

Dear Chris

[...]

Broadly there is 100% agreement with the comments of BT Payphones previously submitted. Simply exempt public and privately managed payphones from this regulation. Payphones can not and will not be able to support service charge caps in a charging mechanism. Payphones require money to be inserted at the beginning of the call which then calculates the amount of money owed based on the number dialled using a tariff table lookup. Previous requests for numbers to have similar charges have resulted in payphones being exempt and charging mechanisms being changed. One recently was 101 being free to end user. Once again Spectrum agrees that another option other than exemption could be the ability to bar such calls from the phones but simply prefers a per minute charge on these services when being used from payphones.

I hope this adds weight to the consultation process.

Regards
Mark Jacobs
Consultant