

Mobile Market Review: Call for Evidence

Which? response to the Department for Science, Innovation and Technology's consultation on Mobile Market Review

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Summary

Which? welcomes this opportunity to respond to the DSIT [Mobile Market Review](#) Consultation. A summary of key themes and the related questions can be found below.

1. Driving Investment and 5G Ambition (Q.11)

- **Support for 5G Ambition:** We support the government's ambition for all populated areas to have access to higher-quality standalone 5G by 2030.
- **Sector-Wide Target Risk:** At present, the target applies sector-wide, which may reduce the incentive for multiple Mobile Network Operators (MNOs) to provide high-quality coverage in the same area. The government should ensure customers on *all* networks have access to high-quality 5G.

2. The value of the Mobile Virtual Operator Network (MVNO) and eSIM Markets to consumers (Q.2, Q.14)

- **MVNOs and Affordability:** The growth of Mobile Virtual Network Operators (MVNOs) and eSIMs is highly beneficial for consumers, promoting good value and choice. MVNOs consistently outperform MNOs in Which? customer satisfaction surveys (e.g., Which? Best and Worst of Mobile 2026 survey). MVNOs play a key role in reaching niche consumer segments and providing responsive customer service.
- **eSIMs and Roaming:** eSIMs are growing in popularity among consumers by offering an alternative to expensive MNO roaming passes. The government should seek a sector-wide roaming scheme to extend the benefits of "Roam Like at Home" to UK consumers travelling in the EU.

3. Defining and Measuring 'Good' Mobile Coverage (Q.10)

- **Beyond Signal Availability:** 'Good' mobile coverage must move beyond coverage availability to include accurate performance information, such as, download and upload speeds.
- **Transparency and Ofcom:** MNOs should be required to provide live performance data to Ofcom. Ofcom's 'Map Your Mobile' tool needs to evolve to capture "real-world performance" data alongside mobile coverage predictions.

4. Strengthening Consumer Protection (Q.15, Q.21, Q.26)

- **Ofcom's powers:** The government should consider whether Ofcom should be given the power to directly enforce consumer law, similarly to the CMA.
- **Prohibit Unexpected Price Hikes:** The government should work with Ofcom to strengthen protections against unexpected, discretionary price increases during a contract's minimum term. It is recommended that Ofcom update General Conditions to allow price increases *only* for changes imposed by law (like VAT).
- **Mobile Service Code of Practice:** The government and Ofcom should consider introducing a mobile service "code of practice," similar to the broadband speeds code, allowing customers to leave a contract penalty-free due to persistent issues with poor signal reliability for voice, text, or data.

5. Net Neutrality and potential consumer benefits and risks (Q.27, Q.28)

- **Zero-Rating Support:** The existing net neutrality framework works well, particularly in allowing zero-rating of websites that deliver a public benefit or provide access to essential services.
- **Network Slicing Benefits:** The ability of MNOs to use network slicing for effective traffic management (e.g., at large events) is supported, as it ensures consumers can access services during periods of high congestion.
- **Risk of Two-Tier Networks:** Concerns exist regarding future retail trends (e.g., high-speed boost add-ons) potentially leading to a "two-tier network" where baseline reliability is deprioritised, especially if net neutrality protections are weakened.

Full response

2. The mobile retail market has become increasingly diverse as connectivity delivered through eSIMs and mobile virtual network operators (MVNOs) grows. Please provide detailed evidence as to how developments in the mobile retail market over the next decade will impact:

a. Affordability of services

b. Retail market competition

The growth of the Mobile Virtual Network Operator (MVNO) and eSIM markets delivers clear benefits for consumers. In the consultation document, DSIT notes that MVNOs can "limit market-wide revenues". This framing overlooks the role that MVNOs play in reaching niche consumer segments and maximising bandwidth utilisation on MNO network infrastructure.

The MVNO market has expanded access to affordable pricing and responsive customer service for UK mobile customers. Positive sentiment is reflected in customer feedback, such as the Which? [Best and Worst UK Mobile Networks 2026](#) survey. The [survey](#) finds that among 15 mobile providers, the top eight by customer score are MVNOs. The best-performing provider overall is Talk Mobile, with a customer score of 83%, while the best-performing network provider, EE, achieved a customer score of 74%.

