

**Response to the Review  
of the Universal Service  
Obligation  
(Extract – Public Call Boxes)**

**September 2005**

## **Introduction**

Stretching from the Eastern edge of Edinburgh to the North Sea, East Lothian is home to around 90,000 people. The population is concentrated around the six main towns (the largest being Musselburgh with a population of 22,000) with the remainder living in small rural towns and villages. In such a sparsely populated area, the rules regarding the provisions of public call boxes are of particular importance to many of the people in the area.

East Lothian Council is a Labour-led administration, based in the town of Haddington, and employing almost 4,500 people. As an organisation we have an interest in the provision of public call boxes for two main reasons: a) They are an important resource used by the people we serve, and b) Under the new proposals, it would be unitary councils such as ourselves able to prevent the removal of certain public call boxes.

**Q2: Definition of a Site** - East Lothian Council is in broad agreement with Ofcom's proposal to change the definition of a Site to an area where there is not another public call box within 400 metres. With a large percentage of the population now owning mobile telephones, and the proposed change not affecting rural areas with only one public call box, where mobile coverage is more likely to be very poor, we see few problems with Ofcom's proposal.

### **Q3:**

**Definition of a Site** – East Lothian Council's views on this issue are expressed under "Q2".

**Public Bodies with the Local Veto** – East Lothian Council does not have a problem with the power of veto being granted to Scottish unitary councils, rather than community councils. Providing local people and organisations with a medium to express their concerns regarding the potential removal of a public call box is of most importance, and whether this is done through community councils or unitary councils is of lesser importance.

Having said that, it is recognised that local councils are more likely to have access to resources to consult the public fully on such an issue, if required. This would, of course, include the community council, so such organisations would not be taken out of the loop altogether. Further, contact details for local councils are often more widely available than those for community councils.

**The Extended Consultation Period** – Ofcom's proposal to increase the consultation period from 42 to 90 days is viewed in a positive light by our organisation. It allows the body with the power of veto to more fully assess public opinion, as well as giving local people and organisations enough time to make their concerns known through the proper channels; that is, through their elected councillor. Given the fact that councillors are not full time officials, a longer consultation period is advantageous.

**The Rules on Cashless Public Call Boxes** – The reasons given for changes in this regulation are slightly perplexing. Under the current regulations, *“BT and Kingston must ensure that at least one PCB at a site offers cash payment facilities, except for sites which, for historical crime-related reasons, have no cash payment option”*. The reason given for the proposed alteration is that *“BT says it has experienced a high incidence of ‘cash attacks’ on low-revenue PCBs in rural and semi-rural locations and that the annual cost of crime to its PCB business is substantial.”* What then, is the need for change? PCBs with historical crime-related problems are already exempt from the requirement to provide cash facilities. Therefore, the only change this regulation makes is to allow BT to make some call boxes, not subject to vandalism, cashless. If this is the case, the reasons behind the proposed change should be made more transparent.

In principal, East Lothian Council is not against the introduction of a rule requiring 70% of all public call boxes to offer cash payment facilities. However, in cases where there is only one call box on a site, and that this call box does not offer cash payment facilities, it would be imperative, in our view, that users be offered a method of payment which is easy to obtain, and does not cost more than using cash. At present, according to BT’s website, the alternatives offered to cash are a BT Chargecard, and Credit & Debit Cards. To offer only Credit & Debit Card payment facilities would be unacceptable, as the minimum charge is 95p. Similarly, offering Chargecard facilities is only beneficial to those with BT landlines in their homes or places of work (if they have a work Chargecard). This therefore discriminates against those whose home phones are with providers other than BT, or who do not have a home phone that can make outgoing calls for whatever reason. It should be noted that one of the primary reasons for call boxes still existing, is to provide for those who cannot, or do not have a phone in their homes. Offering Chargecard and Credit & Debit Card payment facilities does not help this situation.

In essence, if the proposed new regulations result in sites having only one public call box - one that does not offer cash payment facilities - an alternative to cash must be put in place which is available and accessible to all likely users of the public call box. (An alternative such as a prepayment facility would be most acceptable, providing that phone credits can be bought in reasonably small quantities.) In particular, where a local public body has objected to the removal of a PCB on grounds other than emergency use (or on the grounds of emergency use, but not necessarily to the emergency services), regulations should ensure that cashless boxes are not introduced, except for crime-related reasons.

#### **Q4: Guidance Proposed in Annexe H**

Overall, the guidance notes provided in Annexe H are considered very useful, and put to rest most concerns we had. In particular, the assurance in guidance note 11.2 that *“Ofcom would expect the Universal Service provider*

*to ensure, save in exceptional circumstances, that the means of payment in the Public Call Box include credit/debit cards and pre-payment cards”* is very much welcome, and to a large extent, addresses the potential problem highlighted above. Clarity on what is considered to be exceptional circumstances would be useful though.

## **Conclusion**

East Lothian Council is broadly in agreement with Ofcom’s proposed changes to the Universal Service Obligation. Our only concerns are regarding the provision of cashless public call boxes, as outlined above, and this is largely dealt with in the guidance notes.