



Commission for
Communications Regulation

USO- Provision of Public Pay Telephones Usage Threshold Review

Submissions to Consultation 16/43

Submissions to Consultation

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An Coimisiún um Rialáil Cumarsáide

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Submissions Received from Respondents

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Content

Section

1. Abbey Theatre
2. Bradshaw, Mr Jonathan
3. Cuff, Councillor Ciaran
4. Dalkey Community Council
5. Dublin City Council
6. Dublin Town
7. Eircom Limited (Eir)
8. Flood, Mr Andrew
9. Gear, Mr Jeff (Gear Jewellers)
10. Helly, Mr Jamie
11. Hennessy, Mr Darren
12. Kiely, Mr Ger
13. Lyons, Cllr. Donal
14. Lyons, Mr F
15. Lyons, Mr J
16. McDonagh, Ms C
17. Phibsboro Tidy Towns
18. Phizzfest Reimagining Phibsborough Campaign
19. Solitaire Payphones
20. Tannam, Mr Frank
21. Women's Aid

1 Abbey Theatre

Hi,

I'm contacting you in response to the consultation on maintaining public payphones as a public utility.

Should the upkeep (or lack thereof) continue as it is, the public phone boxes should be removed.

The phone box at the corner of Abbey and Marlborough Street outside the Abbey Theatre is a prime example of how much of an eyesore that public phone boxes have become.

It's neglected. It's an advertising space, has a broken pane of glass and tends to be used by those contributing to antisocial behaviour and not the general public.

If you need further information, please let me know.

All the best,
Elaine

Elaine Mannion

Sales & Ticketing Manager

ABBHEY THEATRE

AMHARCLANN NA MAINISTREACH

26 Lower Abbey Street, Dublin 1, D01 K0F1

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E: elaine.mannion@abbeytheatre.ie

www.abbeytheatre.ie

2 Bradshaw, Mr Jonathan

wireless world where infrastructure and customer equipment is subject to failure the role of the public phone box while diminished remains important. The role of the Phone Box as a point of public communicates should be extended to adopt modern communications technology and practice. Opportunities to extend the usage and relevance of the Public Phone Box infrastructure might include public access WiFi and 3G/4G Pico Cells.

3 Cuff, Councillor Ciaran

Madam/Sir,

I request that you remove all phone boxes where

- i. there is evidence of anti-social behaviour; or
- ii. usage in the previous 6 months was low, i.e. the average usage is less than 1 minute per day and the average usage to Freephone numbers and ECAS is not more than 30 seconds of these minutes;
5 or
- iii. there is more than 1 payphone on the site and the combined average does not meet the low usage standards; or
- iv. it is requested by a Local Authority.

I also note the recent and significant increase in urban blight caused by your flagrant use of your phone boxes for advertising for third parties in recent years and ask that you discontinue this use of your phone boxes for such advertising immediately.

Thanks for reading, and I ask that you acknowledge this submission in writing.

All the best,

Ciarán

Councillor Ciarán Cuffe 087 265 2075
Green Party : Comhaontas Glas North Inner City Ward
50 Montpelier Hill, Stoneybatter D07 F8H2
Cuirim Fáilte Roimh Ghaeilge - Irish Welcome
www.CiaranCuffe.ie
Oifigeach Poiblí Ainmhithe faoin Acht um Bristocaireacht a Rialáil 2015
Designated Public Official under the Regulation of Lobbying Act 2015

4 Dalkey Community Council

To whom it may concern:

I am contacting you on behalf of a number of concerned residents in Dalkey who are very upset that Dalkey may lose theeircom phone box at the Squareabout in the town. It is in a position to serve one end of the town and the local residents find it as a re-assuring facility.

Please give this matter further consideration.

Thanking you.

Kind regards,

Ann Perry

Secretary

Dalkey Community Council

5 Dublin City Council

Dublin City Council Submission to ComReg Consultation 16/43

24th June 2016

Q. 1 Do you agree with our preliminary view that the usage threshold levels should be maintained at the levels set in D08/14? Please give reasons to support your view.

Dublin City Council agrees with the proposal to leave thresholds unchanged. However, Dublin City Council has observations relating to the content of the consultation document:

Clause 10 iii *there is more than 1 payphone on the site and the combined average does not meet the low usage standards;*

Dublin city Council suggests that this clause be amended such that each payphone unit should individually meet the minimum use standards. We agree that where there is evidence of anti-social behaviour and/ or persistent vandalism and this is combined with illegal advertising that the removal of a public telephone kiosk should proceed unless there is clear evidence that the phone usage is regular and includes users accessing public services and freephone services.

Clause 42 *Where public payphones are being used predominantly by vulnerable users, the percentage of calls from these to Freephone and the ECAS would be high and therefore, the condition that no more than 30 seconds of the payphone minutes should be to the ECAS and Freephone should also be maintained.*

When calculating the 30 seconds of payphone minutes for ECAS and Freephone usage, consideration should be given to relevant measurement criteria. For example unanswered freephone calls should not be reckonable. Dublin City Council would caution against any reliance on one variable or indicator of use.

44 *Where these usage criteria are met, the entire payphone kiosk may be removed (unless interested parties want the kiosk left in place for other purposes) and not only the payphone unit. This would prevent the kiosk becoming subject to vandalism or anti-social behaviour.*

Under planning law, planning permission is required for change of use of a payphone to use other than telephony.

6 Dublin Town



Reference: Submission re ComReg 16/43 - Universal Service - Provision of Public Payphones. Review of Usage Threshold for Removals

DublinTown is the Business Improvement District for Dublin City Centre. The organisation was provided with a mandate to represent the city centre's 2,500 businesses following a plebiscite of businesses in 2007. This mandate was renewed in 2012 following a second BID ballot.

DublinTown (formerly Dublin City Business Improvement District) welcomes the opportunity to make this submission to Comreg regarding the provision of public payphones.

Question posed by Comreg - Do you agree with our preliminary view that the usage threshold levels should be maintained at the levels set in D08/14? Please give reasons to support your view.

While levels of use as outlined in the consultation document is obviously one key indicator for the removal of phone boxes, it is just one consideration. It must also be acknowledged that phone kiosks are part of the overall public realm of Dublin City. As part of the streetscape, they have an impact on how people view, use and interact with an area. As such, other considerations should come into play, such as the relative importance for competing uses of space on our streets. Local residents and businesses should be consulted and should be able to petition Eir for the removal of a phone box from the street.

Comreg's own research demonstrates that at 5,855,256 active mobile phones, the national population is well served in terms of mobile phone ownership with approximately 125% market penetration. This poses a question as to the need for active telephone kiosks and the relative opportunity cost for other street space uses.