Over the next decade, many mobile consumers will likely continue to prioritise cost when choosing a provider. In the above survey, 48%¹ of mobile customers listed 'price' and 'value-for-money' as their top reasons for choosing a mobile network. As the MVNO market has lower barriers to entry, there has been a proliferation of smaller providers entering the market and offering competitive retail offers to consumers. The competitive nature of the MVNO market has delivered customer choice, and our mobile survey finds that across attributes such as customer service, network reliability and value for money, MVNOs consistently outperform MNOs. The value delivered to UK consumers by MVNOs means that we would hope to see continued growth and competition within this market over the next decade.

Likewise, [eSIMs](#) have grown in popularity for UK customers travelling abroad. [Ofcom](#) notes that eSIMs can help consumers save money by avoiding their domestic carrier's international roaming charges. Which? Research (W? Magazine May 2026) finds that the difference between a roaming pass with one of the big providers is far greater for popular destinations, including Turkey (£110) and Thailand (£98), compared with a 10GB eSIM (£10.39/Turkey and £11/ Thailand). Interestingly, although Ofcom finds substantial savings for customers using eSIMs when travelling to the US (average £27.29 saving), these savings are much smaller when travelling to the EU (average £0.44 saving). We discuss the issue of UK/EU roaming charges in more detail in a later question. However, where eSIMs do offer additional flexibility and savings for consumers, we hope to see their growth maintained over the next decade. Although the consultation document notes that eSIMs may place competitive pressure on MNO revenues, the major operators are also well-positioned to enter this market and offer similar services to consumers if they choose to do so.

4. Please provide detailed evidence regarding the role that the wider wireless infrastructure market, such as satellite connectivity and neutral hosts, can play in improving coverage and quality of connectivity across the UK, including the impact on:

- a. Affordability of services**
- b. Investment in the market**

The growth of the wider wireless infrastructure market could help to improve mobile coverage for UK consumers, but we believe that by 2030 satellite connectivity will complement rather than substitute for terrestrial mobile networks.

Mobile network operators are starting to offer mobile satellite services directly to consumers. [O2](#) now offers a satellite 'bolt-on' for an extra £3 per month, or as an included feature with their 'Ultimate Plan'. The satellite feature enables customers to receive a mobile signal in locations not covered by O2's terrestrial network. However, supported applications are limited. Customers connected to the satellite network can use app-based messaging and map services, but cannot make voice calls, send text messages or use data for web-browsing or content streaming. Other networks plan to enter the consumer D2D (Direct-to-Device) satellite market, with [Vodafone/Three](#) planning for customer trials in summer 2026.

The development of a D2D satellite consumer market is still at the very early stages. Adoption by consumers is likely to be constrained by data caps and limitations on permitted applications. However, in 4G total not spots (approx [4% of UK landmass](#)), satellite

¹ Which? (2026) 'Mobile Networks Survey'

connectivity, even with limited functionality, could still offer benefits. The scale of any benefits, however, are likely to be modest. [GMSA](#) estimates that D2D satellite connections could potentially serve ~0.3% of the UK population not currently covered by mobile signals. As such, we support the development and growth of the D2D satellite network, but large-scale consumer adoption may be constrained in the short to medium term.

7. Please provide views on whether the government's 6G priorities are appropriate and whether they align with the needs of UK consumers and the UK telecoms sector.

6G technology is still at an early stage, and so it is difficult to determine the extent of consumer benefits and potential uses beyond addressing partial or non-existent coverage, particularly in remote and rural areas. The [ultra-low latency](#) (<0.1ms) of 6G connections exceeds the performance required for common consumer applications such as web browsing, messaging and video or music streaming. However, future innovations in [consumer technology](#) (such as virtual reality/VR, augmented reality/AR and extended reality/XR) will likely accelerate demands for 6G, and so we welcome work to design and deploy these networks as new consumer use cases develop.

10. How should the government think about, and define, 'good' mobile coverage in relation to quality of service provided to consumers, businesses and the public sector? What steps could government take to ensure operators are able to provide this?

Access to accurate mobile coverage information is important for consumers because it enables them to compare the quality of service they can expect from different providers before committing to a contract. 'Good' coverage should go beyond measures of signal availability and also capture aspects such as performance and latency, which are relevant to common consumer use-cases such as internet browsing or content streaming.

It is important that definitions of 'good' keep pace with consumer demands and expectations. Good coverage should also encompass consistency in service and minimise or eliminate disruption to network performance.

