

Guidance on public call boxes

Introduction

- 1.1 BT (outside Hull) and KCOM (in the Hull area only) are the designated telephony Universal Service Providers in the UK. Under the Universal Service Conditions (“the Conditions”), they are required to ensure the adequate provision, repair and maintenance of Public Call Boxes (‘PCBs’). The Conditions also specify the approach they must take to: the removal or relocation of PCBs (Condition 3.2-3.15); the resilience of their PCBs, for example in the event of a power cut (Condition 3.17); the removal of cash-payment facilities in their PCBs (Condition 3.19); and reporting on their compliance with these obligations (Conditions 5.1-5.3).
- 1.2 This guidance sets out our expectations on how BT and KCOM should approach compliance with these Conditions. This guidance replaces the previous guidance from 2006.
- 1.3 Words and expressions used in the Conditions shall have the same meaning when used in this guidance.

Removal of a last at a site PCB

Criteria for assessing whether a Last-at-a-Site PCB can be removed

- 1.4 Under Condition 3.3 BT and KCOM may only remove or relocate a Last-at-a-Site PCB where all of the following Removal Criteria are met:
 - a) all UK-wide mobile network operators have coverage at the Site;
 - b) the Site is not a high frequency accident or suicide location;
 - c) fewer than 52 calls were made from the last at a site PCB in the 12 months prior to the start of the relevant Representation Period; and
 - d) there is no other evidence of a reasonable user need for that PCB.

Measurement of mobile coverage at the Site

- 1.5 In measuring whether a Last-at-a-Site PCB has coverage from all UK network providers, we expect BT and KCOM to undertake on-site testing at the relevant PCB in the following circumstances:
 - a) where our [mobile coverage checker tool](#) indicates that the site does not have good *indoor* mobile coverage from all UK network providers; or

- b) following a request (supported by relevant evidence¹) from a Relevant Public Body as part of responding to a consultation on a proposed Last-at-a-Site PCB removal (where an on-site test has not previously been undertaken at that PCB prior to consultation).
- 1.6 Where BT and KCOM undertake on-site testing, we expect this to involve a test of whether a one-minute voice call can be made without disruption. In assessing whether this test has been met, BT and KCOM should:
- a) undertake this test at a range of points within a 50-metre radius of the Last-at-a-Site PCB;
 - b) ensure at least five such tests are undertaken for each network operator, and the test is met at least 90% of the time; and
 - c) ensure that a typical, widely available mobile device is used to undertake the test.
- 1.7 If constraints of the geographic landscape mean that undertaking such test within a 50-metre radius is not practical (e.g. if the PCB is located by the coast, or next to an inaccessible area), BT and KCOM should take reasonable steps to secure a measurement which is as close to this test as possible, and which is objectively justified in light of any geographic constraints.

High frequency accident or suicide location

- 1.8 In assessing whether a Last-at-a-Site PCB is in a high frequency accident or suicide location, we expect BT and KCOM to take reasonable steps to identify such areas based on evidence that is available to them, which could include, for example:
- a) data on calls made from the PCB to emergency services and suicide-related helplines during the 12 months prior to the start of the Representation Period; and
 - b) publicly available data on accidents in the area (where such data shows a clear pattern of serious accidents within close proximity of the PCB);

Usage

- 1.9 In assessing whether this criterion is met, BT and KCOM can disregard calls made from a PCB where there is evidence these are hoax or nuisance calls, or indications that the PCB is being used for illegal activity. This could include, for example, if the police, emergency services or helpline providers have shared relevant evidence, or it is clear from BT or KCOM's own call records.
- 1.10 When calculating use, if the PCB has been out of working order or was inaccessible for any reason during the relevant 12 month period, we expect BT and KCOM to make a reasonable pro-rata projection for the additional calls that would have been made during the time the PCB was out of service or inaccessible (and this should include taking account of the usage and distribution of calls made in previous years where relevant).

¹ This evidence may include details (e.g. times, locations) where calls could not be made to a particular MNO in the area because of poor signal.

- 1.11 We also expect BT and KCOM to take account of usage of other PCBs within the Site that have been removed or relocated within the previous 12 months. In particular BT and KCOM should add the usage of such PCBs to the usage of the Last-at-a-Site PCB when assessing if it has met the usage criterion.

Other evidence of reasonable need

- 1.12 In assessing whether this criterion is met, we expect BT and KCOM to make a reasonable assessment of whether there is any other relevant evidence (not already captured under the first three Removal Criteria) relating to the reasonable need for the PCB. This, in particular, should include any evidence on the types of calls made from the PCB, beyond those set out under the high frequency accident or suicide location Removal Criterion. For example, if there is evidence of the PCB being used to make genuine calls to identifiable helpline numbers (such as Childline or NHS 111).²
- 1.13 We also expect BT and KCOM to give proper consideration to evidence provided by Relevant Public Bodies about local factors that are directly relevant to the need to maintain a PCB for telephony purposes. For example, this might include evidence relating to the PCB having been relied upon in the event of a local emergency, such as flooding.