DublinTown's cleaning crews are regularly called upon to clean up after the mis-use of phone boxes within Dublin city centre. It is found that they are regularly used as public toilets, props for people to beg, rubbish traps and as secluded locations for the preparation and consumption of drugs. Over the last 18 months a number of phone boxes have had to be removed from the city centre at the request of An Garda Síochána due to significant issues of this nature. As recently as December 2015 six phone boxes had to be removed from the Dame Street and South Quays area while further removal of phone boxes has taken place in recent weeks.

DublinTown members regularly complain about the mis-use of phone boxes and it is fair to say that the vast majority of businesses would prefer not have such units on their streets.



Examples of needles recently found in phone kiosks



Vandalised city centre phone box

Unfortunately, not all drug litter can be removed before being discovered by members of the public. This is an obvious concern from a safety point of view for members of the public and can also generate unwanted and unhelpful portrayals of the city centre. As shown in the image below which was used in a prominent newspaper with a wide circulation.



Image used inside an Eircom phone kiosk with a bloody needle used in a newspaper article

From previous consultation around this subject it also seems that Eir(com) would be happy to discontinue its USP obligation, as previously stated during earlier consultations

There is evidence that, with the development of usage in Ireland and the overwhelming presence of a much more efficient and effective form of communication by way of mobile phones, public payphones are in decline and that there is no justification to re-impose a USO.



Drug use in a public phone box in Mary Street

From the consultation document it is clear that public payphones are not widely used for emergency calls with most being in use for less than one minute per day. However, it is outlined in the consultation that there could be a rationale to maintain a small number of public payphones for the use of emergency and Freephone numbers. We would suggest that if any phone boxes are maintained for these purposes that they should be of the open kiosk variety rather than the larger, closed variety. This would help minimise issues around public defecation, litter build up and drug consumption. The smaller open kiosks would also be more accessible for wheelchair users. It has also been suggested that any small number of kiosks that would be maintained could be enabled to function as Wi-Fi hotspots which may be of specific benefit to tourists who otherwise do not use public phone boxes.

We would also suggest that the more open type of public phone would provide better visibility and transparency compared with the more old fashioned boxes which are often used as wrapped advertising stands, as shown in the photo below. The use of such advertising has led to increased mis-use in our experience.



Ad wrapped phone boxes

DublinTown

Ulysses House

22-24 Foley Street

Dublin 1

7 Eircom Limited (Eir)

eircom Group

Response to ComReg Consultation Paper:

**Universal Service - Provision of Public Payphones
Review of Usage Thresholds for Removals**

ComReg Document 16/43



23 June 2016

eir Response to Consultation 16/43

**DOCUMENT CONTROL**

Document name	eircom Group response to ComReg Consultation Paper 16/43
Document Owner	eircom Group
Status	Non-Confidential

The comments submitted in response to this consultation document are those of Eircom Limited (trading as 'eir' and 'open eir') and Meteor Mobile Communications Limited ('MMC'), collectively referred to as 'eir Group'.



eir Response to Consultation 16/43

Executive Summary

eir welcomes this review of the criteria for the removal of public payphones operated under the Universal Service Obligation (USO). This provides a timely opportunity for ComReg to consider and act on the implications of the continuous decline in public payphone usage and to prepare for their number imminently dropping to a level that will render the concept of a public payphones USO entirely unjustifiable.

eir provided strong evidence based arguments in response to ComReg's 2014 consultation on the public payphones USO¹ which highlighted that substitution of payphones by mobile phones in particular has resulted in public payphone usage having dwindled to a level that could not warrant the continued imposition of the USO to provide public payphones. We note that mobile use has continued to increase such that it is the mainstream technology used by the majority of the population for voice services with mobile penetration now at 124.5%². Mobile service is also more affordable and convenient for end users than payphones. ComReg has not provided any objective justification for its continuation of this USO in this current consultation (ComReg 16/43). In particular such objective justification would demand that the costs and any benefits would be quantified and evaluated against each other. In the absence of any such analysis by ComReg, we will show in stark contrast the mounting costs that arise in maintaining ever more isolated payphones relative to the very limited use of the remaining payphones, which is often only marginally above the thresholds set by ComReg.

We therefore urge ComReg to revisit its proposal to increase the 1 minute usage threshold that was set in D08/14 to 2 minutes. This should be accompanied by an additional removals criterion to enable the removal of public payphones that have become isolated and therefore extremely uneconomic to serve. The 30 second limit which discriminates in favour of emergency and freefone usage also needs to be amended such that international calling card services are excluded, as these do not serve vulnerable users, may be distorting competition in the mobile market and therefore do not satisfy ComReg's justification for the favourable treatment of freefone support lines in particular. We also suggest some necessary amendments to the wording of the removals criteria that were set out in D08/14 to reflect the logistics of payphone removals.

Having adjusted the removals criteria, ComReg should immediately address the fact that the current USO is operating in the absence of any objective justification through further consultation on the USO such that an informed and fully qualified decision can be made on this before the end of 2016.

¹ [Consultation on the Provision of Public Payphones, Universal Service: Scope and Designation – ComReg 14/27](#)

² Irish Communications Market: Key Data Report – Q1 2016.



eir Response to Consultation 16/43

Response to the Consultation Question

Q1. Do you agree with our preliminary view that the usage threshold levels should be maintained at the levels set in D08/14? Please give reasons to support your view.

eir does not agree with the preliminary view that the usage threshold levels should be maintained at the levels set in D08/14 for the following reasons;

- The USO designation itself can no longer be objectively justified and absent a removal of the USO designation eir objects to the maintenance of the current thresholds because:
 - The logistical & economic challenges of efficient payphone removal are compounded by the inefficiencies arising from the current designation and removals criteria.
 - the upper threshold must increase to at least 2 minutes to avoid having stranded payphones. This will help to address these inefficiencies while the USO remains.
 - International Calling Cards must be removed from the lower threshold as they do not address ComReg's claimed social inclusion criteria for payphone retention.
 - Adjustments are needed in the wording of the notification requirements as they do not adequately cater for the logistics of removing payphones in batches.
 - There is a lack of an adequate Regulatory Impact Assessment (RIA) of the proposal to retain the current criteria or the alternative options considered by ComReg which has led ComReg to an incorrect preliminary view.

Each of these points is dealt with in turn below.

The USO Designation Itself Should Be Removed

The USO was introduced over a decade ago in the context of a pre-existing and extensive public payphone service throughout the state. At that time, the incremental cost of serving USO obligations was limited due to the high number of commercially viable public payphones. Furthermore, prior to the arrival of affordable mobile phones and the widespread expansion of mobile coverage, public payphones would have been the only low cost, accessible and private means of access for low users in particular. These were the conditions necessary to justify the public payphones USO. Such conditions no longer exist and as eir highlighted in response to ComReg 14/27, there is mobile coverage at all public payphone sites such that all End-Users have an eminently more affordable, convenient, private and accessible alternative to the public payphone³.

