

West Dunbartonshire Council

Response to Ofcom's Review of the Universal Service Obligation

Question 4

Poverty and Deprivation

Currently BT offers a low price fixed line phone service, but BT is now suggesting moving to a targeted means tested scheme. The proposal is to target this low cost scheme at households with incomes of no more than £10,500 per year who are also in receipt of a means tested benefit i.e. a pension. The average wage in Scotland is around £23,000, therefore BT are targeting this initiative at those living on less than half the average annual wage. An installation fee of £74.99 would still apply with reduced quarterly line rental but with calls costing 10p per minute.

West Dunbartonshire ranks 2nd in Scotland for Income Deprived population and 3rd for employment deprived. 37% of the population live in the 20% most deprived datazones in Scotland. The Scottish Household Survey reported in 2001/2 that West Dunbartonshire Council was the worst in Scotland with 15% of households reporting some degree of financial trouble compared to the figure of 11% for Scotland. A lower proportion of residents have a bank or building society account than in other areas of Scotland and among households with savings and investments the pattern was among lower amounts.

This widespread financial hardship is also reflected in the number of people claiming Income Support, Pension Credits and Child and Working Tax Credits which are among the highest in Scotland.

Means Testing

Switching the assessment criteria of providing low cost line rental to one which includes an element of means testing would have an adverse impact on the poor, as means testing tends to reduce the number of people who apply. For the very poor especially Pensioners take up of means tested benefits is already low.

Charging Policy

On the basis of an annual income of £10,500 the Installation charge of £74.99 would account for 35% of that household's weekly income. Anyone on so small an income would find it difficult to budget or save this amount of money.

The call charge of 10p per minute also seems excessive and together with the installation fee and quarterly line rental may still put having a telephone at home out of the reach of many. In fact it may be that there are similar or better deals available using the ordinary installation and line rental fee which allows users to benefit from free or cheap call rates.

I would suggest that BT consider scraping the line installation fee for pensioners and those on low incomes, and offer reduced quarterly line rental and access to cheap calls.

Linking savings to Direct Debit payments

There is also an option of reducing the cost of line rental if the payer chooses to pay by direct debit. However, there are and still remain significant problems for some people on benefits trying to open bank accounts. There is evidence that some of the larger banks are taking as long as 4 weeks to clear benefit checks. Until this situation is sorted out, linking savings on bills to the ability to operate a bank account should be left in abeyance.

Question 7

Public Call Boxes

BT is currently reviewing the number of public payphones across the country with 1,000 targeted for removal in Scotland. There has been no indication as yet of the number that are under threat of withdrawal in West Dunbartonshire.

West Dunbartonshire has one rural postcode which takes in part of Haldane/Jamestown and Kilmarnock. In these more rural areas it might be that payphones should automatically be retained, as they remain an important emergency aid. Should for example your car breakdown at night on an isolated stretch of country road a payphone could be a lifeline?

Retaining Call Boxes in Deprived Communities

Poor people with no phone living in poor communities should retain access to a public phone. Being able to phone for a taxi to attend a hospital appointment or to summon a family member in a hurry, should not be something that should be impossible or unduly difficult. One option would be for payphones to be used as emergency phones, allowing the public to telephone the emergency services free, as well as 0800 numbers. These phones could also have a reverse charge facility which would also be helpful to people in an emergency.

Mobile Phone Use

There is some anecdotal evidence that while there is a high level of mobile phone ownership in West Dunbartonshire they are not being used to make phone calls but are used mainly to text, if this is the cheapest way of communicating. The mobile phone service in West Dunbartonshire is patchy, with gaps in service around some parts of Alexandria.

Defining a 'Site'

The definition of a 'site' should include the notion of any confined geographic area, or self-defined community, where there is a population of people with limited access to alternatives.

Right to Veto

Who in Local Government should have a Veto on whether a phone box should be removed? I would suggest that the local Councillor, the Community Council for that area or the local Community Planning Partnership would all welcome an opportunity to be part of any decision making process.

Question 11

West Dunbartonshire Council agrees that a feasibility study of a video relay service should be carried out. Along with members of the local disability community we have noted that current relay technology requires updating. A video service would also confirm BSL as the key medium for Deaf communication.

However, we do not agree that video relay would optimise the use of BSL interpreters. Rather, it would add to demand on an already scarce resource. This issue should be addressed in parallel with any development of a video relay service.

Question 12

The Council agrees that a Stakeholder Advisory Panel would have a potentially useful role in the development of the relay service. We do not comment in detail on possible terms of reference but would make two general points. First, that among a wide range of 'stakeholders', Deaf people should have a central role on the panel. Second, that the DDA requirement to provide equality of service should be a fundamental goal.

Question 13

We support the proposal for publication of an annual plan and report, as contribution to transparency and customer participation.

Question 14

The Council believes that mobile/email access should be pursued, particularly the development of email. We acknowledge the obstacles that have been cited, but believe that web-based contact would be a major advantage for Deaf people, for example in contact with complex organisations such as local authorities, which find it difficult to utilise textphones effectively.

Question 15

We do not agree that option 2 – consultation on the design of public telephone boxes – offers the best opportunity for improving accessibility. Consultation is important, but should be part of a much firmer commitment to accessible PCBs.

Question 16

We agree that the obligation to provide paperwork in acceptable formats should be redefined to apply to all subscribers who are not able to read print.