Information included in notices to Relevant Public Bodies

- 1.14 Where BT or KCOM propose to remove or relocate a Last-at-a-Site PCB, they must give written notice to the Relevant Public Body. Condition 3.6(b) provides that this written notice must include all relevant evidence and other information in relation to the Removal Criteria.
- 1.15 In complying with this Condition, we expect BT and KCOM to include at least the following information in the notice:
- a) mobile coverage at the PCB, in particular:
 - i) the results of any on-site mobile coverage testing; or
 - ii) information about coverage reported in Ofcom's mobile coverage checker and the option for Relevant Public Bodies to make a request (supported by evidence) for an on-site coverage measurement to be carried out.
 - b) an assessment of usage of the PCB, including the number of calls made from the PCB in the previous 12 months, a breakdown of the number of emergency and helpline calls made, how the usage of any other PCBs within the Site has been taken into account, and any adjustments made if the PCB was out of service/inaccessible for any time during the 12-month period; and
 - c) any other relevant evidence or information BT or KCOM has relied on in assessing whether the PCB is likely to meet the Removal Criteria (for example, information on

² BT and KCOM would not be expected to include hoax emergency calls in making this assessment (where such information is known either through its own call records or feedback from relevant helpline providers).

accidents or suicides at the PCB location, or the results of any engagement it has undertaken with relevant helplines regarding that PCB prior to consultation).

Resilience of PCBs

- 1.16 Under Condition 3.17, BT and KCOM are required to take all necessary measures to ensure:
- a) the fullest possible availability of their PCBs in the event of catastrophic network breakdown or in cases of force majeure; and
 - b) uninterrupted access to calls to Emergency Organisations as part of the provision of the PCBs.
- 1.17 In complying with this obligation, we expect BT and KCOM to assess and identify the PCBs that are likely to be relied upon in the event of a power outage and which therefore require a solution to ensure uninterrupted access to emergency calls. We expect in particular that at least one PCB at a Site in areas without mobile coverage from any UK network should include such a solution. Other factors which we expect BT and KCOM should take into account in this assessment include:
- a) areas which have a history of frequent and/or long duration power outages;
 - b) high frequency accident locations; and/or
 - c) remote rural settlements.
- 1.18 In identifying which PCBs may fall under the factors outlined in the paragraph above, it may be helpful for BT and KCOM to seek guidance from Relevant Public Bodies.
- 1.19 The solution used to meet the requirements of Condition 3.17 should ensure that calls to Emergency Organisations can be made from relevant PCBs for a minimum of three hours in the event of a power outage affecting the area.
- 1.20 We expect BT and KCOM to take additional measures to ensure PCBs in areas with long-duration power outages continue to allow uninterrupted access to calls to Emergency Organisations for more than three hours where necessary (e.g. sending engineers out with additional batteries to those sites in the event of a power cut or enabling mobile generator power back-up).
- 1.21 We consider BT and KCOM should display a prominent notice on those PCBs which do not have a resilience solution installed which clearly indicates that the PCB will not function in the event of a power cut and, where relevant, gives directions to any PCBs located nearby that do have a resilience solution. For those PCBs which do have a resilience solution, we consider BT and KCOM should display a notice in PCBs stating the minimum length of that solution.

Removing cash payment facilities

- 1.22 Condition 3.19 requires BT and KCOM to reasonably assess whether there is an ongoing user need for making payments by cash before they remove the cash payment facilities from a PCB (unless the PCB offers free calls).
- 1.23 In complying with this obligation, we expect BT and KCOM to take reasonable steps to assess ongoing need for cash payment facilities and to gather appropriate evidence (which may include consultation with Relevant Public Bodies) to support that assessment prior to removing any such facilities. For example, relevant evidence could include the existing cash usage in a PCB over the last year. In particular, where a PCB has both cash and card payment facilities, if the majority of calls made from a PCB were paid for using cash, we would not expect the cash payment facility to be removed from that PCB.

PCBs reported as damaged or faulty

- 1.24 Under Condition 5.1, BT and KCOM are required to report each year on the total number of their PCBs reported as damaged or faulty.
- 1.25 In complying with this obligation, we expect BT and KCOM to take account not only of issues related to whether calls can be made from a PCB, but also whether damage to the box makes it inaccessible or unusable (and therefore effectively prevents calls from being made).