There are a growing number of European countries that no longer have a public payphones USO, now totalling 13. Regulators in Austria, Belgium, Cyprus, Denmark, Estonia, Finland, France, Germany, Latvia, Luxembourg, the Netherlands, Poland, and Romania have decided

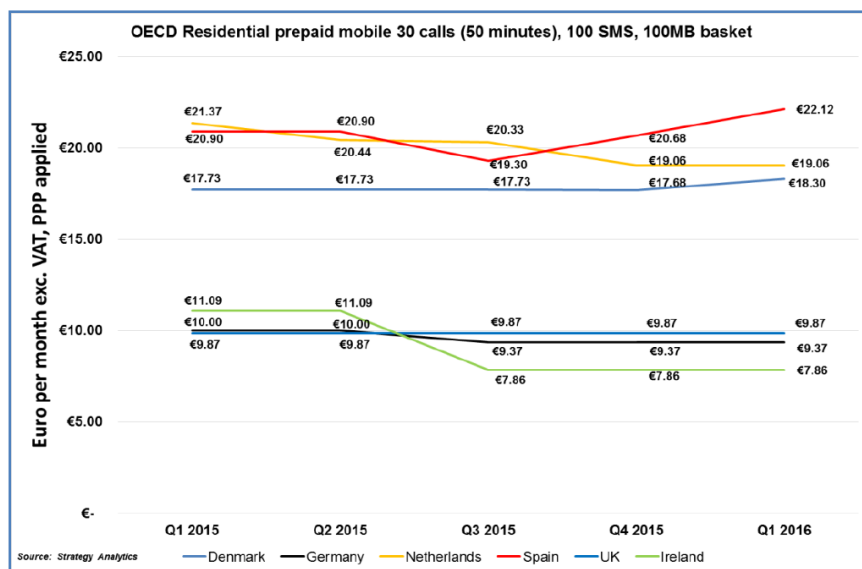
³ "For as little as €15 which would include twenty minutes (€5 worth) of usage. Twenty minutes of usage alone from a payphone would cost €10, demonstrating that the on-going running cost of a mobile phone would be half that of a payphone" – eir response to ComReg 14/27



eir Response to Consultation 16/43

that a USO for public payphones is no longer justified. Invariably they have identified the substitution of mobile services as a key justification for ending the USO. ComReg should have an even more compelling reason for relying on such justification given that mobile phone service in Ireland for low End-Users is according Figure 1 the cheapest among the western European countries used to compare mobile price in its quarterly market report, three of which have seen fit to dispose of the public payphones USO.⁴

Figure 1



Public payphones are not satisfying an un-served need. eir considers, based on the development of the market and market offerings for mobile phone services in particular, that there is insufficient evidence of any need for public payphones to justify the continuation of this USO. Yet ComReg continues to make general unqualified statement such as “payphones continue to provide a basic voice telephony service to many people” (paragraph 16 of ComReg 16/43). At paragraph 46 ComReg refers to the status quo ensuring “that the reasonable need of consumers are met without resulting in additional costs to eir”. Neither the claimed “reasonable needs” nor the real and material cost to eir have been qualified by ComReg. Notably the cost to eir in un-paid USO claims in respect of payphones to date amounts to €~~3~~⁵.

In the context of the average duration of payphone calls in the region of 1-2 minutes per day, ComReg’s conclusions do not have the remotest possibility of being justified. Monthly usage of just 30 or even 60 minutes (reflecting the current and alternative removals thresholds among the options considered by ComReg) are not what should be expected of an individual End-User, let alone a sufficient number of End-Users to qualify as an adequate need. Any claimed need for public payphones is entirely refuted by the far more ubiquitous availability of mobile services along with far lower costs even for low level use. This behoves ComReg to bring forward and prioritise the review of the USO designation as the continuation of the current USO cannot be justified for a further 2 years. Figure 2 demonstrates the degree to

⁴ Irish Communications Market: Key Data Report – Q1 2016. Figure 4.9.2 – Residential Pre-paid Mobile Phone Services Basket (International comparison)

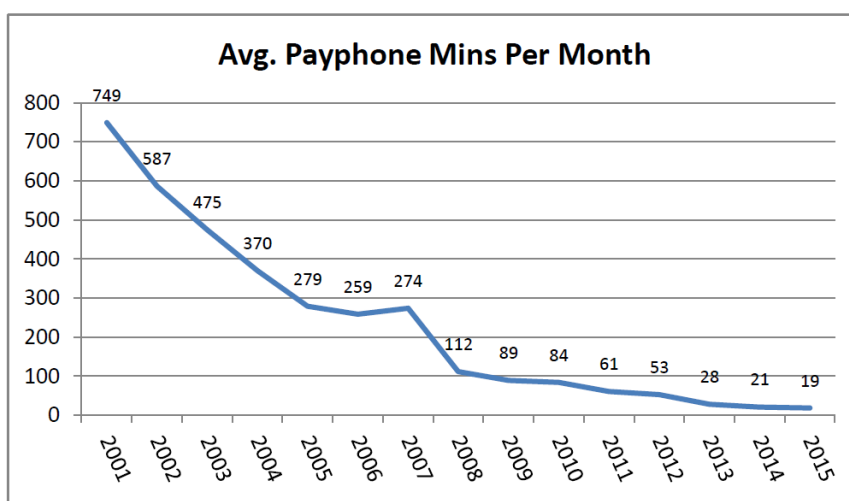
⁵ Direct Net Cost for the financial years 10/11, 11/12, 12/13 and 14/15 combined.



eir Response to Consultation 16/43

which usage has declined since 2001. ComReg is obliged to adopt a forward looking approach to the re-imposition of any USO obligation. Such an approach should not be influenced by any previous USO designation. If ComReg were now considering the imposition of USO designation from afresh, absent any pre-existing obligation, it could not justify reliance on usage that is in terminal decline which now represents just 3% of 2001 usage levels as evidence of a remaining need for payphones, sufficient to justify the net costs that the USO would entail.

Figure 2



At paragraph 28 of ComReg 16/43 ComReg speculates that there may be a migration of usage from removed payphones to other payphones in their vicinity. ComReg states the following:

“The public payphones which would remain do however continue to be used. Indeed, the average usage of these public payphones has increased over the last 12-18 months. This is possibly due to the removal of other public payphones that had been in their vicinity.”

This is entirely speculative. If such migration occurs, it would have occurred in the past, yet the underlying decline in payphone minutes continues. Naturally the decline in the overall average figure has now begun to level off as we reach the stage that the only remaining payphones are those that have always had a relatively higher level of usage. Hence the average is not being diluted as much by those with extremely low usage as these are being removed. It is important to note, however that a limited number of payphones dotted around the country and primarily located in urban areas, cannot be a basis for a public payphones USO.

eir has proposed amendments to the removals criteria that would go some way to addressing the inefficiencies that have arisen from the continued designation of eir as the Universal Service Provider (USP). However the over-riding imperative is that ComReg must now move to address the lack of any remaining justification for the current designation.



eir Response to Consultation 16/43

The Logistics & Economics of Efficient Payphone Removal

ComReg has again remarked that eir has not attempted to remove all phones that are eligible for removal. As we have highlighted in response ComReg 14/27, the economics of removals are driven by the requirement to provide payphones throughout the state. While this remains to be the case, piecemeal removals carry disproportionate costs with significant capital outlay, that can far outweigh potential savings, while doing little to address the on-going operational cost of state-wide provision. The decision to remove payphones from a particular area is also influenced by those payphones that remain. These typically also have very marginal usage.

