

## Communications Consumer Panel and ACOD's response to Ofcom's consultation on its review of the Telephony USO: Public Call Boxes

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### About us

The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the citizen and consumer voice is represented in communications policy development.

The Panel's job is to ensure that the sector works for consumers, citizens and micro businesses - and in particular people who may be in a more vulnerable position in society. We carry out research, provide advice and encourage Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD (the Advisory Committee for Older and Disabled people) with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

### Our response

We support Ofcom's commitment to ensuring public call boxes that are needed are protected from removal.

In this response, we highlight issues affecting consumers, which we believe Ofcom could consider as part of this review.

We recently met with Ofcom and fed in these points, after engagement with consumer stakeholders across the UK and having listened to consumers directly.

### Protection of people most at risk

Access to public call boxes can save lives. We urge Ofcom to connect with agencies that hold data on areas where accidents, domestic abuse and suicides regularly occur, so that citizens in greater risk would be protected.

We note that Ofcom's proposals would allow the relevant public body to object to a proposed public call box removal and we welcome this.

### Accessibility

We understand from the Panel's stakeholder engagement that many public call boxes are inaccessible to some members of the public. This is relevant in terms of measuring usage,

as a public call box that cannot be used by all will not have been used by some who needed it but were unable to access it.

The hypothetical need to use a public call box, or the impact of not having been able to use a call box when in need, because of poor accessibility, would be difficult to measure reliably. However, we have highlighted to Ofcom that we believe the review should require universal service providers to ensure that public call boxes are accessible, extending minimum accessibility criteria, informed by user testing. This is in line with the Panel's overarching approach to making the communications sector more inclusive.

We appreciate that universal service providers have introduced new accessible on-street devices that offer free calls and additional services such as Wi-Fi and charging points and we welcome this initiative.

### **Consumer in rural and remote parts of the UK**

We have previously highlighted the importance of public call boxes in areas where mobile signal is inadequate or non-existent, such as coastal and mountainous areas.

We would also like to understand how universal service providers measured mobile coverage, as provided to Ofcom and have suggested that this information should be publicly available, noting that some areas with nearby masts experienced poor mobile coverage.

In 2021 the Panel commissioned and attended two pilot consumer immersion sessions - independently-facilitated focus groups where Panel Members were able to listen to consumers discussing telecoms matters. The topic of public call boxes arose between consumers in Northern Ireland, who discussed poor mobile coverage and mentioned that they relied on public call boxes to make calls. Other consumers said that because public call boxes were no longer widely available, mobile phones and signal had become even more essential to them.

Participants of the Panel's National Stakeholder Hubs - organisations that represent the views of consumers, citizens and micro businesses across the UK - have previously highlighted to us their concerns that consumers living in rural areas lack access to digital infrastructure and a reliable connection, leaving them feeling 'left behind' compared to other parts of the UK. We have fed back these concerns to Ofcom's policy teams.

### **Migration of telephony to Internet Protocol networks (IP)**

We are concerned that after the migration to IP, public call boxes will require an electricity supply and possibly also battery-back up to enable continued service during a power cut. We would urge that Ofcom ensures a way that universal service providers could be alerted if a resilient power supply or local back-up battery was deployed, to ensure protection of consumers in temporarily very vulnerable circumstances.

Stakeholders representing consumers living and working in rural areas have also raised concerns at the Panel's National Stakeholder Hubs around the migration to IP. Consumers living in areas with no reliable mobile signal currently rely on landline services. After migration, these services will have limited protection after a power cut. This could mean that consumers in rural and remote locations may rely more on public call boxes, in comparison to now.

## Other considerations

We have also highlighted to Ofcom our concerns around consumers' ability to make international calls, particularly on ensuring that calls from Northern Ireland are not considered 'international', following Brexit and not considered 'international' across the border.

We have also raised with Ofcom the need for universal service provider to raise the cultural significance of public call boxes, to protect them from vandalism and misuse.

## Summary

- We support Ofcom's commitment to ensuring public call boxes that are needed are protected from removal;
- We are concerned that public call boxes are retained in areas where accidents, domestic abuse and suicides regularly occur;
- We urge Ofcom to ensure public call boxes are accessible to all who need them;
- We are concerned that public call boxes be retained in remote and rural settings, particularly given the potential impacts on consumers who are reliant on landlines in those areas, when telephony migrates to IP networks;
- We urge that universal service providers find a way to ensure they are aware of battery back-up initiating in public call boxes affected by power cuts, so that priority can be given to arranging continued service;
- Other considerations include the definition of international calls and protection from vandalism and misuse, to ensure that citizens can use public call boxes - we highlight that information about the use of public call boxes does not include citizens who needed to use a public call box, but were unable due to poor accessibility, or vandalism or misuse of the public call box they needed to use.