

Your response

Question	Your response
<p>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:</p> <p>(i) allowing free calls from PCBs;</p> <p>(ii) removing the requirement for PCBs to offer incoming calls where outgoing calls are free;</p> <p>(iii) removing the requirement for PCBs to offer outgoing calls to unbundled tariff numbers (including premium rate and directory enquiries) and international numbers; and</p> <p>(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.</p> <p>Please provide reasons for your view.</p>	<p>No - Public call boxes (PCBs) are a vital part of the resilience, emergency and community safety infrastructure of local communities in the Scottish Borders. This is extended upon in the answers to the questions below.</p> <p>Applying Ofcom's proposals and criteria, it is considered that most public call boxes would be removed from rural communities, villages, town residential areas, and town centre in the Scottish Borders, together with those which are adjacent to main arterial and active travel - walking/cycling/horse riding routes. This is because very few PCBs in these locations are used to make 52 calls or over in a year, which is not surprising given the low population density in this rural region.</p> <p>It is important from a community resilience perspective that payphones are made as easy to use as possible by the public and local communities. This should involve free outgoing and incoming calls. It is critical that the use of payphones for free 101, 999 and 111 is well publicised and marketed and that boxes display this information.</p>
<p>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?</p>	<p>No - Councils should retain the veto on the closing of payphones.</p> <p>The Scottish Borders is a large rural area with a diverse geography and comprising many small towns, villages and more sparsely populated communities. Payphones provide an important service in support of emergency planning and community resilience across this diverse land area.</p>

In recent years the Scottish Borders has experienced an increasing number of major weather related and other emergency incidents. Scottish Borders Council works with a wide range of partners including the police and the fire and rescue services and local communities and has built up a very strong community resilience structure. This has given the local authority important insights into the importance of services such as PCBs for emergency planning and community resilience.

There is no real acknowledgement in the Ofcom proposals that public call boxes play a vital part of the resilience, emergency and community safety infrastructure of local communities. Payphones provide a key point of contact for Emergency Services, in providing access to a public telephone for police and emergency service calls i.e. 101/999/111 calls in their local communities. Also, they provide a backup telephone line available to all in the case of electrical power blackouts when mobile phones can quickly run out of charge and phone masts become disabled. This is an increasingly important issue with climate change and the incidences of more frequent storms following Storm Arwen. Please see this BBC report [**Storm Arwen: Why power cuts left people unable to phone for help**](#) regarding some of the resilience issues posed by the storm.

It is considered that Ofcom should adopt and recommend Scottish Borders Council's set of risk criteria for retaining public call boxes which is more appropriate in a rural context. Payphone would be protected if they meet one or more of these criteria.

These criteria are as follows:

- The quality of mobile phone coverage in terms of access to all main mobile phone networks in an area (using the Ofcom mobile coverage web site).

	<ul style="list-style-type: none"> • Proximity to main arterial road routes i.e. 'A' class routes e.g. in the case of the Scottish Borders - A68/A7/A1/A702/A703/A697/A72. • Closeness to important active travel walking/cycling/horse riding routes e.g. in the case of the Scottish Borders - the Southern Uplands Way, St Cuthbert's Way, John Buchan Way, Borders Abbey Way and the Berwickshire Coastal Path. • Usage in terms of more than one police and other emergency services calls i.e. 101/999/111 calls in a year based on information provided by Police Scotland and BT. • Proximity to coastal or fresh water locations that are considered to be of high risk. • Usage by local communities (8 or more calls over the past year). • Whether the payphone is the final one in a town centre, residential area or village community.
<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>There should be a resilience obligation based on the approach outlined below.</p> <p>As mentioned above Councils should retain the veto on the closing of payphones.</p> <p>As indicated in response to Question 2 there is no real acknowledgement in the proposals that public call boxes are a vital part of the resilience, emergency and community safety infrastructure of local communities. Payphones provide a key point of contact for Emergency Services, in providing access to a public telephone for police and emergency service calls i.e. 101/999/111 calls in their local communities. Also, they provide a backup telephone line available to all in the case of electrical power blackouts when mobile phones can quickly run out of charge and phone</p>

masts become disabled. This is an increasingly important issue with climate change and the incidences of more frequent storms following Storm Arwen. Please see this BBC report [**Storm Arwen: Why power cuts left people unable to phone for help**](#) regarding some of the resilience issues posed by the storm.

For this reason it is considered that Ofcom should adopt and recommend Scottish Borders Council's own set of risk criteria for retaining public call boxes.

These criteria are as follows:

- The quality of mobile phone coverage in terms of access to all main mobile phone networks in an area (using the Ofcom mobile coverage web site).
- Proximity to main arterial road routes i.e. 'A' class routes - in the case of the Scottish Borders e.g. A68/A7/A1/A702/A703/A697/A72.
- Closeness to important active travel walking/cycling/horse riding routes e.g. in the case of the Scottish Borders - the Southern Uplands Way, St Cuthbert's Way, John Buchan Way, Borders Abbey Way and the Berwickshire Coastal Path.
- Usage in terms of more than one police and other emergency services calls i.e.101/999/111 calls in a year based on information provided by Police Scotland and BT.
- Closeness to coastal or fresh water locations that are considered to be of high risk.
- Usage by local communities (8 or more calls over the past year).
- Whether the payphone is the final one in a town centre, residential area or village community.

Question 4: Do you agree with the proposed amendments to the conditions on BT and KCOM in respect of considering requests for new PCBs?

Requests for new PCBs should be based on these meeting at least one of the following criterion with exceptions being made on this basis of arguments on population and community requirements and needs. Councils should also have a say in this.

These criteria are as follows:

- The quality of mobile phone coverage in terms of access to all main mobile phone networks in an area (using the Ofcom mobile coverage web site).
- Proximity to main arterial road routes i.e. 'A' class routes e.g. in the case of the Scottish Borders - A68/A7/A1/A702/A703/A697/A72.
- Closeness to important active travel – walking/cycling/horse riding routes e.g. in the case of the Scottish Borders - the Southern Uplands Way, St Cuthbert's Way, John Buchan Way, Borders Abbey Way and the Berwickshire Coastal Path.
- Usage is required for making police and other emergency services calls i.e.101/999/111 calls.
- Proximity to coastal or fresh water locations that are considered to be of high risk.
- Usage can be made by local communities (8 or more calls over a year).
- The payphone adds to the security of town centres, residential areas and/or village communities.

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?

There is a need to include e-text/visual face to face telecommunication service, mobile phone charging points, alongside voice services within payphones as part of the universal service obligation.

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?	No - see answers to Questions 2,3, and 4
Question 8: Do you agree with our proposed changes to tidy-up the wording and definitions used in the universal service conditions?	No – see answers to Questions 2,3, and 4