Furthermore there is an administrative overhead in respect of the notification requirement. This has been compounded in recent months by delays that arise due to local authority licence requirements and increasing costs associated with the reinstatement of payphone sites. ComReg attempts to rely on the time taken by eir to remove eligible payphones as a justification for retaining the current thresholds for removal. On the contrary, if usage thresholds were set to a higher level, payphones with similarly marginal usage would become eligible for removal with the result that eir could remove payphones more efficiently and significantly reduce the geographic area covered by its maintenance team delivering further potential efficiencies.

ComReg claims (at paragraph 13 of ComReg 16/43) to have thoroughly reviewed current public payphone usage however it then goes on to exaggerate the number of payphones that eir could remove based on analysis limited to the upper threshold of 1 minute of usage per day, without taking account of the lower 30 second limit that applies to freephone and emergency calls. As ComReg itself points out, freephone calls alone make up over 50% of total usage. The exclusion of freephone and emergency usage, which ComReg requires eir to analyse and which operates to the most stringent 30 second usage threshold, renders the ComReg analysis meaningless. This exaggerates the number of payphones that eir could remove and thereby compounds ComReg's failure to consider the logistics and economics of payphone removals.

Absent the Removal of the USO Designation the Upper Threshold Must Increase to 2 Minutes to Avoid Having Stranded Payphones

ComReg has limited its review of the removals criteria to the usage thresholds per payphone although it has not considered usage from the End-user perspective. ComReg's approach to the payphone USO is fundamentally flawed. It is based on a flawed premise that because a payphone is used it is meeting a social need for inclusion. However this does not reconcile with the fact that broad areas of the State do not have payphones in any reasonable proximity. Do the vulnerable citizens ComReg considers it is supplying the payphone USO to only live in specific areas? Given the decline in the density of payphone distribution, ComReg now needs to address the fact that we are facing a situation whereby large regions of the country have so few payphones that there can be absolutely no objectively justified or proportionate reason for the continued retention of the USO in these areas.

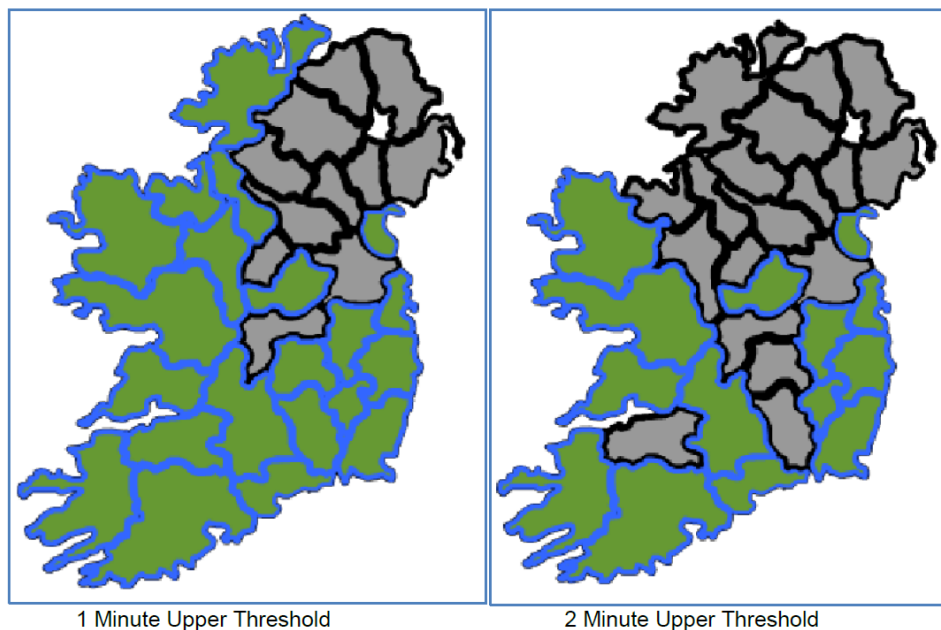
Figure 3 illustrates the dramatic reduction in the USO payphones geographic area that results from an increase in the usage threshold by just 1 minute. This would remove an extra 7 counties from the area to be covered. Using county size as an indicator, this would reduce the geographic area to be covered to 76% of the Republic of Ireland. The distribution of the remaining counties that are covered may lend to the creation of 3 service areas roughly split



eir Response to Consultation 16/43

into an eastern, southern and a western region that could result in a potential reduction in overhead of 20%.

Figure 3 – Payphone Areas Compared at 1 and 2 Minute Upper Thresholds



ComReg has not provided any evidence of any significant End-User detriment nor any objection from either End-Users or their representative groups arising from the exercise of the 1 minute upper threshold. Hence, there is no reason to believe that an increase in the threshold by just one minute per day would give rise to any significant detriment. Therefore we call on ComReg to increase the threshold to 2 minutes.

We compared payphone usage to that of a standard phone subscription in our previous responses. One minute per day compares to 30 minutes per month. This is equivalent to just 60% of the low usage prepaid mobile usage basket that ComReg presents in its Quarterly Market reports⁶; a basket that has been established by the OECD as a means of comparing the price of the typical very low single user of a subscription. This is despite the fact that a 1 minute threshold has been applied to payphones which are supposed to provide service to a large number of End-Users, not just one user. The fact that the USO regulations require ComReg to take account of population density⁷ in the geographic area under consideration suggests that the intention of the USO is to serve a significant number of people with each payphone. It might be reasonable to determine the threshold based on usage levels that would be many multiples of low prepaid mobile usage. ComReg might consider the OECD residential standalone fixed basket as a more appropriate benchmark. This basket assumes 190 minutes of usage per month. Therefore there is ample justification for increasing the threshold by just 1 minute per day to 2 minutes per day, or 60 minutes per month. This would still represent less than 1/3 of typical residential fixed voice usage.

⁶ OECD Residential Prepaid mobile 30 calls (60 minutes) basket.

⁷ Regulation 5 (3) of SI338 2003



eir Response to Consultation 16/43

This also highlights that the usage thresholds alone inevitably give rise to payphones being isolated hundreds of kilometres from the next nearest payphone. This issue has already manifested in the case of 2 payphone locations, County Donegal (in Letterkenny and Ballybofey), which will be the only remaining USO payphone locations in the country based on the July to December 2015 usage analysis. The result being that maintenance personnel would be driving in excess of 160km and taking in excess of 4 hours (including the servicing time) to service 2 sites that in total account for on average 90minutes per month. This is extremely inefficient and contrary to ComReg's duties.

