

Rt Hon Jeremy Wright QC MP
Secretary of State
Department for Digital, Culture, Media and Sport
100 Parliament Street
London
SW1A 2BQ

5 June 2019

Dear Secretary of State,

We are writing in relation to proposals being developed by the mobile operators for a Single Rural Network. We want all consumers to have access to good quality mobile coverage as quickly as possible. The SRN has the potential to deliver significant coverage improvements. However, there are a number of key concerns that must be addressed ahead of any agreement to move forward. We would welcome the opportunity to discuss these concerns with you as a matter of urgency.

As you know 4G has become the standard that consumers expect and is needed to deliver the many benefits of mobile connectivity. Rural businesses are driving innovation and investment in their local economy but are often held back by poor connectivity with many unable to implement new technology or find visitors are put off by a lack of coverage. To maximise the opportunities that a changing economy presents, reliable and high-quality connectivity is vital.

It is essential that the mobile operators' proposals for the SRN provide absolute certainty that these much needed coverage improvements are delivered. To do so, the SRN proposal must:

- **Ensure that the operators are legally obliged to deliver this improved coverage.** Unlike Ofcom's coverage obligation proposals, we understand that there is currently no fully agreed mechanism which will ensure operators are legally committed to delivery; this needs to be addressed.
- **Ensure delivery of improved coverage as soon as possible.** The operators' current timetable suggests 88% coverage by 2024 and 95% geographic coverage by 2026. Particularly if these targets are backloaded, this is too slow to ensure rural businesses and communities quickly benefit from improvements in connectivity. Consideration must be given to implementing interim coverage targets to ensure continued improvements.
- **Set out monitoring arrangements by Ofcom** to ensure that the coverage improvements are being delivered on time and progress reported in a transparent way. Ofcom must take enforcement action if the targets are not met. Furthermore, Ofcom must have the powers to mandate rural roaming if necessary, as an alternative way to improve coverage, if commitments to deliver the SRN are not being met.
- Include **a requirement on the operators to publish a rollout plan** detailing where coverage will be improved, and by when, every 12 months. Currently rural communities and businesses have no knowledge of when improved 4G coverage will be delivered in their area because of a lack of transparency about roll out plans. This lack of certainty in turn has a significant negative impact on welling of rural communities and business investment. In particular, if the SRN proposals include plans for a demand-led approach

for achieving 95% coverage, clarity must be provided about how this will work in practice. The process must be transparent and straightforward for consumers.

Without these safeguards, consumers are reliant on the operators' goodwill to deliver improvements in rural coverage. This cannot be relied upon, and risks leaving the rural urban digital divide to further widen. Alongside these safeguards, consideration should be given to ensuring that the funding arrangements for the SRN provide adequate long term certainty for industry to make these investments in coverage improvements and to ensure that they deliver for consumers, at least possible cost.

It is vital that whatever policy measures are put in place to secure improvements in rural coverage, these must deliver for rural communities.

We look forward to hearing from you about how we can ensure that the opportunity to improve coverage is not missed and truly delivers coverage improvements for consumers.

Yours sincerely,



Tim Breitmeyer
CLA President



Graham Biggs
Chief Executive Rural Services Network



Stuart Roberts
Vice President NFU



Tim Bonner
Chief Executive Countryside Alliance



Caroline Normand
Director of Advocacy Which