesion. We agree with Ofcom's proposal to work with government to support improvements. The rail environment is one where the DCF's convening role, and Ofcom's, can be especially valuable, because delivery depends on so many parties acting together.

Barriers

- **Technical:** signal penetration into carriages, the speed of trains requiring frequent reconnection, tunnels and cuttings, the rural character of much of the network, and peak-time demand on busy commuter routes.
- **Commercial:** individual mobile operators' business case for investing in trackside coverage is weak, because costs are high and the wider social and economic benefits are not captured in their returns; train operating companies face their own constraints and limited ability to monetise on-board Wi-Fi.

- **Coordination and delays:** meaningful improvement generally requires operators, train operating companies, Network Rail, neutral hosts and government to act together, with the attendant risk of delay.

Solutions and Ofcom's role

The DCF sees no single solution: the right approach will vary by line and service and will combine LEO satellite backhaul (supported by recent government funding), track-to-train solutions where economic, direct-to-mobile coverage, and shared or neutral host infrastructure. The forthcoming upgrade of the rail operational communications system (to FRMCS by around 2035) represents a rare, once-in-a-generation opportunity to enable infrastructure sharing between Network Rail and parties delivering passenger connectivity and should be actively planned for now. Members are also clear that on-board Wi-Fi is not, by itself, a suitable answer to the problems identified, as it often depends on the same underlying trackside connectivity. Improving the underlying mobile coverage along the route is therefore the priority, with Wi-Fi complementing rather than substituting for it.

The DCF considers that the area where Ofcom can most help is convening the many stakeholders involved - operators, train operating companies, Network Rail, neutral hosts and government - around coherent, line-appropriate solutions. Some members have also raised, as an option meriting further exploration, the potential role of public funding and neutral host models, including whether funding mechanisms of the kind used for rural not-spots could be directed towards trackside neutral host provision. As our Mobile Market Review response argued, this is an area where the market alone will not deliver and where public backing, co-funding and demand-side commitment, including anchor demand from the public sector and transport operators, will be needed. It is best treated as a public-policy choice rather than left to commercial incentives that do not currently exist. We welcome Ofcom's commitment to consider whether additional spectrum is needed for train connectivity.

Section 7: Connectivity in rural areas

Barriers

The DCF's members recognise the familiar combination of barriers in rural areas: coverage and capacity constraints arising from reliance on limited low-band spectrum; a weak commercial case where population density is low; resilience challenges, including power outages and dependence on single base stations; and the higher relative cost of deployment. The DCF agrees with Ofcom that, while the merger, satellite and direct-to-device developments and other technological advances will help, they will not on their own resolve rural connectivity, and further action will be needed.

Solutions and outcomes

Members support Ofcom exploring the full range of options, with realism about the limits of each: spectrum sharing (recognising its constraints); neutral host and local public network models; further network sharing; and satellite and direct-to-device provision as it matures. On the last of these, and as we set out in our Mobile Market Review response, non-terrestrial services are best

understood as a valuable complement to terrestrial networks rather than a substitute for them: they extend reach and improve resilience but still depend on appropriate ground infrastructure and raise considerations of security and sovereignty. Continued targeted public intervention, drawing on the lessons of the Shared Rural Network - including that the next rural challenge is not chiefly one of extending geographic reach still further; it is one of rural infill- is likely to remain necessary in the hardest-to-serve areas.

On outcomes, members note the connection to the wider debate on the standard and benchmark discussed under Section 2. There is broad agreement that expectations in the most remote areas need to be realistic and differentiated - the full good-performance standard may not be achievable everywhere - and that it may be appropriate to define a more basic level of service that should nonetheless be available in such areas. This reinforces the value of an approach that is sensitive to geography rather than uniformly applied.

Information

Members would value granular rural performance data; transparent analysis of where gaps are likely to persist once the Network Commitment has been delivered; and openness about the findings of Ofcom's rural case study work, so that industry can engage constructively on the residual challenges.

Conclusion

The DCF welcomes this discussion paper and the direction it sets. This is consistent with the case we made in our Mobile Market Review response: that coverage ambition must now be matched by an outcomes-based definition of quality, targeted where it delivers most value and underpinned by the conditions for sustained investment across the whole value chain. We support the shift towards quality and reliability, the recognition that delivery is a shared national effort, and Ofcom's convening role across the areas that the paper identifies.

As the UK's primary advisory forum for digital connectivity, spanning the full breadth of the value chain, the DCF is well placed to support Ofcom's ongoing work - including by convening our members to explore specific questions in more depth. We would welcome the opportunity to do so and look forward to continuing to work with Ofcom on this important subject.