

Chief Fire Officers Association (CFOA) Response to Consultation Questions:

Question 1(a): *Do you agree with our overall approach to this review of the general conditions as set out in Section 3 of this consultation? If you do not agree, please explain why, giving reasons for your views.*

CFOA Response: it seems eminently sensible to CFOA that the review should seek to clarify the GCs and to ensure that there is consistency in the language used. However at s3.15 it is proposed that the direction-making powers under s.49 of the Communications Act are removed. Whilst this may be supported by evidence that they have never been used it seems sensible to have this provision which is both more flexible and probably quicker to apply in the event of an issue arising which needs urgent attention. Given the pace of change in the telecoms industry it seems sensible to have an equally quick facility to act should it be necessary.

Question 1(b): *In particular, do you have any alternative suggestions for how to approach the definitions used in the general conditions? If so, please explain why, giving reasons for your views.*

CFOA Response: Again the approach proposed seems sensible to CFOA, there is undoubted benefit in the use of consistent definitions.

Question 2(a): *Do you agree with the changes we are proposing to make to General Conditions 1 to 5, as set out in this consultation? If not, please explain why you do not agree, giving reasons.*

CFOA Response: In general CFOA agrees with the amendments proposed, however we would once again highlight that the telecoms industry moves at an ever increasing pace and the removal of powers to make directions seems short-sighted and, whilst providing some simplification of the GCs, does not add a great deal of complexity to the GCs and so we would recommend that these powers referred to in GC 2 are maintained. If these powers are maintained then CFOA would support the amended wording proposed at 4.21 of the consultation document.

With regards to GC 3, CFOA would agree with the proposed amendments, particularly where they make the requirement to '*maintain (...) uninterrupted access to Emergency Organisations*' clearer.

CFOA would also agree that placing GC 3 and GC 4 into a single condition headed '*Availability of services and access to emergency services*' is a sensible amendment.

However CFOA is supportive of the comments made by BT in relation to GC 4 with regards to use of GPS location and other forms of access such as text, IM and social media. We feel that the way in which many members of the public use the telecoms facilities available mean that there are considerable opportunities to introduce improvements to the emergency call system and that Ofcom is well placed, through the GCs, to drive positive change.

With regards to GC 5 CFOA would agree that requirement to use this GC has not arisen however, we agree with Ofcom that it provides an important backstop power which has encouraged industry to undertake emergency planning. It is CFOA's view that in many cases there will be a commercial business case for effective emergency planning and to encourage rapid restoration of services in the event of a failure. However GC 5 may be particularly

useful in encouraging emergency planning or restoration efforts where remote areas which are less commercially attractive are concerned.

Question 2(b): *Are there any other modifications to General Conditions 1 to 5 that you consider would be appropriate? If so, please explain why giving reasons.*

CFOA Response: CFOA is supportive of the comments made by BT in relation to GC 4 with regards to use of GPS location and other forms of access such as text, IM and social media. We feel that the way in which many members of the public use the telecoms facilities available mean that there are considerable opportunities to introduce improvements to the emergency call system and that Ofcom is well placed, through the GCs, to drive positive change.

Question 3(a): *Do you agree with the proposed revised version of General Condition 6? If not, please explain why and provide reasons.*

CFOA Response: yes, we agree.

Question 3(b) *Do you agree with Ofcom's proposals to remove the requirement to display the means by which charges must be paid on or around PCBs?*

CFOA Response: yes, we agree.

Question 3(c) *Do you consider the requirements to display the location of the public pay telephone and whether or not the public pay telephone is available to receive a call, and if so, the telephone number of the public pay telephone to be necessary requirements? If so, please explain why.*

CFOA Response: CFOA would suggest that the very reason a member of the public would choose to use a public pay telephone would be because they have no other means by which to make a call. Therefore this is likely to involve some occasions where funds may be limited or some other difficulty is apparent. Therefore it would seem sensible to maintain the ability for the user to receive an incoming call and to know where they are.

Question 3(d) *Do you consider that the specific requirements in relation to the accessibility of PCBs and the removal of PCBs in GC 6.3 are no longer necessary to ensure adequate protection of the interests of end users with disabilities? If you do not agree, please explain why.*

CFOA Response: CFOA agrees with the proposals as this area is adequately regulated elsewhere.

Question 3(e): *Is there any other modification to General Condition 6 that you consider appropriate? If so, please explain why.*

CFOA Response: No.

Question 4(a): *Do you agree with the proposed revised version of the condition that would combine General Conditions 8 and 19, as set out in this consultation? If not, please explain why you do not agree giving reasons.*

CFOA Response: this question, and 4(b) and 4(c) related to directory services and printed directories, CFOA does not feel the need to express a view in relation to these questions.

Question 4(b): *In particular, do you agree with the proposal to retain the obligation to provide subscribers with printed directories on request, rather than moving to electronic directories?*

CFOA Response: see response to 4(a) above.

Question 4(c): *Are there any other modifications to General Conditions 8 and 19 that you consider would be appropriate? If so, please explain why giving reasons.*

CFOA Response: see response to 4(a) above.

Question 5(a): *Do you agree with the proposed revised version of General Conditions 17 and 20? If not, please explain why you do not agree giving reasons.*

CFOA Response: this question, and 5(b) relates to numbering, CFOA does not feel the need to express a view in relation to these questions.

Question 5(b): *Are there any other modifications to General Conditions 17 and 20 that you consider would be appropriate? If so, please explain why.*

CFOA Response: see response to 5(a) above.

Question 6(a): *Do you agree with the changes we are proposing to make to the Numbering Plan and the PRS Condition, as set out in this consultation? If not, please explain why you do not agree, giving reasons.*

CFOA Response: CFOA does not feel the need to express a view in relation to these questions.

Question 6(b): *Are there any other consequential changes that you consider would be appropriate? If so, please explain why giving reasons.*

CFOA Response: CFOA does not feel the need to express a view in relation to these questions.