This also influences the timing of removals by eir, as it compounds the inefficiency of piecemeal removal while also calling into question the merit of removing other phones in the area if those locations are being passed in order to service the only remaining location.

ComReg must take account of its obligation to ensure that the USO is applied in an efficient, proportionate and objectively justified manner. Absent a removal of the payphone USO Designation we urge ComReg to set a maximum distance between payphones such that the remoteness of a site becomes a removal criterion along with the revision of the upper threshold to 2 minutes.

Absent the Removal of the USO Designation International Calling Cards Must be Removed from the Lower Threshold

As eir has highlighted in response to previous consultations, the PAC has not been reviewed in a number of years. In the meantime freephone call volumes have dropped dramatically. Retail Payphone charges have increased in light of the fact that fixed costs are being distributed across a lower volume of minutes used. The PAC has not increased accordingly. As a result the PAC is being subsidised. This has the effect of inflating the volume of freephone traffic, particularly in the case of calling card services. Calling card service that operate through freephone numbers are a form of indirect access, providing an alternative means of paying for access to national and international call destinations. Including them in the lower level (30 second) usage threshold unduly discriminates in favour of this form of payment and in turn favours the service providers that offer calling card services, contrary to ComReg's obligation to regulate in a non-discriminatory manner. It also has a distortionary effect as it forces the retention of payphones that are being used for such services where identical usage though standard cash or phonecard payment are subject to the higher threshold. Unlike helpline and emergency service access, they do not service vulnerable End-Users. Therefore the lower 30 second usage criteria should exclude these numbers.

Absent the Removal of the USO Designation Adjustments are Needed in the Wording of the Removal Criteria and Notification Requirements

The timeline presented in the appendix to this response illustrates the implications of having to withdraw payphones in batches demonstrating that it takes up to 3 months to remove a batch of payphones following the notification of removal to ComReg. In addition eir is tasked with identifying whether it is efficient to remove payphones for certain areas where any remaining phones that exceed the removals thresholds in those areas could render the removal of eligible payphones inefficient.

This also highlights the need for adjustments to the wording of the removal criteria and notification requirements.



eir Response to Consultation 16/43

ComReg Decision D08/14 (ComReg 14/69) is made up of two distinct elements;

1. Criteria for permissible removals
2. Notification requirements

Paragraph 4.1 of decision D08/14 states the following:

4.1 The USP is permitted to remove a public pay telephone on a single site where:

ii. the usage in the previous six months of the public pay telephone (while in reasonable working order) has been low, indicating an absence of “reasonable need”....

Usage analysis is likely to be at least a month old when we provide it, due to the lead time required to produce reports. Therefore 4.1.ii should be reworded as follows:

ii. the usage in a **contiguous** six month period (**within the nine month period preceding notification of withdrawal to ComReg**) of the public pay telephone (while in reasonable working order) has been low, indicating an absence of “reasonable need”....

Paragraph 4.3 of decision D08/14 is not consistent with paragraph 4.4. Paragraph 4.3 states;

4.3 The USP must notify ComReg eight (8) weeks in advance of any public pay telephone removal

Whereas 4.4 states:

4.4 The USP must post a notice on the public pay telephone for a minimum period of six (6) weeks in advance of the proposed removal, to clearly inform users of the intention to remove the public pay telephone and include the proposed date of cessation of service and for removal of public pay telephone.

This calls for an amendment to the wording of paragraph 4.3 to state “The USP must notify ComReg **a minimum of** eight (8) weeks in advance of any public pay telephone removal.._eight (8) weeks)..” to be consistent with 4.4.

Lack of an Adequate Regulatory Impact Assessment (RIA)

At paragraph 51 ComReg claims that it is not obliged to carry out a RIA on the basis that it is “not imposing regulatory obligations on eir”. ComReg overlooks the important fact that the onus on ComReg to carry out an RIA also applies to decisions to maintain existing obligations as this has the same effect as the imposition of regulatory measures, an effect which cannot be justified without a comprehensive RIA.

ComReg’s own guidelines⁸ on its approach to RIA, which it was required to put in place on foot of a ministerial direction⁹ state;

⁸ Guidelines on ComReg’s Approach to Regulatory Impact Assessment – ComReg 07/56a. 10 August 2007.

⁹ Ministerial Policy Direction made by Dermot Ahern T.D. Minister for Communications, Marine and Natural Resources on 21 February 2003.



eir Response to Consultation 16/43

“It is incumbent on ComReg to consider the impact of proposed regulatory measures as they may impose a significant burden or cost on stakeholders. ComReg does not want such measures to be overly burdensome....Proper use of RIA should ensure that the most effective approach to regulation is adopted, as it helps determine the impact of any proposed new regulatory measure or process, or any proposed changes to (including the withdrawal of) an existing measure or process on all stakeholders” (emphasis added).

Therefore ComReg cannot excuse itself from its clear obligation and prior commitment to carry out a thorough RIA. ComReg’s draft RIA lacks the necessary detailed analysis that is warranted. The dearth of any quantitative evaluation of the possible impacts of the options under consideration is particularly remarkable. The RIA merely lists options along with speculative effects that have no grounding other than their arising from ComReg’s views. ComReg neglects to consider the cost of piecemeal removals as opposed to the reduction in costs that would be achieved if ComReg decides not to re-designate the USO. With respect to claimed benefits, ComReg’s estimation of claimed benefits from Public Payphones remain entirely un-quantified and without any supporting evidence.

Appendix

Payphone Removals Timelines

	Usage Analysis	Compilation of Analysis	Notification to Coreg	Notification to Public	Public Notice Period	Removal of Payphones
From	01/01/2016	01/07/2016	16/07/2016	01/08/2016		15/09/2016
To	30/06/2016	15/07/2016	(at least 2 weeks in advance of public notice)	01/09/2016	1.5 Months	15/10/2016
Duration	6 Months (As per D08/14)	0.5 Months		1 Month (To visit all Sites)	1.5 Months (As per D08/14)	2 Months (To clear all sites)
10.5 Months						
3 Months						

8 Flood, Mr Andrew

It's time for them to go. They are an eyesore no one uses them. But I would suggest that in certain areas where the phone box once stood perhaps a free wifi spot for tourist to log onto could be installed.

9 Gear, Mr Jeff (Gear Jewellers)

In relation to the existing telephone boxes at Parnell Street, I would like to submit to have them removed. Currently they are being used for a toilet; we have witnessed people urinating in them. Also People smoking inside them, Regular drug taking Personally I would not feel safe inside one of them for fear of mugging or being attacked. If they have to stay in position, there is no reason why they should not be like the American style of an open pole, this would instantly resolve all the problems with unsocial behaviour.

