



## **Ofcom Plan of Work 2025/26**

### **Cellnex UK Response**

**January 2025**



## Cellnex UK Input

Cellnex UK welcomes this opportunity to provide input to Ofcom's plan of work for 2025/26 and looks forward to continuing our collaborative engagement with Ofcom on a number of topics.

We note the wide and diverse portfolio that Ofcom is now accountable for and as a consequence the expansive nature of the proposed 2025/26 plan of work. Based on our business focus and areas of market participation, as described in Annex 1, we make observations and provide input on two out of Ofcom's four focus areas.

### Response Summary

Overall Cellnex UK welcomes the 2025/26 plan of work Ofcom and believes the identified activities and objectives will support progress across the relevant focus areas. We encourage Ofcom to also consider the following four key points which we expand further upon in our response:

- Improved mobile coverage and performance reporting could considerably increase the efficiency and impact of wireless infrastructure deployment across the UK
- Wider engagement with the wireless telecoms value chain, which now includes a diverse range of stakeholders with different roles, challenges, opportunities and investment criteria, is critical
- Future spectrum release and associated auction artifacts need to ensure actual physical network deployment occurs for societal and economic benefit to be realised
- Work to achieve spectrum release for utilities should be an explicit part of the 2025/26 plan of work

## Internet and Post We Can Rely Upon

### *Improving Mobile Coverage and Performance Reporting*

- We continue to believe provision of higher quality and more accurate network performance information would deliver considerable benefits to consumers and also participants in the wireless value chain
- Neutral host providers, as significant investors in the wireless value chain, rely upon multiple mobile network operators ('MNOs') utilising their deployed solutions to achieve a return on their business cases and enable continued investment
- Provision of more accurate coverage and performance information, potentially in a different format and/or level of detail to that provided to consumers, has the potential to significantly enhance the economic and environmental benefit neutral hosts are able to deliver
- We therefore encourage Ofcom to engage with the wider wireless value chain as part of its activity in this area

In addition and in line with the recent government askrequest for regulators to take action to boost economic growth:

- Improving indoor coverage within the UK remains challenging with, MNOs typically requiring all systems and their own hardware to be 'fully funded' by locations; Ofcom can support achievement of improved indoor coverage by encouraging MNOs to integrate with neutral host providers solutions (e.g. Neutral Host InBuilding Joint Operator Technical Standard ('NHIB-JOTS')) and support their ongoing operation and deployment
- Ofcom should explore innovative Annual Licence Fee ('ALF') regimes with DSIT to help achieve better UK mobile service, for example using ALF receipts to fund network densification via a structure involving the whole wireless value chain.
- Ofcom should explore how regulatory requirements for network resilience to ensure connectivity can support advanced 5G use cases and also environmental benefit (e.g. from any change to macro site power backup requirements)

### *Vendor Diversification*

- Cellnex UK is delighted to be providing the infrastructure for the SmartRAN Open Network Interoperability Centre ('SONIC') labs outdoor testing facility
- Via our involvement with this and also more widely across the Cellnex Group we observe a growing difference in current intent and likely scale of open technology deployment within private vs. public networks

- Given current mid-term targets in this area (e.g. 35% of traffic via OpenRAN by 2030) we believe Ofcom should engage with MNOs and the wider value chain (e.g. installers of macro site equipment etc.) to understand status and plans

#### *Connected Nations*

- Cellnex UK notes Ofcom's intention to include an update on 'planned network deployment data'
- Depending on the type of information and level of detail provided this could, alongside improved mobile network performance information, be highly useful to neutral host providers in optimising their deployment activity and associated investments

### **Enabling Wireless in the UK Economy**

The next 12 months will be a significant period for the UK mobile sector due to the merger of two mobile network operators; likely increases in network densification requirements; continuation of the SRN programme; and potential launch of scale fixed wireless access services.

