

**BT Payphones,
PP 05A23,
Delta Point,
Wellesley Road,
CROYDON,
CR9 2YZ**

Ms Diane Burridge
Director of Operations
Uttlesford District Council
Council Offices
London Road
Saffron Walden
Essex
CB11 4ER

15th October 2008

BT's proposal to re-align payphone provision to meet consumer demand.

Dear Ms Burridge

Thank you for your final notification dated 1st July 2008 to our recent consultation on the re-alignment of payphone provision. We have taken some time to review your decisions on the 45 payphones we have notified for removal and on which you recently consulted and we would now like to respond to those decisions in greater detail.

We have attached our comments to your decisions below, and would be more than happy to meet with you to discuss the next steps in moving forward to ensure that provision of call box services remains in areas where there is a reasonable end user need. To summarise, we accept 11 of your objections and can confirm that these payphones will be taken out of our current removals programme. Of the remaining 31 objections, it is our belief that those decisions (as supported by the reasons given) are neither objectively justified nor proportionate, as required by Section 49 of the Communications Act 2003. We would therefore ask that you reconsider these decisions.

Full details for our rationale have been included in the schedule below. In addition, with regard to general concerns about mobile coverage throughout the area BT has conducted a mobile signal test at all 45 of the proposed removal sites. Of these, 42 were each found to have signals from all 4 of the major networks i.e. Vodafone, O2, T-mobile and Orange, so mobile coverage is clearly present at most of these payphone sites.

Although not specifically referred to in the Ofcom guidelines for removal of a Public Call Box, BT's obligation under Universal Service is to ensure the adequate coverage of public call boxes to meet the reasonable needs of end-users in terms of numbers and geographical coverage. In Uttlesford, 65% of the kiosks are rarely used, yet we are challenging on the removal of only 32% of the payphones, which are losing significant money and where there is virtually no use of the service. Therefore it is difficult to see how these services are meeting any 'reasonable' customer need in the community.

Finally, many objections appear to be based on the desire of the local community to retain a traditional red kiosk. Please be aware that BT has now launched a new initiative, Adopt a Kiosk, whereby communities can retain kiosks for heritage and/or aesthetic reasons, with the payphone equipment removed. It would appear that the Adopt a Kiosk programme may meet your requirements and would be worthy of your consideration. All of the details can be found at www.bt.com/payphones. If you feel that there is a need to retain a payphone, despite virtually no use of the service, you may wish to use the above site to sponsor a kiosk - at a cost of £500 each, per annum. This ensures retention of the payphone where there is no or very little demand for the service.

We request that you reconsider your decisions for the attached list of kiosks and send your revised notification to us by **14th November 2008** or if you wish to discuss the attached please contact us via the email address shown below. We are also happy to meet with you to discuss payphone provision across Uttlesford, as we are keen to ensure a balance between an adequate level of geographical coverage and the level of use of the service. However, in the event that these decisions are not reversed, we will consider challenging them as is our right under the Communications Act. Revised notifications should be sent to the following address, BT Payphones, PP 05A23, Delta Point, Wellesley Road, Croydon, CR9 2YZ or via email to btp.authorisation.team@bt.com

Yours sincerely,



RICK THOMPSON
Project Liaison Office, BT Payphones

Item	Telephone Number	Address	Post Code	Call Usage	Objection reasons from UDC consultation summarised by BT	Challenge / Accept (narrative response from BT)	Contribution to consultation	Applied to adopt	Applied to sponsor
1	012452 31217	Pco1, Ongar Rd, Margaret Roding, Dunmow	CM6 1QR	4	Rural environment / usage Emergency use	Call volumes are negligible and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	X	X	X
2	012452 31401	Pco1, The Street, High Easter, Chelmsford	CM1 4QS	88	Rural environment / usage Emergency use Heritage	Call volumes remain low at less than 2 calls per week and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	X	X
3	012453 61466	Pco1, Evelyn Rd, Great Leighs, Chelmsford	CM3 1QQ	6	Rural environment / usage Emergency use Heritage / Worthy of being Listed	Call volumes remain very low at less than 1 call per month and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	√	X	X
4	012795 08660	Pco1, George Green, Little Hallingbury, Bishops Stortford	CM22 7PP	3	Last Payphone in Little Hallingbury & closest Payphone would be two miles away. Rural environment / usage Emergency use	Call volumes remain low at less than 1 call per week and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	√	X	X
5	012797 18211	Pco1, Hammond Rd, Hatfield Broad Oak, Bishops Stortford	CM22 7JW	16	Rural environment / usage Emergency use Heritage	Call volumes remain very low at less than 2 calls per month and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	X	X
6	012797 18221	Pco1, High St, Hatfield Broad Oak, Bishops Stortford	CM22 7HQ	7	Rural environment / usage Emergency use	Call volumes remain very low at less than 1 call per month and there is little evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	X	X	X
7	012797 30324	Pco1, Broomfields, Hatfield Heath, Bishops Stortford	CM22 7EH	4	Rural environment / usage Emergency use Heritage	Call volumes remain very low at less than 2 calls per week and there is little evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	X	X
8	012797 71311	Pco1, Chatter End, Farnham, Bishops Stortford	CM23 1HL	0		Removal agreed by District Council consultation Page 3		√	