Regards Jeff Gear

Gear Jewellers

Greeg Court Parnell Street

Dublin D01 NY28

Tel 01 814 89 14

www.GearJewellers.ie

10 Helly, Mr Jamie

I'm writing in response to your recent publication "Review of Usage Threshold for Removals" report and wish to make you aware of the level of antisocial behavior that is taking place outside our office on 5 Upper Ormonde quay on a daily basis. Firstly, I'm heartened to see that the Communications Regulator understands that, in some cases, public phone boxes do present a haven for anti social behavior. For our business and the businesses of all our neighbors the levels of antisocial behavior in and around the phone box on upper Ormonde quay has become out of control. To illustrate the plight of our business and our neighbors [both residential and commercial] The follow on pages contain a series of photographs taken over the last few weeks as examples of the abhorrent events that are happening in front of passing children and commuters on a daily basis. In recent history we have been witness to individuals engaging in. Smoking Crack Cocaine Injecting Heroin Taking Methadone Smoking Cannabis Dealing drugs " transacting Defecating on the footpath Urinating Collapsing into coma like conditions Begging Harassing and intimidating passersby Harassing our own staff, [including entering our reception on more than one occasion] The images should tell you everything. We have campaigned to have the phone box removed to the Garda, who say they are powerless. Dublin County Council have told us it an eircom [eir] matter Senior operations in eir have told us we need to take it up with the regulator I note that in your Review document, you highlight the fact the eir are entitled to remove a phone box should there be evidence of antisocial behavior. [see attached 2] Unfortunately, eir are refuting this. Essentially, no one is taking any responsibility to act to prevent activities that are entirely socially unacceptable and ruining local businesses and tourism. Can you please contact me to let me know how the Communications Regulator can help deal with this appalling situation.

11 Hennessy, Mr Darren

Hi there, My 20 cents on public phone boxes !!! Concern points Against : too many in some areas, not enough in more demand areas, poorly managed/ maintained and often can attract anti-social behaviour. If we continue how do we better tackle, to deal with these issues - make it affordable and encourage use as a good option. Concern points Towards : too many people can't afford mobile/ regular contracts and this is increasing - this system provides an option be it only in some cases an emergency to those people - yes we still see people borrowing phones/ finding options as they can't!!! We have significant numbers of homeless people within the country - no access to communications and require charity / access to other persons phone - having a balanced number of these available assists. Lastly in the event of any member of the public having or witnessing an incident and not in possession of a mobile phone / phone lost/ stolen in and so many cases daily - having option available assists. Tourism - the one thing that funds our bread and butter/ we tend to be ignorant and forget - until that time..... Tourists for this will have an option not when do not have cell phone / issue with their sim card etc... Tourism in Ireland is a huge economy - let's not forget it , if we do hold those accountable in the years to come on this decision. Thank you

12 Kiely, Mr Ger

Dear Sir/Madam,

With reference to the above I wish to submit that all Public Telephones Kiosks should be removed forthwith.

In my opinion they:

- No longer serve any useful purpose and their usage is of such insignificance that it cannot serve any meaningful purpose.
- They are unsightly.
- They are regularly and continuously vandalised and or "Graffiti-ed" and thus are a blight on the Streetscape.
- They are a walking hazard that is no longer necessary to tolerate for such as blind and disabled persons.
- Their sole remaining function appears to be the provision of a cheap marketing and advertising tool for one company that can no longer be justified on the grounds of the provision of a public service, as the public no longer have any wish or need to use the service.
- They are dangerous and a potential source of hazard to the public in that they are in a state of disrepair.

Thanking you

Ger Kiely

13 Lyons, Cllr. Donal

Cllr. Donal Lyons P.C.



23 Knocknacarra Park, Galway, T:525522/087- 2333013

Email: donallyons@eircom.net

Working for the Community

Retail Division
Commission for Communications Regulation
Irish Life Centre
Abbey Street
Dublin 1

Reference: Submission re ComReg 16/43

Dear Sir/Madam,

I am forwarding the following submission signed on behalf of members (13) of the Salthill Tourist and Development Association who are requesting the removal of 2 Eir (Eircom) telephone kiosks located on the pavement outside of the Oslo Hotel, Salthill, Galway under Section 4 Removal of Public Pay Telephones due to the fact that both are in a state of major disrepair, there are unsightly, obstructing a busy thoroughfare and at night they are continually being used as urinals in this busy tourist location.

The payphone kiosks telephone numbers are 091-526414 and 091-526106 have been out of order for some time. The kiosks are slowly beginning to be an eyesore, unsightly and take away from the facades of local businesses. The business owners feel that the kiosks in their present condition are affecting their businesses. There are further telephone kiosks located in the Salthill Village area and are located less than 100metres from the kiosks listed above.


Members of the Salthill Tourist Development Association have contacted Eir with a view to having the kiosks removed. This was followed up by a written request forward to Eir on the 4th November 2015. In a subsequent reply 5th November 2015, a representative of Eir stated that "The only way to get the kiosk removed therefore, is to get your local council to request and fund the recovery". If the kiosks can be removed by a request from Galway City Council and them funding the recovery, surely they can be removed by Eir in this instance.

In support of this submission, I attached two signature sheets signed by 13 local businesses who are members of the Salthill Tourist and Development Association requesting the removal of the kiosks, together with copies of photographs of the kiosks in question. Also, included is copies of correspondence of 4th November 2015 requesting the removal of the kiosks and the subsequent reply (5th November 2015) from Eir.

I trust that you will give this submission due consideration.

Thanking you in advance.

Yours sincerely,


Cllr. Donal Lyons P.C.

**Salthill Tourist & Development Assosiation,
228 Upper Salthill,
Galway.**

Contact 0876773915

21.06.2016

Dear sir, to whom it may concern.

We the business people of Salthill and members of the Salthill Tourist & Developement Assosiation would request you to consider the removal of the Eircom double telephone situated outside the Oslo Hotel. The telephone booth is in major disrepair, which is both unsightly and obstructing a busy tourist thoroughfare. For your information panels are missing, one door is falling off and the interior is not fit for public purpose.

We the undersigned would be eternally grateful if you could have some influence in helping us with the prompt removal of this unsightly telephone booth during our very short summer season.

Salthill Tourist & Development Assosiation,

228 Upper Salthill,

Galway.

Contact 0876773915

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IMG_1745.JPG



Hi Donal,

ComReg has designated eircom with the Universal Service Obligation (USO) for payphones:
http://www.comreg.ie/publications/provision_of_public_payphones_universal_service_scope_and_designation_583.104645.p.html.

As part of that designation, where there is "an absence of reasonable need" the payphone may be removed.

None of the Salthill payphones meet that requirement and are therefore not on the current removals list.

ComReg has allowed for Councils to request payphone recovery.

The only way to get the kiosk removed therefore, is to get your local council to request and fund the recovery.

In the interim, I'll organise a visit to the kiosk to make good any necessary repairs.

Hopefully this mail has been useful.

My details are below should you require further information.

