

# Milton and Coaltown of Balgonie Community Council

4 Queens Meadow, Coaltown of Balgonie, Fife KY7 6GZ

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Chairman: Andrew Piatkowski  
Secretary: Peter Ritchie

Date: 10 March 2005

Alan Pridmore  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA

Dear Sir

## **Review of the Universal Service Obligation**

The Community Council welcomes the opportunity to comment on Ofcom's review of the Universal Service Obligation.

The Community Council's main area of interest is the proposals relating to Public call boxes. The Community Council supports the 1<sup>st</sup> of the three approaches identified in the Review namely,

***Retain, but modify the current arrangements: local public bodies would keep their veto but the process would be made more transparent, accountable and consistent.***

We agree with the principle of delegating the power to veto the removal of a PCB to local authorities as this should lead to greater consistency of approach but an essential element of this should be that the local council is required to consult with Community Council and other local representative bodies in who's area the PCB is situated.

We agree that there is a case for reviewing the 100-meter definition and an increase to 300 or 400 meter does not appear to be unreasonable. However, we see no need to differentiate between Urban and Rural areas, as the ability of users to walk to the nearest PCB should be the overriding factor. It is not reasonable to assume that rural users are able to walk greater distances as this depends on individual circumstances.

The proposal to increase the consultation period from 42 days to 90 days is welcome and should allow sufficient time for consultees to take local soundings and make their views known.

We agree with the principle that objections to the removal of PCB's must be justifiable, not discriminate unduly and be proportionate to what it is intended to achieve and welcome Ofcom's plan to create guidance on dealing with proposals to remove PCBs. However we do not accept that history of vandalism or whether the call box is making money should be factors that are taken into account. If vandalism is an issue in an area the solution should include installing anti-vandal equipment. We accept that usage is a factor that must be taken into consideration and agree that there is no justification in retaining a PCB that is not used, however, usage will be influenced by the nature of the area in which the PCB is located and for example a justifiable level of usage in a remote area should be lower than that of an urban area.

I hope the above comments are helpful. I should be grateful if you could provide me with a copy of the guidance when this has been produced.

Yours Sincerely

Peter Ritchie  
Secretary

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