

Commission for
Rural Communities
Tackling rural disadvantage

Date 28 September 2005

Our Reference XXXXXX
Your reference XXXXXX

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28 September 2005

Dear Mr Pridmore

REVIEW OF THE UNIVERSAL SERVICES OBLIGATION

The Commission for Rural Communities welcomes the opportunity to respond to the Review of the Universal Service Obligation.

The Commission provides well-informed, independent advice to government and ensures that policies reflect the real needs of people living and working in rural England, with a particular focus on tackling disadvantage. Its three main functions are to act as rural advocate, the voice for rural people, businesses and communities; expert adviser, giving evidence-based, objective advice to government and others; and independent watchdog, monitoring and reporting on the delivery of policies nationally, regionally and locally.

Our comments are as follows:

Affordability

We welcome the proposed new low cost scheme, aimed at people who receive Income Support, or pensioners who receive both Pension Credit and Housing Benefit. Our report, *The State of the Countryside 2005*, shows that there are over 370,000 people living in rural areas who claimed income support in 2003, equivalent to 11.1% of all claimants.

We are also pleased to see that BT has now proposed an early payment discount which will benefit customers on low income without a bank account or who are reluctant to use direct debit.

Public Call Boxes

We consider that the proposed change of the definition of a site to any area within walking distance of a PCB from 100 to 400 metres should be a maximum distance, which corresponds to 5 – 10 minutes walk.

The Commission agrees that adequate coverage is best determined at a local level. However, we note that it is proposed that the local veto should be restricted to unitary, county council or equivalent level, with other public bodies, such as parish and rural community councils, continuing to be consulted. It is very important that these local consultations should be carried out and their views taken on board in order for the concerns of communities to be taken into account. We are pleased to note that it is proposed to extend the consultation period from 42 days to 90 days.

The guidance to be published by Ofcom on issues to be considered by local public bodies when appraising requests for PCB removal should also include:

- Rurality of the area. Information on different types of rural settlement can be found on the ONS website. www.statistics.gov.uk/geography/nrudp.asp.
- Geography and topography of the area

On cashless PCBs we agree with Ofcom's view that public bodies should be consulted by BT and Kingston on an informal basis before conversion to cashless call boxes takes place. However, we would be concerned if the new arrangement discriminated against disadvantaged people in rural areas who may have less access to bank and credit card accounts.

We are pleased to note the proposal to hold a one-day event to bring together call box providers and groups representing people who have disabilities to discuss the design of call boxes in the future.

Internet access

We agree that the current guidelines should emphasise that functional internet access should involve the provision of optimal speeds and that 28.8 kbps is a benchmark minimum speed and that providers should submit to Ofcom quarterly reports on details of work relating to improvements to the network to deliver functional internet access, including average final connect speeds of customers. This will allow BT to concentrate on investing in important areas such as broadband and next generation networks.

I enclose a copy of *The State of the Countryside 2005* (www.ruralcommunities.gov.uk/article.asp?aID=56&pID=1) and *Taking forward our study on rural disadvantage* (www.ruralcommunities.gov.uk/article.asp?aID=61&pID=1), a summary of responses to our first thematic study of rural disadvantage, which I hope you will find of interest.

Yours sincerely

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Policy Adviser

