

Dear Sirs

Please accept this as a formal response to the current Review of the Telephony Universal Service Obligation, Proposals on Public Call Boxes and Other Changes.

As the Member of Parliament for a largely rural constituency in the South of Scotland, I am acutely aware of the importance of Public Call Boxes across my constituency, particularly in times of emergency.

Local call boxes serve as a lifeline in remote rural areas which still too often suffer from poor, inconsistent, or sometimes the complete absence of mobile signal, and for communities experiencing greater levels of poverty, where some individuals or households may not always be able to afford either the purchase of or continuous use of a mobile phone.

I am aware that under current rules, local authorities may veto proposed removals of the last public call box in an area, but that the proposals currently being consulted upon would end the ability of local authorities to exercise such a veto.

Instead, it is proposed to replace the veto with a "clear, consistent" set of criteria to protect those boxes that are most needed from removal, while allowing boxes that are no longer needed to be removed. BT and KCOM would still have to consult with local authorities on proposed removals of such boxes, using the new criteria.

Within my own constituency, there are fears that should the new criteria being proposed be adopted, namely that call boxes may be retained where they do not have coverage from all four mobile network providers; or they are located in an accident or suicide hotspot; or they have made more than 52 calls over the past 12 months; or there is a relevant exceptional circumstance which demonstrates a need for the PCB, then most if not all local call boxes within my constituency would face removal.

Should however a proposal for a set of "clear, consistent" criteria be progressed, I would strongly urge that criteria mirroring those proposed by Scottish Borders Council, instead be adopted.

I believe Scottish Borders Council have made this proposal direct to Ofcom in their own submission, but briefly the risk criteria they themselves apply locally and suggest as a model, are as follows:

1. The quality of mobile phone coverage in terms of access to all main mobile phone networks in an area (using the Ofcom mobile coverage web site).
2. Proximity to main arterial road routes e.g. A68/A7/A1/A702/A697/A72.
3. Closeness to important walking routes i.e. the Southern Uplands Way, St Cuthbert's Way, John Buchan Way, Borders Abbey Way and the Berwickshire Coastal Path.
4. Usage in terms of more than one police and other emergency services calls i.e. 101/999/111 calls based on information provided by Police Scotland and BT.
5. Closeness to the coast or a fresh water location is considered high risk.
6. Usage by local communities (8 or more calls over the past year).
7. Whether the payphone is the final one in a town centre, residential or village community.

Recent experience of severe storms affecting the South of Scotland, including my own constituency, has underlined the importance of public call boxes as part of the resilience, emergency and community safety infrastructure of local communities. Where digital infrastructure is rendered

ineffective as a result, for example, phone masts being disabled, or power outages leading to mobile phone units being unable to be recharged, PCBs remain available as a backup means of communication for more remote and rural areas.

In such circumstances, a set of criteria, such as is proposed by Scottish Borders Council, seems to me to be even more important in helping ensure these communities and individuals and families living within them, can be assured of continued communications during times of emergency and adverse weather conditions.

I would therefore strongly recommend that when reviewing the Telephony Universal Service Obligation, Ofcom adopt a set of criteria as proposed by Scottish Borders Council, and in doing so help preserve the accessibility of PCBs within those communities which need them the most.

Yours faithfully

David Mundell