We note the majority of Ofcom's activity in this area of the plan of work is focused on spectrum release. Outside of this we would encourage Ofcom to continue to engage with the entire wireless value chain which now contains a significant number of organisations who act as enablers of wireless services through the UK.

#### *Spectrum Release – Mobile Network Operators*

- Cellnex UK welcomes Ofcom's plans to award the mmWave spectrum given the significant role these frequencies could play in mobile network densification and fixed wireless access, as has been seen internationally
- We note the upper 6 GHz band will also be suited to supporting network densification
- Ofcom should ensure, unlike the mmWave auction, that any associated auction design/licencing regime(s) for the upper 6 GHz band guarantees physical network deployment to deliver societal and economic benefits
- Ofcom should also continue to support activity with Local Authorities to make street furniture available and undertake activity (e.g. RF monitoring) to demonstrate the safety and value of small cells for improving mobile performance

#### *Spectrum Release – 1900 MHz*

- Cellnex UK is currently deploying neutral host infrastructure along the entire length of the Brighton Mainline ('BML') and three London stations to provide public mobile connectivity to rail users and local communities along the route
- To maximise impact our aim is to make this infrastructure capable of supporting the Future Rail Mobile Communications System ('FRMCS') and enable a 'clean' migration from legacy GSM-R
- Hence clarity regarding the allocation of these bands for this purpose, timescales and likely technical parameters is of particular importance to Cellnex UK
- This will enable us to ensure our BML infrastructure is capable of supporting both near term FRMCS trial/testing activity and also eventual operational deployment

#### *Spectrum Release – Utilities*

- We note the last update from Ofcom on this was November 2023, acknowledging that at this time the government was evaluating cost and options for delivery of smart grid capability
- Cellnex UK, in line with many other stakeholders in the utility and communications industries, continues to believe that achievement of net zero targets will require deployment of a dedicated wireless smart grid network across the UK and associated spectrum release
- As a result we would expect Ofcom to be continuing with activity (e.g. confirming clearance plans, developing allocation/licencing approach etc.) to ensure suitable spectrum is ready for release at the point of government direction and for this to be explicitly referenced in the plan of work for 2025/26

## Annex 1: Overview of Cellnex UK

### Cellnex Group

This response is submitted by Cellnex UK ([link](#)), part of Cellnex Group ([link](#)) which:

- Supports over 420 million mobile connections across Europe
- Operates >115,000 mobile sites today, which will grow to c.130,000 by 2030
- Is Europe's leading neutral host mobile infrastructure provider, covering 11 countries: Austria, Denmark, France, Italy, Netherlands, Poland, Portugal, Spain, Sweden, Switzerland and the UK
- Provides mobile infrastructure services, private and mission-critical networks, distributed antenna systems and small cells, and smart/IoT and innovative services
- Operates sixteen mission critical networks in Spain for emergency bodies to ensure public safety
- Has deployed forty private networks across Europe for enterprise applications
- Had an annual turnover of €4.0bn in 2023
- Is listed on the main sustainability indices, and evaluated by highly reputable international analysts such as CDP, Sustainalytics, FTSE4Good, MSCI and Standard Ethics

### Cellnex UK

We are the trusted partner of all the major UK mobile network operators, hundreds of private businesses, the emergency services, as well as the UK Government, specifically Cellnex UK:

- Is the UK's leading independent wireless connectivity infrastructure company
- Operates >9,000 mobile sites today, which will grow to >14,000 by 2031
- Has deployed over 1,000 small cells to date
- Is an indoor mobile coverage provider, most notably in the Etihad stadium in Manchester and a number of hospitals
- Is deploying contiguous mobile coverage and capacity along the 81km Brighton to London Mainline and three major stations
- Has won three DCMS 5G competitions, working collaboratively with universities and start-ups to deliver 5G innovation
- Is the infrastructure partner delivering the UK's outdoor OpenRAN test environment
- Employs around 300 people across three major UK locations – Reading, Manchester and Leamington Spa
- Has invested c.£6bn in the UK since 2016