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9	012797 71391	Pco1, Rectory Lane, Farnham, Bishops Stortford	CM23 1HT	1	Rural environment / usage Emergency use Heritage	The past 12 months have seen a more usual call usage level at this Payphone Objection Agreed		✓	
10	012797 77242	Pco1, The Street, Berden, Bishops Stortford	CM23 1AS	38	Rural environment / usage Emergency use Heritage	Call volumes remain very low at 2 calls per month and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	✓	X
11	012797 77395	Pco777395, Langley Lower Green, Saffron Walden	CB11 4SB	69	Rural environment / usage Emergency use Heritage Mobile Coverage	A test at this site showed only 2 major mobile networks available. Objection Agreed There are however very few calls made from this kiosk (less than 1 per week) and no evidence of emergency use at all. We would therefore suggest that the Adopt-a-Kiosk scheme is considered.		✓	
12	012798 12220	Pco1, Cambridge Rd, Stansted	CM24 8DA	566	Rural environment / usage Emergency use	Call figures show an improvement in usage in the past year. Objection Agreed			
13	012798 12875	Pco1, Stoney Common, Stansted	CM24 8NH	9	Rural environment / usage Emergency use	Normal call usage remains very low at less than 1 call per week. However there is evidence of emergency calls being made. Objection Agreed			
14	012798 12951	Pco1, Cambridge Rd, Ugley, Bishops Stortford	CM22 6HR	151	Rural environment / usage Emergency use	Call usage has continued to decline in the past year to 1 call per month. There is little evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	✓	X	X
15	012798 50341	Pco1, Brick End, Broxted, Dunmow	CM6 2BJ	0	Rural environment / usage Emergency use	Call volumes are negligible (1 call in the past year) and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	✓	X	X
16	012798 50384	Pco1, Church End, Broxted, Dunmow	CM6 2BU	1	Rural environment / usage Emergency use	Call volumes are negligible (3 calls in the past year) and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	X	X	X
17	012798 70274	Pco1, The Street, Takeley, Bishops Stortford	CM22 6QW	4	Rural environment / usage Emergency use	Call volumes remain very low at less than 2 calls per month and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	X	X	X
18	012798 70321	Pco1, Brewers End, Takeley, Bishops Stortford	CM22 6SB	28		Removal agreed by District Council consultation			

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19	012798 76218	Pco1, St. Martins Close, White Roding, Dunmow	CM6 1RR	4	Rural environment / usage Emergency use Heritage	Call volumes remain very low at less than 2 calls per month and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	X	X
20	012798 76224	Pco1, Stortford Rd, Leaden Roding, Dunmow	CM6 1QX	3	Rural environment / usage Emergency use	Call volumes remain very low at less than 2 calls per month and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	X	X	X
21	012798 76251	Pco1, Aythorpe Roding, Dunmow	CM6 1PT	0	Rural environment / usage Emergency use Heritage	Call volumes remain very low at less than 1 call per month and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	X	X
22	013718 10220	Pco810220 Opp 4 Gridiron Villas, Little Bardfield, Braintree	CM7 4TW	13	Rural environment / usage Emergency use Heritage	Call volumes remain very low at less than 1 call per month and there is little evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	X	X
23	013718 20359	Pco1, Bannister Green Villas, Felsted, Dunmow	CM6 3NN	247		Removal agreed by District Council consultation			
24	013718 20690	Pco1, Garnetts Lane, Felsted, Dunmow	CM6 3ED	0	Rural environment / usage Emergency use Heritage / Worthy of Listing	Call volumes remain very low at less than 1 call per week and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	√	X	X
25	013718 30211	Pco1, Debden Green, Saffron Walden	CB11 3LX	0	Rural environment / usage Emergency use Heritage	There is no usage of this Payphone whatsoever. There is also no evidence of emergency calls. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	√	X
26	013718 30399	Pco1, Cutlers Green, Thaxted, Dunmow	CM6 2QD	40	Rural environment / usage Emergency use Heritage	Call volumes remain very low at less than 1 call per week and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	X	X

