

Ofcom Consultation on Universal Service Obligation

Comments of Errol Community Council.

Q1. What should be the arrangements for funding USO in future?

ANSWER: An indirect levy on consumers via a levy on communications providers (such as is used in the USA and France);

Q2. How could competition for the delivery of USO be organised in future?

ANSWER: The possibility of auctioning off the right to deliver USO, on the basis of the level of subsidy required, is an attractive one and should be seriously considered.

Q3. Should mobile technologies be used to help address the existing USO?

ANSWER: Yes.

Q4/5/6.

No comment

Questions on Section 5 – PCBs

COMMENT: In these days of mobile phones the need for a public phone box is less important as it once was. Not everyone, however, has a mobile phone nor do they have credit on - it or indeed a signal on it at all times.

Q7. Comments are invited on the preferred approach regarding arrangements for the removal of PCBs (ie to retain but modify the existing arrangements), in particular on: the principle of delegating power to local public bodies to object to PCB removal;

ANSWER: It should be retained, but they must give reasons and it should not be an absolute veto – BT should have a right of appeal..

whether there are other bodies that could undertake this delegated power;

ANSWER: No – only elected bodies.

an amendment to the definition of “Site”;

ANSWER: The definition needs to be reviewed.

the appropriate public bodies to have the power to object;

ANSWER: The present list is appropriate.

the consultation period for the public body to object;

ANSWER: The present timescale is reasonable if measured from the date on which the body receives notification of the proposal.

factors that might be considered in guidance for objecting;

ANSWER: The need for use in emergencies and "semi-emergencies"; mobile reception; alternative provision.

the use and level of a revenue threshold

ANSWER: Probably not appropriate if a subsidy is available.

Q8. Comments are invited on the approach to defining a Universal Service PCB, in particular on:

whether the use of an algorithm would be a practical, effective, transparent mechanism for defining a USO PCB;

ANSWER: It is doubtful that it would, in fact, be so – but it is worth pursuing on an experimental basis.

and if so the factors that might be included in the algorithm;

ANSWER: The various factors outlined in this document.

whether there are other alternative methods of defining a USO PCB that could be considered.

No comment

Q9. Should the existing requirement on BT and Kingston to offer cash payment facilities in the last PCB at a Site be retained or amended? Please give reasons.

Q10. Comments are invited on the introduction of emergency and freephone call boxes. In what circumstances could they replace the PCB? Should the local public body have to consent if they are to replace the last PCB on a site?

ANSWER (to Q9 & Q10): If PCBs are little-used and are vulnerable to theft but are needed for emergency, etc. use, then it would seem to be reasonable for them to be replaced by cashless machines with freephone/emergency access. It would offer reassurance to those in the community who do not have access to either a landline nor a mobile telephone. It should, perhaps, be a condition that at there be at least one all-night taxi service serving the area with a freephone number (which would be displayed in the PCB). The local public bodies should, however, be consulted in the usual way.

Q11/12/13/14/15/16/G1/17/18.

No comment

Q19. Do you agree that the guidelines do not require substantive change but only minor amendments to improve information flows and make them clearer?

ANSWER: Yes.

Q20/21.

No comment

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