Regards,



Ger Kelly
Payphone Product Manager

14 Lyons, Mr F

Dear Sir/Mme,
in relation to your invitation to the general public to send submissions to you regarding Eir's plan to shrink its payphone services I would be grateful if you would allow me to make two submissions, one relating to local issues, the other dealing with general issues.

Yours truly

RECEIVED

24 JUN 2016

SUBMISSION RE PROPOSED REMOVAL OF PAYPHONES.

① I live in Castlerea, Co Roscommon. This is a small to medium sized town surrounded by small villages each between five and eight miles away. Only one of these villages, Ballinlough, has a payphone, so Castlerea is the only town in quite a large catchment to have a street kiosk. In the last year two payphones were taken away from Castlerea, and two remain side by side. A notice ~~to the~~ was posted to the door of one of the remaining coinboxes to the effect that it would be removed in March 2015, but to date both still remain in June 2016. However, both were out of order for many months during this period and were unusable. On 22nd June I checked further afield. Beyond the above mentioned villages are some more small to medium sized towns. I found both Ballyhaunis, Co Mayo and Strokestown Co Roscommon are now both without payphone service. If we take this into consideration it increases Castlerea's catchment area payphonewise. Both payphones in Ballaghaderreen (12 miles from Castlerea) were out of order - I lost money in both of them. Some Asian immigrants were also trying to use them but were unable to insert the coins. They eventually used their credit cards.

I would put it to you that a town the size of Castlerea and its seemingly expanding catchment area should not be left without a payphone. With the exception of the village of Ballinlough it would leave an area with about a 15 to 20 mile radius without a payphone. Usage can not be properly measured wif phones are out of order for long periods. Ideally the phones at both Ballinlough and Castlerea should be retained, but if it has to be an either or situation, I would argue for Castlerea. It has a population of about 3,000, or between 5,000 or 6,000 if we include the wider area. Add to this the steady trickle of tourists, ^{and possible emergencies} and I think there is a compelling case to retain the payphones.

Leanna

2

and the extra revenue per phone this would generate could subsidise phones in towns, villages or even rural locations.

There is also the question of maintaining pay-phones. As stated above, most of the large number of payphones in Galway City did not work when I was there last January. If somebody suddenly needs a payphone, or a tourist is in need of such a service, and attempt after attempt yields only unworking phones, people will stop searching for the service. It will be like there are no payphones and the idea of using one, even if one is available, will not occur to an individual; to use one, will not be in the public consciousness, thereby causing a downward spiral. Indeed, I think to an extent this has already happened, there is a greater demand for payphones than is reflected in complaints about the lack of them. If payphones worked more people would use them.

I notice many payphones which were out of order earlier in the year now work. I do not know why this is, but it should be encouraged.

If having a payphone within easy reach of everybody sounds overly ambitious, perhaps the current system could be supplemented with a network of call offices. Indeed, call offices existed before payphones, people made calls from the local post office and paid over the counter at coinbox rates. This system went hand in hand with the coinbox system until the late '80s. Some internet cafés operate such a system to-day, and it is frequently possible to make calls from hotel reception desks, for a fee. Comreg should take steps to introduce a system where calls can be made from libraries, post offices,

SUBMISSION RE PROPOSED REMOVAL OF PAYPHONES

② Although, the use of payphones is in sharp decline I would argue that there should be a plan to have a public phone service reasonably accessible to all in case of emergency, and to facilitate tourists. There are still a small number of people without mobile phones and a greater number whose mobile has run out of credit at any given time. These people sometimes find themselves in an emergency situation whereby they need to call a taxi ^{if they are stranded} or get in touch with breakdown assistance for their car. Those who run out of credit no longer have the option of making a reverse charge call as this service ceased about two years ago. I notice in city centres you get clusters of payphones together. I was in Cork recently and I counted twelve in Patrick St. and six in Oliver Plunket St. All the other main streets had a liberal supply of kiosks. Most of the phones were in working order. On the other hand I was in Galway about six months ago and the vast majority of the large number of city centre payphones including the railway station did not work. However, at the same time as city centres have large numbers of kiosks, medium sized towns like Ballyhaunis Co. Mayo and Strokestown Co. Roscommon have no payphones at all.

Instead of having clusters of kiosks or double phone boxes in towns, they should be spread more evenly throughout the country. I doubt if every payphone in these city centre clusters pay their way; they must subsidise each other, collectively they possibly pay their way. If this is the case there should be a lesser (but still sufficient) number of phone boxes in city centre locations,

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shops, hotels, local government offices, and service stations etc. Providing a twenty-four hour service would require some imagination, hotels and Garda stations are obvious locations to supply a night service. Residents associations and community groups could assist in getting households to provide such a service especially in the case of emergencies. This would entail a whole new approach to the public phone service. It could be subsidised by all telephone companies rather than just Eircom.

Despite the low usage of public phones, I cannot emphasize enough how necessary they can be in certain situations. As already mentioned above, tourists frequently rely on kiosks and people without mobile phones or without credit can often find themselves in a position where they need them. In summer 2013 the media reported that for security reasons the mobile system would be disabled in Inisfallen, Northern Ireland, during the G8 Summit at which president Obama presided. I do not know if this actually happened, but if such security measures are possible they should not happen without a backup system available in all. I am also aware that Vodafone's mobile network went totally out of order one night during the last six months. Again, the obvious negative consequences following this type of thing hardly need spelling out, a doctor on his way to a housecall in the middle of the night, unable to locate the exact address can call neither the patient nor his wife using his mobile phone.

The current system is not providing a nationwide service. The current options offered by Comreg, either force us to maintain payphones which have one minute usage per day or increase the threshold to two minutes thereby permitting Eir to remove a greater number is not really

4.

offering an option to put in place a good robust public phone system. Comreg's stating that the consequences of implementing Option 2 will result in many people having no access to phone service because large areas will be bereft of coinboxes implies option 2 should not be an option. Comreg's contention that option 2's resultant dismantling of payphones will have the advantage of making available more pavement space for cycle racks etc. is outside Comreg's brief. Comreg exists to ensure the people of Ireland have the best possible phone service. I hope we can trust them to do this.

15 Lyons, Mr J

21 June 2016

Comreg
Block D.E.S.
Abbey Court
Irish Life Centre
Lower Abbey Street
Dublin 1

Dear Comreg

I understand you are looking for submissions re: Éir's proposed removing of fifty per cent of its payphones.

I would like to state that the Dun Laoghaire area has lost more than its fair share in the last few months. The payphones outside Killiney Shopping Centre, all the payphones in Galsthule, some in Dun Laoghaire and Blackrock have been taken away recently. At the moment payphone service between Bray and Dun Laoghaire consists of just two kiosks, one in Ballybrack and one in Dalkey. I would urge you to request Éir not to remove these two kiosks.

