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Sent by email: telephonyUSO@ofcom.org.uk

10 January 2022

Dear Sirs,

CONSULTATION: OFCOM REVIEW OF THE TELEPHONY UNIVERSIAL SERVICE OBLIGATION

Thank you for providing New West End Company with the opportunity to respond to your review of the telephony universal service obligation in the UK. We represent 600 businesses across Bond Street, Oxford Street, Regent Street and Mayfair and 150,000 employees in this district.

Whilst we remain fully supportive of the principle of protecting Public Call Boxes (PCB's) that are still required for essential use, we are concerned that the proposed new PCB protection criteria that will be applied across the UK does not take account of specific local factors, particularly the existing concentration of PCB's in some areas.

Within the West End there is a very dense network of PCB's already in place, many of which are in poor condition and attract anti-social behaviour. New West End Company already consider that there is a strong case for the repurposing or removal of a high proportion of the PCB's in our area, particularly given the available mobile coverage that is already in place. However, given the significant challenges that we are already facing with existing service providers to enable the repurpose or removal of PCB's, we are concerned that further proposals to strengthen the protection criteria will only make future change harder to achieve.

We have a particular concern with 2 elements of the protection criteria:

Criteria 3: public call box has been used to make 'more than 52 calls over the past 12 months'

We consider that this should also include a detailed analysis of the nature of the calls, rather than focusing on the overall number. This should help ensure that only those PCB's that are providing an essential public service in the West End are subject to the extra protection.

Criteria 4: there is a relevant exceptional circumstance which means the public call box is needed.

Criteria 4 is vague and we are concerned that it could be used by the service provider to continue to prevent future aspirations to repurpose, remove or relocate PCB's.

In addition, and as stated above, the protection assessment should factor in the density of PBC's in any given area, to enable greater scope for repurposing or removal in areas such as the West End that experience very high numbers.



Clearly the key focus of this consultation is about protecting essential PCB's and to ensure that the service providers are required to follow a consistent process when seeking removal. As stated, the principle of this approach is supported. However, there should also be a way for Local Authorities or other key local representative groups, including Business Improvement Districts, to pursue a transparent process to make the case for the removal of certain PCBs.

Finally, ongoing issues with the maintenance and repair of PCBs in the West End remains a major challenge, compounded by their proliferation across the area. This results in a significant impact on the quality of the public realm environment. Measures should be in place to ensure that the PCB's are maintained at appropriate levels.

Thank you for the opportunity to comment and please let us know if any further clarification is required.

Yours Sincerely,



Richard Lancaster
Public Realm & Transport
New West End Company