

## **Which? Response to DCMS Call for Evidence on the Wireless Infrastructure Strategy.**

### **Overview**

Which? welcomes the opportunity to respond to the DCMS [call for evidence](#) on the Wireless Infrastructure Strategy. It is important for consumers to have access to good quality, reliable connections so that they can fully participate in our increasingly digital society. As more services, such as banking and healthcare, move online it is critical that all consumers have access to the connections they need to participate in this digital world.

Which? welcomes the Government's ambition for the majority of the UK to have access to a 5G connection by 2027. We believe that it is important that the rollout of new wireless infrastructure is successful, so that consumers can access new services and enjoy the benefits that it will bring. However, consumers need clarity about when they can benefit from new connections, and they should be able to enjoy a choice of providers regardless of where they live. Initiatives such as the Shared Rural Network (SRN) are also welcome, as a way to ensure consumers across the UK have good quality mobile connectivity, but it is important that it is delivered on schedule and that consumers can benefit as soon as possible.

### **The need for good wireless connectivity**

Good quality connectivity is critical. Consumers increasingly require, and rely, on connectivity to undertake everyday tasks, such as banking and to keep in touch with family and friends. As a result, consumers expect their devices to work reliably, no matter where they are. While 4G coverage has improved, consumers can still sometimes struggle to get a good signal or have access to a choice of mobile operators.

While the Shared Rural Network (SRN) will help to address both partial and total-not spots, some will still remain even once this programme is complete. While an overview is available of the expected coverage improvements by region<sup>1</sup>, there's still a need for more clarity for consumers. Consumers need better connectivity as soon as possible. Given that the SRN is not expected to be completed for a number of years, consumers should receive greater certainty about when they will receive connectivity improvements in those areas which are due to benefit from the SRN.

As consumers use more data, the demand for better wireless connectivity is only set to increase. 5G is expected to play an important role in this wireless revolution, leading to new applications, services and trends. These new applications will also impact a wide variety of sectors from transport to healthcare, requiring widespread, good quality connectivity.

As the Wireless Infrastructure Strategy is developed it is critical that all consumers benefit from new wireless services. All consumers must be able to take advantage of the UK having world class connectivity and previous issues, such as poor coverage in rural areas, must not be repeated.

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<sup>1</sup> SRN "Forecast Coverage Improvements by Region"  
2021 <https://srn.org.uk/forecast-coverage-improvements/>

## **All consumers must benefit**

Lessons learned from previous wireless infrastructure deployments have highlighted that high density areas tend to benefit from connectivity improvements earlier in the rollout. Ofcom's Connected Nations report highlights that outdoor 4G coverage is much higher in urban areas (98-99% for each MNO), with rural landmass coverage at around 77-83% depending on the operator<sup>2</sup>. There is a risk that 5G deployment experiences the same issues as the 4G rollout, where urban and densely populated areas benefited from it first and rural and hard to reach areas were left lagging behind in terms of both coverage and choice of operators.

Which? notes that the government's ambition is for the majority of the population to have access to a 5G signal by 2027. The government should seek to set out its ambition of when the remaining areas can expect to receive a 5G signal and the steps that it will take to achieve this. Which? also recognises that this ambition is based on coverage of the population, rather than geography. Geographical coverage however, is the standard measure used by Ofcom in reporting coverage. This metric is useful as it provides clarity on the extent to which consumers will have good quality coverage when using their phone outside or on the move between outdoor locations. The government should provide clarity as to why it is using a population measure and what this means for geographical coverage.

It is critical that when the Wireless Infrastructure Strategy is developed, consideration is given to how to ensure that all UK consumers can benefit from wireless infrastructure improvements - regardless of where they live. Given the lack of commercial viability of some locations in terms of rolling out new wireless infrastructure, the government must consider how it can support the deployment of connections in those areas that are at risk of being left behind and are unlikely to be served by commercial investment.

Furthermore, the government must ensure that as part of its strategy, it engages with consumers in a meaningful way about the issues as they affect them. This consumer engagement will be valuable in understanding consumer sentiment around some of the key issues in this area.

## **Supporting the development and deployment of wireless networks**

Wireless connectivity will play a key role in serving those areas where the deployment of other connectivity infrastructure is too expensive or challenging. 5G fixed wireless access (FWA) could be a valid alternative to those premises unable to receive full-fibre broadband.

It will be important for the government to consider previous rollouts of wireless connectivity when considering the future Strategy. As noted above, for those areas which will not be covered on a commercial basis, consideration must be given as to what support may be required to ensure these areas are not left behind. In time, the government should review the SRN and how successful it has been in delivering coverage improvements. It should learn

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<sup>2</sup> Ofcom "Connected Nations: 2020" 2020

[https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0024/209373/connected-nations-2020.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0024/209373/connected-nations-2020.pdf)

from this scheme when considering support for future wireless infrastructure and how it may be able to help support the deployment of wireless infrastructure in hard to reach locations. This experience could potentially offer a blueprint for future wireless connectivity projects.

The collaborative effort between industry and government that resulted in the SRN is a good example of how stakeholders can work together to ensure network deployment and ensure that all consumers can benefit from good connectivity. These effective working relationships must be maintained as new wireless networks are rolled out.

Which? also notes that there is also existing work within government to encourage competition and investment in future networks. In particular, Open Ran could help speed up the rollout of 5G and other wireless technologies in the UK, by facilitating network deployment, reducing supply dependencies and fostering innovation.

In addition, the PSTN Bill will help address other deployment challenges, such as access to land and limitations on upgrading and sharing infrastructure. The steps set out in the Bill should help accelerate infrastructure deployment and support investment in future networks. It is important that the Bill is passed swiftly to allow operators to take advantage of these provisions to speed up and expand the rollout of wireless infrastructure across the UK.

### **Lessons from other countries**

It is important to consider the lessons learned from other countries in terms of the rollout of future wireless networks. It is widely believed that the UK is performing well in the rollout of 5G. However, in terms of shaping the future Strategy, it may also be worth considering whether the UK can learn from countries such as South Korea, Japan, China, the US and Australia who have made significant progress in rolling out 5G.

### **About Which?**

Which? is the UK's consumer champion. As an organisation we're not for profit - a powerful force for good, here to make life simpler, fairer and safer for everyone. We're the independent consumer voice that provides impartial advice, investigates, holds businesses to account and works with policymakers to make change happen. We fund our work mainly through member subscriptions. We're not influenced by third parties – we never take advertising and we buy all the products that we test.

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**December 2021.**