

## Your response

Question	Your response
<p><b>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:</b></p> <p><b>(i) allowing free calls from PCBs;</b></p> <p><b>(ii) removing the requirement for PCBs to offer incoming calls where outgoing calls are free;</b></p> <p><b>(iii) removing the requirement for PCBs to offer outgoing calls to unbundled tariff numbers (including premium rate and directory enquiries) and international numbers; and</b></p> <p><b>(iv) removing the requirement for 70% of PCBs to accept cash payment and replacing it with a requirement on BT and KCOM to assess whether cash payment facilities meet an ongoing need.</b></p> <p><b>Please provide reasons for your view.</b></p>	<p>We agree with the principle of offering free calls from PCBs. Free calls to organisations who are members of Helplines Partnership would ensure that those who are most vulnerable will not need cash or a bank card to access important services. This may include domestic abuse services, immigration assistance, mental health support and children in need of emotional or practical assistance. We would be willing to work with Ofcom to establish a set of principles to ensure free calls to these organisations are available.</p> <p>Disagree with (ii). In some safeguarding circumstances there may be a need for an organisation to call back a person in crisis who may have disconnected the call. This is particularly important in areas which see a high frequency of people taking their own life.</p> <p>(iv) cash payment offers a discreet way for a person to access a helpline, such as domestic abuse services or Samaritans. By removing access, you will also be disadvantaging those least likely to be able to pay by card or phone, such as the street homeless or a young person. This issue can be resolved by ensuring those organisations with helplines who are members of Helplines Partnership are free to call from PCBs.</p>
<p><b>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?</b></p>	<p>Disagree in part.</p> <p>These changes will remove the ability for a community to protect their PCBs. This is particularly important in cases where an individual relies on a PCB for calls of a safeguarding nature. It may seem that this PCB makes very few calls however the risk of removing it is considerable. This will not be able to be challenged under the new system.</p> <p>It is not right to judge a PCB's future based on the amount of calls it makes without</p>

	<p>consideration of the purpose of calls. Should a call box make just a few calls each year, but to helplines such as Samaritans, Childline or Domestic Abuse Services, then it has demonstrated the value and importance it has. However under the proposed changes it could be lost to the community. There is a considerable safeguarding risk to vulnerable individuals who may lose their access to a lifeline without appropriate protections in place.</p> <p>In preparing our response for this consultation we have met with representatives from BT and have agreed to work together and establish a series of thresholds of calls to helplines to ensure these payphones are protected from removal.</p> <p>We would like Ofcom to introduce a process by which PCBs can be adopted by Councils or organisations. This would ensure that local communities or organisations representing smaller geographical areas may step in to keep a PCB in use if it is deemed valuable to the community.</p> <p>We also strongly urge OFCOM to change the language around what you refer to as 'Suicide Hotspot'. We have engaged with our member, Samaritans, about this wording and there are concerns that labelling a location as a 'suicide hot spot', as referred to in the consultation document, can increase people's awareness of a particular location, potentially transforming it into an iconic site widely known for suicides, which can draw vulnerable people to the location. 'High frequency location' can be a more useful description to use.</p>
<p><b>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?</b></p>	<p>We agree with this measure. It is important that those PCBs in areas of poor mobile phone signal can be used in the event of a power cut. We are however keen to ensure there are considerable back-up systems to allow use over a period of days without power. Recent events of extreme weather have demonstrated that some areas can be without power for several days and this should be reflected in the solution. Helpline use should also be a consideration when looking at PCBs to have</p>

<p><b>Please provide reasons for your view.</b></p>	<p>back up systems to lessen the safeguarding risk should there be a power cut.</p>
<p><b>Question 4: Do you agree with the proposed amendments to the conditions on BT and KCOM in respect of considering requests for new PCBs?</b></p>	<p>We would like to see greater powers given to communities to introduce PCBs where they deem, they are needed. Combined working with Parish and Town Councils, charities and community groups could result in more PCBs entering our communities and a sharing of the cost.</p> <p>It is acknowledged that current demand does not reflect future need so it is important that there are clear processes and costs associated with establishing new PCBs.</p>
<p><b>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?</b></p>	<p>No opinion</p>
<p><b>Question 6: Do you agree with our proposal to revoke the itemised billing requirement from the universal service conditions?</b></p>	<p>We seek assurances from Ofcom that those who call our member helplines will continue to be protected by not having it appear on their bill. This is particularly important to ensure those calling domestic abuse helplines are safe to do so. Any change which could put them more at risk is a serious safeguarding issue.</p>
<p><b>Question 7: Do you agree with our proposed reporting requirements on BT and KCOM?</b></p>	<p>As per the consultation document, it is known that almost a third<sup>1</sup> of the BT estate is in disrepair and often communities have to wait a considerable time for them to be fixed. We would like steps taken to monitor and enforce repairs within reasonable timescales. We also request that OFCOM put in place a requirement for prioritising PCBs which are used to call our member helplines.</p>
<p><b>Question 8: Do you agree with our proposed changes to tidy-up the wording and definitions used in the universal service conditions?</b></p>	<p>No opinion</p>

<sup>1</sup> [https://btbusiness.custhelp.com/app/answers/detail/a\\_id/30232/~/what%E2%80%99s-the-service-level-for-public-payphones%3F](https://btbusiness.custhelp.com/app/answers/detail/a_id/30232/~/what%E2%80%99s-the-service-level-for-public-payphones%3F)