



2 Marylebone Road
London NW1 4DF
t 020 7770 7000
f 020 7770 7600
which.co.uk

700 MHz and 3.6-3.8 GHz award
Spectrum Group
Ofcom
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

Which? Response to Ofcom's consultation 'Coverage obligations in the 700 MHz and 3.6 - 3.8 GHz spectrum award - Ofcom's approach to verifying compliance'

Which? welcomes the opportunity to respond to Ofcom's consultation on verifying compliance with the coverage obligations in the 700 MHz and 3.6-3.8 GHz spectrum award. Good quality mobile coverage is essential for consumers and the coverage obligations are a key mechanism to ensuring this. Therefore, compliance with the obligations is crucial to ensure that they deliver the expected benefits, and real improvements in coverage, for consumers. We agree with Ofcom that the approach it takes to compliance must be clear, robust and consistent.

Verification through ground testing

Ofcom's approach to assessing compliance states that it 'may include on the ground testing'. Which? believes that Ofcom **must** include ground testing as part of assessing compliance with the obligations. While we agree that a large amount of ground testing is impractical, this type of verification is essential to ensure that the information provided by operators is accurate. The recent issues experienced with data on mobile coverage predictions provided by operators highlights how important this process is.^{1,2}

Ground testing will be particularly important for assessing compliance with the 'premises obligation' where Ofcom is minded to solely use the operators' own models of coverage. Furthermore, it is essential that when ground testing Ofcom verifies compliance across a wide range of locations across the nations, for example, both rural and urban areas and across a range of topographies.

We agree that Ofcom should continue to assess compliance with the obligations from time to time in the period after the obligations are due to be met. It is essential that Ofcom takes action if it finds an obligated operator not to be complaint and uses the full range of tools it has available to address the issue. It is essential that the coverage levels achieved by the obligations remain available to consumers, and that operators take compliance seriously.

The consumer experience

¹ https://www.ofcom.org.uk/about-ofcom/latest/bulletins/competition-bulletins/all-closed-cases/cw_01232

² https://www.ofcom.org.uk/about-ofcom/latest/bulletins/competition-bulletins/all-closed-cases/cw_01231

Ofcom will use signal strength as part of determining whether the quality of experience it requires for the obligations has been met. However, Which? believes that Ofcom must consider the actual consumer experience the coverage is providing, not just the signal strength. Which? understands that the use of signal strength as a measure can sometimes conceal issues with the consumer experience of mobile coverage. It is essential that Ofcom ensures that compliance with these obligations mean that consumers are able to get good quality mobile coverage, and are able to use their mobile for a wide range of tasks wherever they are.

Related to this, it is essential that where roaming agreements are in place, Ofcom verifies that good coverage is being provided to consumers. Ofcom must also set out the specifics of how it will check that the roaming service is seamless. This will be essential to ensure that the actual consumer experience lives up to expectations - with no disruption to calls or data sessions when moving between the home and visited networks.

For further information please contact Colum McGuire, External Affairs Manager, Which? at colum.mcguire@which.co.uk.

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