To address this, MNOs should be required to provide data to Ofcom to facilitate easy comparison between providers on coverage. While [Ofcom's Map Your Mobile tool](#) has evolved to incorporate delayed crowdsourced data to verify network coverage predictions, it still lacks 'real-time' performance metrics from active users and MNOs. To provide a more accurate picture, Ofcom must enhance its mobile network testing capacity, moving beyond historical predictions toward capturing live performance data. DSIT should also work with Ofcom to improve the quality and reliability of MNO network performance information – expanding Ofcom's crowd-sourced data tools so consumers can see real-world performance (e.g., actual data speeds in a specific location) rather than just theoretical "outdoor coverage" maps provided by MNOs. This provides consumers with an informed basis to understand which network offers the best performance across locations where a consumer would most value a high-quality signal. Consumers will also need more information and help on solutions such as mobile signal repeaters, where necessary².

² See Ofcom advice, available at <https://www.ofcom.org.uk/phones-and-broadband/coverage-and-speeds/using-a-repeater-to-improve-indoor-mobile-phone-signal>

11. The government's current ambition is for all populated areas to have access to higher quality standalone 5G by 2030. Do you think this is the right level of ambition to support delivery of high-quality connectivity to people and businesses across the UK, and to ensure MNOs and the wider industry are able to deliver their investment plans? Please provide detailed evidence to support your answer.

We support the ambition for UK consumers to have access to higher quality standalone 5G in all populated areas by 2030.

The UK generally has 'good' levels of 4G mobile coverage, but our 5G coverage is falling significantly behind other European countries. A 2025 [report](#) examining 5G coverage in Europe estimated that the level of 5G coverage in the UK at 45% compared to the leader, Denmark, at 83%. This placed the UK 24th out of 30 European nations on the availability of 5G coverage. In addition, Open Signal's [Global Network Excellence](#) Index reports that among 'high income' nations, the UK ranks 41 out of 53 countries based on the categories: "Time on 4G/5, Excellent consistent quality, download speed."

The development of the UK's 5G network is necessary, given the benefits 5G can offer to consumers. For example, with 5G standalone (SA) smartphones no longer needing to connect to both 4G and 5G mobile towers, in turn, this can increase smartphone battery life. Phone [batteries degrade](#) over time, and so extending the duration between charge cycles can help extend battery life. In addition, 5G SA can also increase network capacity, which can be particularly beneficial in dense and crowded areas where the demands placed on networks are high.

However, one drawback of the Government's ambition is that it targets the availability of 5G from a minimum of one mobile operator in the sector. As such, the ambition represents a sector-wide target, rather than a target for each mobile network. A possible risk from a sector-wide target is that it may be met in an area by one operator, and decrease the incentive for other MNOs to provide coverage in the same area. As part of the ambition, the Government should consider how customers on all networks will have access to a high-quality 5G signal by 2030, irrespective of their mobile network.

14. Please provide evidence on how current market conditions affect consumer outcomes, and explain how this will change over time.

The Which? Mobile Survey 2026 finds that consumers' outcomes vary significantly based on the choice of mobile network provider. As such, a market that promotes good outcomes for customers enables easy comparison and switching between providers.

Generally, mobile consumers can get good deals by shopping around, and evidence indicates that mobile customers are [more likely to switch](#) mobile providers (16%) than in broadband (9%). Through [text to switch](#), the process for mobile customers to change their provider is straightforward, and consumers who are prepared to search around and compare offers from across the market can get good value for money.

Yet, although the ability to switch is technically straightforward, a significant proportion of mobile customers, 36%³, say that they have been with their provider for over six years. This may indicate that consumers face barriers to engaging in the market that have not been

³ Which? (2026) 'Mobile Networks Survey'

sufficiently addressed.

This also may also account for why challenger MVNO brands, despite often providing better value than the major network providers, have less than a [20% share](#) of the UK mobile market based on total subscriber numbers. This means that although consumers say that 'value for money' is a key consideration when choosing a mobile provider, other factors may account for customers not switching. Bundling of services is likely an important factor, with [research](#) finding that individuals bundling services are significantly less likely to change suppliers. Other factors, such as perceptions about the process being too time-consuming (cited by 26% of consumers), also play a role.

The current market conditions are likely to continue without intervention. Therefore, the Government and Ofcom must explore available mechanisms to encourage greater engagement within the market and to understand and address the structural barriers that may inhibit consumer empowerment.

15. In context of an evolving market, what additional measures could the government consider to further protect and empower consumers including from cost-of-living pressures.