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27	013718 56311	Pco1, Pulford Place, Stebbing, Dunmow	CM6 3RL	146	Rural environment / usage Emergency use	Call volumes have reduced further to less than 2 calls per week and there is little evidence of emergency usage. . A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	✓	X	X
28	013718 72320	Pco1, Stortford Rd, Little Canfield, Dunmow	CM6 1SL	2	Rural environment / usage Emergency use	Call volumes remain very low at less than 2 calls per month and there is little evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention.	X	X	X
29	013718 72385	Pco1, Church End, Dunmow	CM6 2AF	8	Rural environment / usage Emergency use Heritage	Call volumes remain very low at 1 call per month and there is little evidence of emergency usage. A test at the site showed that mobile signals from 3 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk.	X	X	X
30	013718 72500	Pco1, Berners End, Barnston, Dunmow	CM6 1LY	653	Rural environment / usage Emergency use Heritage	Call figures show an improvement in usage in the past year. Objection Agreed			
31	013718 74955	Pco1, The Causeway, Dunmow	CM6 2AA	32	Rural environment / usage Emergency use Heritage	Figures have shown a slight improvement to more normal call usage in the past year. Objection Agreed			
32	017638 38296	Pco1, Littlebury Green, Saffron Walden	CB11 4XE	0	Rural environment / usage Emergency use Heritage	There is no usage of this Payphone whatsoever. There is also no evidence of emergency calls. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	✓	X	✓
33	017995 23047	Pco1, Orchard Close, Saffron Walden	CB11 4DQ	1,000	Rural environment / usage Emergency use Heritage	Call figures show an improvement in usage in the past year. Objection Agreed			
34	017995 23062	Pco1, Whiteshot Way, Saffron Walden	CB10 2AN	72	Rural environment / usage Emergency use Heritage	Call levels have improved slightly in the past year. Objection Agreed			
35	017995 30288	Pco1, South Street, Great Chesterford, Saffron Walden	CB10 1NW	4	Rural environment / usage Emergency use Heritage / Opinion shared by Parish Council	Call levels have improved slightly in the past year. Objection Agreed			

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36	017995 40413	Pco1, Wicken Bonhunt, Saffron Walden	CB11 3UG	160	Rural environment / usage Emergency use Heritage	Call volumes have reduced further to less than 1 call per week and there is little evidence of emergency usage. . A test at the site showed that mobile signals from 3 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk.	X	X	X
37	017995 40437	Pco1, Wicken Rd, Newport, Saffron Walden	CB11 3QD	13	Rural environment / usage Emergency use Heritage	Call levels have improved slightly in the past year. Objection Agreed			
38	017995 41992	The Village Hall, Station Rd, Newport, Saffron Walden	CB11 3PL	20	Rural environment / usage / close to BR Station Emergency use Heritage	Call levels have improved slightly in the past year. Objection Agreed			
39	017995 43267	Pco1, Coney Acre, Rickling Green, Saffron Walden	CB11 3YQ	0	Rural environment / usage Emergency use Heritage	There is no usage of this Payphone whatsoever. There is also no evidence of emergency calls. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	X	X
40	017995 50206	Pco1, Pelham Road, Clavering, Saffron Walden	CB11 4PQ	1	Rural environment / usage Emergency use Heritage	Call volumes are still negligible (1 call in the past year) and there is little evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	√	X	X
41	017995 50358	Pco1, Langley Upper Green, Saffron Walden	CB11 4RU	7	Rural environment / usage Emergency use Heritage	Call volumes are still negligible (6 calls in the past year) and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	√	√	X
42	017995 84307	Pco, Steventon End, Ashdon, Saffron Walden	CB10 2JE	13	Rural environment / usage Emergency use Heritage	Call volumes remain very low at less than 2 calls per month and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	√	X	X
43	017995 84394	Pco1, Guildhall Way, Ashdon, Saffron Walden	CB10 2HH	3	Rural environment / usage Emergency use Heritage BT agree it remaining	Call volumes remain very low at less than 2 calls per week and there is little evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	√	X	X

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44	017995 99311	Pco1, Lower Green, Wimbish, Saffron Walden	CB10 2XH	2	Rural environment / usage Emergency use Heritage	Call volumes remain very low at less than 1 call per month and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	✓	✓	X
45	017995 99391	Pco1, Howlett End, Wimbish, Saffron Walden	CB10 2XW	12	Rural environment / usage Emergency use Heritage	Call volumes are negligible (2 calls in the past year) and there is no evidence of emergency usage. A test at the site showed that mobile signals from 4 major networks were available. Reason provided is not supported by usage data so no need for retention. If this is required for heritage reasons please consider Adopt-a Kiosk	X	X	X