

Your response

Question	Your response
Question 1: Do you agree with our proposed changes to the requirements on BT and KCOM in respect of the pricing and services provided by their PCBs? In particular do you agree with: (i) allowing free calls from PCBs; (ii) removing the requirement for PCBs to offer incoming calls where outgoing calls are free; (iii) removing the requirement for PCBs to offer outgoing calls to unbundled tariff numbers (including premium rate and directory enquiries) and international numbers; and (iv) removing the requirement for 70% of PCBs to accept cash payment and replacing it with a requirement on BT and KCOM to assess	 (i) Yes (ii) Yes (iv) Yes
whether cash payment facilities meet an ongoing need. Please provide reasons for your view.	
Question 2: Do you agree with our proposed new process for BT and KCOM to consult on proposed PCB removals? In particular do you agree with our proposed removal criteria for assessing whether there is an ongoing need for a PCB?	East Ayrshire Council is concerned that the removal criteria listed in Section 1.5 of the consultation paper are not broad enough to ensure that a PCB would be available in all those places where they are required. In particular, with regard to criterion (i) and (iii), in certain cases a PCB may be used fewer than once per week per year, but may nevertheless be invaluable to certain community members, particularly where weak mobile signal even if all four networks provide coverage may mean that the provision of a PCB would have been preferable. With regard to criterion (ii), whilst provision is proposed to continue in those areas of frequent instances of suicide or accident, such statistics cannot account for every eventuality and the closure of some PCBs, particularly in remote areas, may remove a

	valuable lifeline where an emergency situation could not have been predicted. East Ayrshire Council would ask Ofcom to consider the above factors when finalising their proposals.
Question 3: Do you agree with our proposal to impose a new resilience obligation for PCBs? And do you agree with our proposed guidance that those PCBs which are more likely to be needed in the event of a power cut should have a solution which enables emergency calls to continue to be made for a minimum of three hours in the event of a power outage? Please provide reasons for your view.	Yes
Question 4: Do you agree with the proposed amendments to the conditions on BT and KCOM in respect of considering requests for new PCBs?	Yes
Question 5: Do you agree that it is no longer appropriate for the universal service obligations to require provision of fax services in light of the impact of IP migration on the functionality of these services?	Yes
Question 6: Do you agree with our proposal to revoke the itemised billing requirement from the universal service conditions?	Yes
Question 7: Do you agree with our proposed reporting requirements on BT and KCOM?	Yes
Question 8: Do you agree with our proposed changes to tidy-up the wording and definitions used in the universal service conditions?	Yes