DSIT should work with Ofcom to strengthen consumer protections for customers who experience unexpected price increases. We were highly [critical](#) of the unexpected price rise that O2 imposed on customers already in contract in October 2025. O2 customers on pay-monthly sim-only plans were previously told that their prices would increase from April 2026 by £1.80. However, in October 2025, O2 informed customers that, in fact, their prices would increase by £2.50. We consider this type of price rise to be unfair to customers and counter to the principle that they should have clarity and certainty about prices when they sign up to a contract.

Subsequently, the voluntary [Telecoms Consumer Charter](#) was agreed between the Government and communication providers. As of May 2026, eight communication providers had signed up to the commitments, which were aimed at improving consumer outcomes in the market. Although we support the aims of the charter, we would like to see a formal regulatory solution adopted to address fairness for customers in telecoms markets. This requires Ofcom to update the [general conditions](#) to state that the only permissible reason for providers to apply a discretionary price increase during a customer's minimum term is for changes imposed by law (e.g. changes in VAT).

In addition, current trends regarding flat-rate in-contract price rises have hit customers on lower-priced mobile contracts harder as a proportion of their overall bills, and DSIT and Ofcom should consider this point too⁴.

Another area the Government should consider relates to the redress available to consumers when they face issues with the reliability of mobile signal for voice, text or [data](#). In [Germany](#), customers are able to request a reduction in their mobile bill or the ability to leave their contract early in relation to poor mobile service. In the UK broadband market, Ofcom has developed the [broadband speeds code of practice](#). Signatories to the code agree that they will let customers leave their contract penalty-free if they experience speeds that fall below a set threshold. The government and Ofcom should examine whether a similar scheme should be introduced in the mobile sector for persistent issues with poor signal. These measures

⁴ See the latest Ofcom pricing and consumer engagement report, February 2026.

would provide consumers with the flexibility to leave their contract if they experience persistent issues while also providing an incentive for networks to invest in infrastructure improvements.

21. Please outline areas of regulation where there are risks and benefits to the UK and EU regulatory frameworks not closely aligning. Please provide detailed evidence to support your response.

We believe that a closer alignment with the EU should enable UK consumers to rejoin the 'roam like at home' scheme, or for providers to create their own schemes with the same outcome. An area where UK consumers are comparatively disadvantaged relates to their data roaming rights within the EU. In 2025, we published a [position paper](#) with BEUC (the European Consumer Council) and the [Consumer Council for Northern Ireland](#) on strengthening the UK-EU relationship for consumers.

Before the UK left the EU, UK citizens could call, message or use mobile data at no additional charge in EU countries through the '[Roam Like at Home](#)' programme. However, access to these benefits for UK consumers has ended. Now, EE and Vodafone/ Three charge customers a daily fee to use their UK allowances within the EU. At present, O2 does not impose additional charges for customers to roam within the EU. However, nothing would prevent them from following the approach of the other UK networks in the future. Charge-free EU roaming is also a competitive differentiator, with 11%⁵ of UK customers citing 'EU roaming allowance/ includes EU roaming' as a reason for choosing their mobile network provider.

The issue of inadvertent roaming can generate significant financial detriment to consumers. The UK has secured agreements on roaming charges with Iceland, Liechtenstein and Norway, but UK consumers do not benefit from similar measures when travelling to EU countries. The issue of inadvertent roaming has also impacted UK consumers domestically, particularly along the border between Northern Ireland and the Republic. In 2024, Ofcom announced [new rules](#) to ensure that consumers are informed about roaming changes and setting spending caps. Mobile providers also made [commitments](#) to treat Republic of Ireland data usage as UK usage.

Although these measures are an improvement, particularly the commitments on data usage in the Republic of Ireland, they otherwise rely on the customer taking action, which may mitigate the risks of inadvertent roaming but does not eliminate them. As such, the Government should consider the establishment of a sector-wide roaming scheme to extend the benefits of free EU roaming to UK consumers.

More generally, the continuing focus upon consumer and end user rights in telecoms contracts in the proposed [EU Digital Networks Act](#), including on tackling fraud and vulnerable consumers, is welcome, but the government should not be constrained by EU legal frameworks when there is a case to provide additional legal protections for consumers, for example, in relation to mid-contract price rises.