I would also like to point out that payphones are not always maintained and go out of order and therefore cannot be used. Éir can then class them as being underused and remove them. Only last month I saw an elderly gentleman trying to use the payphone on Marine Road outside Dun Laoghaire church. The phone would not accept his money, it said it would handle free calls only. Later on I saw him attempting to use the phone opposite S. Michael's hospital, also In Dun Laoghaire. He had a handful of €2 coins, but none would go into the box. I suggested he use 2 €1 coins which worked and he made a call to Cork.

To conclude, could I request that Éir does not remove anymore payphones in the Bray/Dun Laoghaire/Blackrock area. I would particularly request that the Ballybrack and Dalkey kiosks remain. I would also request that the payphones be maintained and kept in working order.

Yours faithfully

16 McDonagh, Ms C

Keep the public phone boxes. Its important that all people have access to a phone if they need it. we cannot assume all people are mobile users. Replace existing boxes with what they replaced the old boxes had more character. they symbolise what life used to be like in ireland in nicer times of simple living and a friendlier country. So keep the public phones please.

17 Phibsboro Tidy Towns

Marian Fitzpatrick, of Phizzfest and Re-imagining Phibsboro, forwarded me on her submission to you regarding the removal of Eir phone boxes in Phibsborough.

I agree with her that they are little used as phone boxes but may attract unsocial behaviour. However, I observed one Saturday morning during our monthly Clean-up that one of the boxes was used by a homeless man seeking hostel accommodation for that night. He was hours on the phone waiting his turn to secure a place.

As the majority of the population use mobile phones it is easy to assume that Eir phones are not required but a few are.

I would recommend that one phone is kept at Doyle's Corner, (but cleaned and tidied up a bit) and one removed, and the two at the Library are removed.

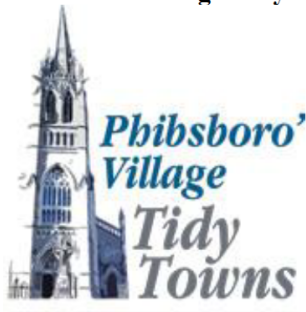
Phibsboro Tidy Towns is trying to beautify the area particularly at the Library. If the Eir phone boxes were removed from there we could put another planter at the railings to go with the three we have planted.

Kind regards,

Susan Dawson (Chairperson).

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Phibsboro' Village Tidy Towns



18 Phizzfest Reimagining Phibsborough Campaign

Dear Jane

On behalf of the Reimagining Phibsborough Campaign, we wish to make a submission to ComReg's consultation process "Universal Service - Provision of Public Payphones: Review of Usage Threshold for Removals."

As residents of Phibsborough, we would like to have the payphones operated by Eir removed from outside the library on the North Circular Road and also those located on the Phibsborough Road at Doyle's Corner. They are a source of continued anti-social behaviour, they are used for urinating in and for drug taking. Admittedly, they are occasionally used to make a phone call - by people standing in out of the rain to make a call on their mobiles! They are also unsightly and foul-smelling urban clutter. The most offensive are those placed outside the library garden railings - one of the rare pleasant public spaces in Phibsborough. These particular pay phone booths outside the library have also become a black spot for illegal dumping, where certain individuals are leaving domestic waste lying up against the phone boxes.

I cannot state our case strongly enough. These phone boxes belong to a past age and their only value in Phibsborough is to people who choose to use them for the anti-social behaviour outlined above.

We would request, therefore that, in line with the wishes of the service provider, Eir, that they be removed from Phibsborough Village.

Kind Regards

Marian Fitzpatrick
087 206 6285

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19 Solitaire Payphones

Our take on this matter comes from what we have witnessed in the UK , decline of street payphone numbers and a continued marketplace in indoor supervised environment payphones. Indeed we supply Euro Coin , ROI Tariff versions of our Solitaire 6000 and 6000 High Security. Our vote on this latest consultation is for thresholds to remain at current levels and for Eir to seek suitable indoor supervised locations where pay telephony services can continue to operate without the anti-social/higher cost aspects of street locations. Any more questions please let us know

Regards Jeff Wilkes
Managing Director
www.solitairepayphones.com
+44 1372 270111

20 Tannam, Mr Frank

Hi,

I am a consumer with comments on this consultation. I do not work in the industry. I have read the consultation document, which was well written, but I feel some additional aspects needs to be considered. --> Public hygiene after drug usage. There is an increase of drug users using payphones and we as a society have a responsibility in terms of hygiene for anyone picking up a handset and breathing in the germs and other foreign matter regardless of how many times they were cleaned. The reality is that Eir are not cleaning the payphones properly (just walk into any payphone and you will see) which is causing a very serious public hygiene issue. --> Terrorism. Payphones are a security risk to the city in terms of terrorist placing a bag inside and walking away inside an enclosed area near the heard of many town/city centres. --> Advertising. A lot of payphones are simply broken. The payphone is being used by eir as a free advertisement board and they could not care less that the phone itself is broken. --> Vandalism. The majority of payphones are run down and a eye sore in some of our key streets. Recommendation: --> Change the criteria to encourage Eir to remove all payphones that do not meet existing minimum call volumes. --> i.e. All payphones that fall below your existing public service threshold must be removed by Eir inside 6 months on public safety grounds. --> Mandatory removal of all enclosed payphones from around main shopping streets in Dublin city centre on terrorism prevention grounds. --> For remaining payphones, have minimum cleaning standards. i.e. payphones are cleaned at least twice a week. Phones are kept in working order. Drug residue is dealt with appropriately. Payphones are a blight, not a service anymore, we need to encourage a socially responsible speedy removal of the remaining payphones.

Thank you, Frank.

21 Women's Aid

WOMEN'S AID

Reference: Submission re ComReg 16/43

Women's Aid is a national organisation providing support services for women experiencing domestic violence. The Women's Aid National Freephone Helpline received 9,308 calls in 2015. The Women's Aid Helpline is the only free, national, 24 hour domestic violence helpline with specialised trained staff, fully accredited by The Helplines Partnership. It is a specialist support service for women experiencing emotional, physical, sexual and financial abuse by a current or former intimate partner.

The Helpline provides vital support and information to individual callers and is a gateway to our other services and local refuges and support services around the country. It became a 24 hours, 7 days a week service from January 2016. Demand has been very high for our new 24 hours Helpline service. In the first three months of 2016, our 'out of hours' service (8pm to 8am) received 1408 calls compared to 315 calls to the 'out of hours' voice messaging service (10pm to 10am) in the same period in 2015.

It is vitally important that the Women's Aid National Freephone Helpline is as accessible as possible to every woman who may need it in every part of the country. We know that some women who call our Helpline sometimes use payphones to make the call. This may be because it is the only private space they have or they have no landline or mobile phone. It may also be that women are afraid of their partner's behavior and how he monitors their every move, including what calls she makes. We note that in consultation 13/119 ComReg found that 26% of Freephone calls from payphones were to a helpline.

Therefore, we believe that the number of payphones in the country should not be reduced as for some women this may be their only access point to the Women's Aid National Freephone Helpline. It is for this reason that we are in favour of maintaining the current usage threshold at the levels set in D08/14.