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<i>Date / Dyddiad:</i>	7 <sup>th</sup> September 2005

Dear Mr Pridmore

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

I refer to your issue of a statement and further consultation on the review of the Universal Service Obligation that you issued on the 30<sup>th</sup> June. I note that the closing date for responses is the 28<sup>th</sup> September 2005.

This has been the subject of correspondence between us in the past and the County Council is grateful to note that the proposals put forward in this review accord largely with its own aspirations in terms of dealing with public call boxes.

A report was submitted to the Board of the County Council on the 6<sup>th</sup> September, and for your information I enclose a copy of that which explains the background to the consultation and makes recommendations to the Council on the outcome. I also enclose a copy of the draft minute of the Board.

The Board of the County Council concurred with the recommendations of the report apart from recommendation five, when they sought that 120 days would be a better consultation period.

Taking the matters in order, the County Council concentrated on the issue of public call boxes.

For this rural area, as has been set out in a previous letter, the maintenance of the public call box network is critical to overcome difficulties of isolation, poor mobile phone coverage and the need for emergency cover.

The County Council agree with the general approach of OFCOM to the regulation of PCBs.

As to the definition of a site, given the character of this rural area, 400 metres is not an unreasonable position and the County Council agrees with that redefinition.

As to the local veto, the County Council in its last representation suggested that the power of veto should be held by the unitary Counties, and the County agrees with that recommendation of this consultation.

Allied to that, of course, is the responsibility for dealing with consultations. If the County Council is the recipient of consultations on changes to PCBs, then it would seek to involve community councils in that process. Sufficient time should be allowed for this. The process must involve consulting the Community Councils, allowing time for them to meet, consider the issues, and reply to the County Council, and then to allow time for the County Council to consider the response and its own position within its own committees. The proposal for 90 days is insufficient in the County Council's view and it should be 120 days.

The benefit of the extended time is that the County Council can be sure to have made a wide and proper consultation and co-ordinated the response through its democratically elected representatives. In Powys, there are 112 Community Councils and if a consultation comes in on a County wide basis, as it did on the last occasion, co-ordinating responses from these and dealing with their own committee schedules does take time. It was made more difficult on the last occasion since the consultation came out in August when most locally elected bodies do not meet. To allow 120 days, therefore, is not an unreasonable level if you are to take into account democratic accountability and a coordinated response. So the County Council in this recommendation would ask that the consultation time is increased to 120 days.

On the issue of the obligation to provide reasons for the veto to the removal of public call box, the County Council has no difficulty in accepting that it should be an argued case. This is what has been done in the past and we would anticipate that that should be the same in the future.

On the revenue threshold, County Council concur with OFCOM that the revenue threshold is inappropriate and this concurs with the view that it is emergency cover that is often critical when model coverage is so poor.

As to cashless PCBs then the County Council concur that the increased use of cashless PCBs is acceptable providing that safeguards are included.

I hope that these matters can be taken into account and I look forward to hearing from you on this matter shortly.

Yours sincerely

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