

Consultation response form

Please complete this form in full and return to telephonyUSO@ofcom.org.uk.

Consultation title	Review of the telephony universal service obligation
Full name	[X]
Contact phone number	[X]
Representing (delete as appropriate)	Self / Organisation
Organisation name	N/A
Email address	[X]

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing / Your name / Organisation-name / Whole response / Part of the response (you will need to indicate which question responses are confidential)
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None / Whole response / Part of the response (you will need to indicate below which question responses are confidential)
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes / No

Your response

Question	Your response
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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 whether cash payment facilities meet an ongoing need.

Please provide reasons for your view.

Confidential? – Y / N

In answer to (i)

I agree that free calls can incentivise use but free calling directly should be carefully considered to avoid abuse. Maybe automatically imposing a time lock out if a large volume of calls are attempted in a very short space of time.

A public calling facility should also ensure a means of calling general non-free or unsubsidised numbers remains available such as international calls. This could be via an operator or I would also suggest offering a single sign on method which customers could use to sign in to their own accounts. This would also mitigate anonymous calling abuse. Eg A mobile user who has a broken phone in need of using a public phone could sign in to their own account and make calls against their own credit and account. It would be up to the payphone operator and account provider (mobile operator in this case) to provide a means of sign in and decide on the facility fee or convenience cost attributable and if or how this would be passed on to a customer, or not. (Or else included as part of their overall plan) In effect this is provision of an IP endpoint to which providers can connect their customers.

In addition consideration to adding video calling would be an asset, as well as helping users using their own accounts, it would also help emergency operators as adding video to a 999 call by default would almost certainly reduce hoax calling but would also mean better assistance to genuine ones.

In answer to (ii)

I agree this could be considered and by following the example above incoming calls directly supported would be unnecessary as a customer who signed in and used it as an end point would in effect be using their own number and should be able to make and receive calls as per that account.

In answer to (iii)

I partly agree – There should be no need for the majority of premium rate numbers to be available, however the need to be able to call internationally

should be available. Travellers who may find themselves in need may need to get hold of family overseas. The function could be supported as described above, but in the event that they have no other means to sign in the option should be available, even if it is via an operator. Where payment can be achieved this can be done using standard methods such as collect calling, cash, or billing against a credit card. Otherwise the operator could make a decision on the genuine need and decide to allow a welfare call for a few minutes.

In answer to (iv)

I am think there should remain the means to take cash payments, though the ratio could be adjusted slightly. I would highlight that at present an opportunity of modernising public call boxes into more of a public communication office and multifunction facility should be taken and this may prove an advantage to operators. Providing top ups to mobile phones or taking payment for pre-paid utilities may well be a means of serving people who might need to do that along with increasing usage. Other functions could be available for a small fee, such as a mobile charging point locker, Wi-Fi/internet, and depending on the practicality of the location could also have e-vehicle charging. Though whilst I encourage a means of cash payment in this respect, I do accept it has not been standard in e-vehicle charging stations. The opportunity would be payphones in rural lay-bys where apps and signal may be difficult and cash may help the situation.

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?

Confidential? – Y / N

I agree that a consultation process should be sufficient, as long as stakeholders who may wish to be involved in that process, can do so. Where a local authority/community/parish has strong reasons to want to keep a facility they should also have the opportunity to adopt a functional payphone facility (ie

	<p>with an operable payphone). A group, such as volunteers or authority could agree to clean and maintain the kiosk, empty cash (and remit it). The service would still be provided by a telephone company but with them only supplying the payphone. They would then only need to attend in the event of a fault. Other community facilities could be provided at the same time. There is no reason a phone has to be decommissioned to turn it into a defibrillator location for example. Both could exist at the same location.</p>
<p>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?</p> <p>Please provide reasons for your view.</p>	<p>Confidential? – Y / N</p> <p>I partly agree – These proposals will suffice in the majority of locations. However there may be need in particularly remote areas, or areas prone to power cuts to have slightly greater battery resilience, which could be determined by an assessment, and by re-assessment based on history of outages.</p> <p>To add to my points in previous answers. Whilst I have encouraged some opportunity to increase capability, I do accept in a power failure situation added functionality may be unavailable and only a basic service provided to sustain emergency calling.</p>
<p>Question 4: Do you agree with the proposed amendments to the conditions on BT and KCOM in respect of considering requests for new PCBs?</p>	<p>Confidential? – Y / N</p> <p>I partly agree – As described the amendments seem sensible. But I would also suggest that there should be a means for sponsoring or co-funding a new PCB where it has been reasonably requested. It may help with the viability. Any cost share should be proportionate to the requesting party, but would allow some defraying of some of the cost of installation. An agreement could also made on the cleaning and maintenance of a new PCB as well. There should also be an avenue of appeal so if a request has been turned down that the request can be independently looked at again.</p>
<p>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?</p>	<p>Confidential? – Y / N</p> <p>There exists a protocol to support the use of fax - T.38. Whilst the use of devices is waning they do still exist and are still in use. Legislation could be amended to require this protocol to be available under the USO, on the understanding that not all networks, such as mobiles would support the</p>

	capability.
Question 6: Do you agree with our proposal to revoke the itemised billing requirement from the universal service conditions?	Confidential? – Y / N I agree with the proposed actions
Question 7: Do you agree with our proposed reporting requirements on BT and KCOM?	Confidential? – Y / N I agree with the proposed actions
Question 8: Do you agree with our proposed changes to tidy-up the wording and definitions used in the universal service conditions?	Confidential? – Y / N I agree with the proposed actions.

Final Comments:

I think there have been missed opportunities over the years, and the change of technologies could allow an opportunity for the payphone network to be revitalised into communication point or hub office end point for a variety of services. I have no objection to moderate charging for facilities which ultimately are not free of cost to install and maintain, even when supported by the voluntary sector. BT did pioneer in the early 2000s internet kiosks and now that the technology could be much more mature and I think this could be re-invigorated. Especially so in more remote areas where there could be opportunities. Having such versatile IP endpoints would be a strategic asset. It has potential to support emergency planning, allows a known level of resilience, and actually aids with the migration of the legacy analogue network to IP. If particularly vulnerable users understand there is a fully supported fallback to their phone nearby in case of problems they may not feel so anxious about it. Network operators could be able to offer their users seamless fallback to their accounts by a sign-in process, allowing access to their existing contacts, and avoid entirely the problem of calling from an unrecognised number. These often go beyond traditional telephony as it wouldn't matter if the sign-in was a mobile phone customer, Zoom, or Google Meet.

When you add to further facilities, such providing top-up services, e-vehicle charging these could make the network more cost neutral, if not positive.

In the interests of net neutrality I think it would also be fair to be clear here that provision of an IP endpoint *for the sole purpose of connecting to a communication provider* would be specifically to aid direct communication and that this differs from a internet connection. I would encourage both options to be available, but where a customer buys or gets access to "the internet" this should follow standard net neutrality rules.