



The IHBC National Office  
Jubilee House  
High Street  
Tisbury  
Wiltshire  
SP3 6HA  
Consultations@ihbc.org.uk

11<sup>th</sup> January 2022

Dear Sir

**Review of the telephony universal service obligation  
Ofcom Proposals on public call boxes and other changes**

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

IHBC welcome the proposals to upgrade the public telephone network. Principally IHBC are keen to support the retention of traditional red kiosks whether with Listed status or not and in sensitive, historic and important locations. But many often now unsightly 1990s kiosks remain in urban areas and are not cleaned or maintained. They can harm the visual amenity of historic areas including Conservation Areas because of their dirty condition and graffiti covered exterior and also be used for antisocial behaviour such as urination and defecation, drug taking, drug dealing, prostitution etc.

It is clear that provision is needed for how they are to be managed and a process for decision-making put in place as well as a policy and

plan for their removal including a determination of whose responsibility it is to pay for their removal and for any necessary making good within the public realm.

IHBC suggest that as part of the network upgrade, BT should be required to remove duplicate poor quality kiosks in the locality of the upgraded payphone by an agreed process. Additionally, a simpler process should be introduced to allow for communities and Local Authorities to secure the removal of surplus kiosks that are causing them problems with anti-social behaviour.

The careful placement and installation of new inlink advertisement panel telephone units from BT may be appropriate to replace 1990's telephone kiosks but IHBC suggests that stronger provision concerning responsibility for the upkeep and maintenance of new kiosks is needed.

IHBC suggests in the progression of this network upgrade that in consultation with Local Authorities an overview should be taken of all public telephone facilities within a particular area. It is hoped that the application of new criteria would assist in the identification and determination of those that should remain and those that should not. This would identify kiosks which have a particular importance not necessarily just for reasons of mobile signal availability but also for other social reasons. It would also identify kiosks which should be removed. It is often difficult to get kiosks removed and it is unclear who has financial responsibility for their removal. A more structured pathway to their removal is needed and a partnership approach. In this more structured approach appropriate decision-making should also be required concerning the remaining kiosks that are not needed and a plan devised for their removal together with a plan for making good the public realm after their removal.

### Consultation response form

<b>Consultation title</b>	Review of the telephony universal service obligation
<b>Full name</b>	[✕]
<b>Contact phone number</b>	
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Institute of Historic Building Conservation
<b>Email address</b>	<a href="mailto:consultations@ihbc.org.uk">consultations@ihbc.org.uk</a>

### 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](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes

## Your response

<b>Question</b>	<b>Your response</b>
<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> <ul style="list-style-type: none"> <li><b>(i) allowing free calls from PCBs;</b></li> <li><b>(ii) removing the requirement for PCBs to offer incoming calls where outgoing calls are free;</b></li> <li><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></li> <li><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></li> </ul> <p><b>Please provide reasons for your view.</b></p>	<p>Confidential? – N</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>Confidential? – N</p> <p>As well as issues of mobile coverage the process should include consultation with the Local Authority to identify socio economic need and community relevance for retention. The Local Authority will as well in some cases suggest removal of certain poorly managed kiosks which are damaging to the area and centres for anti social behaviour</p> <p>A more detailed partnership approach is needed in practice</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><b>Please provide reasons for your view.</b></p>	Confidential? – Y / N
<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>	Confidential? – Y / N
<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>	Confidential? – Y / N
<p><b>Question 6: Do you agree with our proposal to revoke the itemised billing requirement from the universal service conditions?</b></p>	Confidential? – Y / N
<p><b>Question 7: Do you agree with our proposed reporting requirements on BT and KCOM?</b></p>	Confidential? – Y / N
<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>	Confidential? – Y / N

We hope these remarks are of assistance,

Yours sincerely



IHBC Operations Director