22. To what extent does Ofcom have the right duties and powers to stimulate long-term investment, innovation and competition in the mobile market and what

⁵ Which? (2026) 'Mobile Networks Survey'

**legislative or framework changes could be made to better support these outcomes?
Please provide detailed evidence to support your response.**

Ofcom has powers to set [general conditions](#) for mobile providers, monitor and investigate regulatory compliance and take enforcement action in response to contraventions. In our view, the Government should consider whether Ofcom should be given direct administrative powers to enforce consumer law. These powers have been granted to the CMA under the DMCCA and enable the regulator to impose direct financial penalties on non-compliant firms, rather than having to go to court. Extending these powers to Ofcom could improve the responsiveness and accountability of communication providers and ensure compliance with consumer protections such as those within the Consumer Rights Act and protection from unfair commercial practices.

One area where the scope of Ofcom's powers may warrant review is in relation to quality targets for providers. Quality of Service (QoS) targets - such as minimum upload and download speeds - could be set for providers in addition to coverage obligations reflected in licences for spectrum.

Setting quality targets could benefit consumers by improving the reliability of service while also incentivising investment in networks to meet specific quality indicators. However, we do recognise that this could involve a tradeoff between setting such standards and consumer pricing. As such, any indicators or targets would have to be designed carefully.

In the broadband sector, a decent broadband service is explicitly defined as part of the [Universal Service Obligation](#) as a download speed of 10mbps and an upload speed of 1mbps. Although [Which? has argued](#) that these specific levels are no longer fit for purpose and should be reviewed, the existence of a definition does provide additional remedies to consumers unable to access decent and reliable service.

26. What further can the government do to ensure that the regulatory framework empowers and protects consumers.

We would refer to the points made previously concerning how consumers can be empowered and protected. Including:

- Improvements to the reliability and accuracy of mobile signal coverage information (Q.10)
- Prohibition of mobile 'prices may vary' terms for pay-monthly contract customers, and the scoping the creation of a mobile service 'code of practice' (Q. 15)
- Agreement of a sector-based deal with the EU on mobile data roaming (Q.21)
- Exploring opportunities for quality of service obligations for mobile networks (Q.22)

27. What parts of the current net neutrality framework do you believe have functioned, and continue to function effectively? Please provide detailed evidence to support your answer.

[Ofcom published](#) updated guidance on how net neutrality rules should apply in the UK in 2023. Ofcom's guidance also clarified the scope and application of net neutrality rules, including those that would be relevant to consumers in relation to zero rating and the development of retail offers.

ISPs zero-rating websites has been an area that has generated consumer benefits. Zero rating can be particularly beneficial for individuals who rely exclusively on mobile data to get online and run out of mobile data on a regular basis. Zero-rating can be especially valuable where websites can deliver public benefit, such as websites to [support victims of crime](#) during the pandemic in 2020. We would be broadly supportive of a more comprehensive agreement between mobile networks and the government to widen the scope of websites eligible for zero-rating to cover access to websites required to access essential services.

We also note that under the existing framework, mobile networks have been able to allocate individual slices of 5G network capacity for specific purposes. For example, [Vodafone](#) used network slicing to support vendors in processing customer payments as part of the 2024 Glastonbury music festival. Using network slicing to deliver specialised services allows for more effective and efficient traffic management in areas with high-densities of people, such as concerts or sports events. Uses like this ensure that consumers can continue to access services when demands on networks are high. When private networks are deployed to the public for specific purposes, this can also benefit consumers by providing access to mobile data during periods of high network congestion.

28. Are there any elements of the current net neutrality framework that you think are not working well, or are no longer working as intended? Please provide detailed evidence to support your answer.

The current net neutrality framework does appear to be working well overall. However, an area where we do have concerns relates to the development of retail offers in the market. [Ofcom's 2023](#) guidance clarifies that ISPs are able to offer retail packages with varying levels of data allowances and speeds, but also differentiation in terms of other quality metrics. Generally, product positioning in the broadband market has tended to focus on speed, whereas in the mobile market, this has focused much more on data allowances. However, there have now been examples of products offered in the mobile market, such as the [Vodafone 5G speed boost](#), that are focused on high speeds as a point of competitive differentiation.

Mobile retail trends could see the development of two significant risks. There is a danger that "premium" products will be used to justify a two-tier network, where baseline reliability is deprioritised—a scenario that becomes more likely if net neutrality protections are weakened. Furthermore, such stratification adds complexity to a market which can already be [confusing and difficult to navigate](#) for consumers.

We welcome the creation of new products and services in the mobile market where they provide genuine value to consumers. However, we would be concerned if changes to net neutrality rules enabled a proliferation of new offers that position reliable and consistent service as something unique to justify consumers paying a premium price.

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