

Title:

Mr

Forename:

John

Surname:

Varney

Representing:

Organisation

Organisation (if applicable):

Ofcom Advisory Committee for England

Email:

[✂]

What additional details do you want to keep confidential?:

Keep part of the response confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

The Advisory Committee for England (ACE) wishes to respond only to the proposals concerning GC8.1(a). Thus all other questions below are left blank.

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. :

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.:

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.:

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.:

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

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?:

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.:

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.:

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

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.:

The Advisory Committee for England (ACE) does not support the entirety of the proposals. ACE is of the opinion that CPs will take this opportunity to remove vital operator services - notably reverse charge calls. We find there to be sufficient reason, particularly, refuting the notion that the use of mobiles has negated the need for this service. Mobile coverage in rural locations is still sufficiently patchy to require public call boxes and operator assisted reverse charge calling. ACE believes this to be a matter of continuing consumer need and one of public safety.

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?..:

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.:

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.:

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.:

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.:

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