

## **The Advisory Committee for Scotland (ACS) response to the OFCOM Consultation on their Review of the General Conditions of Entitlement in relation to GC6: Public Payphones**

The ACS has considered the Consultation on the general conditions relating to network functioning, public payphones, directory information and numbering; we only intend to respond in relation to General Condition 6, regarding Public Payphones.

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

The ACS considers that while it is sensible to remove unnecessary regulation, the provision of payphones in areas with limited mobile phone coverage may need to be regulated separately, and indeed may require additional regulation.

The ACS has particular concerns around the view expressed by BT and quoted on page 35 that ‘the obligation to provide public call box services the Universal Service Condition is an anachronism in a world where there are more mobile phones than people.’ Unfortunately, while there may be more mobile phones than people, there is not full mobile coverage of all the areas in the UK that people visit. Payphones provide a lifeline in mountainous and remote coastal areas with limited mobile coverage, particularly in allowing people to contact the emergency services in the case of accidents in these areas. Mountain Rescue and Coastguard services are sometimes called out unnecessarily because somebody has not been able to get in touch to say they are safely off the hill or the water and payphones also play their part in ensuring that this scenario does not occur.

A new condition setting up specific rules for payphones in areas which do not receive a good signal from, say, 3 mobile phone providers would be one way of dealing with this problem. Our response to questions 3(b) and 3(c) provide examples of the kind of specific provision that such payphones might require, as well as protection against removal due to infrequent use.

**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?*

We have no particular concerns about this, but particularly in the case where payphones require payment by card, it is important that information on how to place a reverse charge call is clearly displayed, as this is no longer something people are likely to be familiar with. This would allow members of the public to reassure family members that they are safe, and avoid unnecessary callout of the Emergency Services as discussed above.

**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.*

Following on from our response to question 3(a) and 3(b), it is also important that payphones in remote rural areas can receive incoming calls, for example in the case where Police, Coastguard or Mountain Rescue teams need to be able to get back in touch with the member of the public who has called them out. Clearly displaying the location of the payphone would also be important in the context of contacting Emergency Services.