



THE RT. HON. JACOB REES-MOGG M.P.
MEMBER OF PARLIAMENT FOR NORTH EAST SOMERSET

HOUSE OF COMMONS
LONDON
SW1A 0AA

Philip Edwards, Esq.,
Clerk to Hinton Blewett Parish Council,
4 Valley View,
Clutton,
Somerset, BS39 5SN.

27th April 2022

Philip Edwards,

Please find enclosed a letter that I have received from Melanie Dawes, Chief Executive of Ofcom, in response to the representations I made on your behalf.

I hope that Ms Dawes' letter is helpful in addressing the concerns you raised, particularly in respect of the requirement of the Ofcom guidance for telecoms providers to have at least one solution for customers who are landline dependent.

With every good wish,

Jacob Rees-Mogg

Enc.

Dame Melanie Dawes

Chief Executive

Email: ChiefExecutive@ofcom.org.uk

The Rt Hon Jacob Rees-Mogg MP

By email

14 April 2022

Dear Mr Rees-Mogg,

Thank you for the email of 6 April on behalf of Hinton Blewett Parish Council, regarding their concerns about the migration of landline phones from the copper network to digital phones. I understand Mr Edwards, the clerk of council, was not satisfied with the response he received to a letter he sent to Ofcom on this issue in February this year. I am sorry that Mr Edwards felt our response did not address all of his concerns, and I hope this letter addresses these in more detail.

First, it might be helpful to set out some background about the changes ahead. Landline phone calls have traditionally been delivered over what is known as the Public Switched Telephone Network ('PSTN'). However, this network is reaching the end of its life and becoming increasingly difficult and costly to maintain. Consequently, BT has taken the decision to retire its traditional copper telephone network by December 2025, and other telecoms providers also plan to upgrade their telephone services, to ensure that our phone services continue to operate in the future.

As a result, telephone calls will instead be delivered over digital technology called Voice over Internet Protocol ('VoIP'), which uses a broadband connection. This upgrade is not just limited to the UK - operators in many other countries are looking to modernise their public telephony networks or have already done so.

Using digital phones in a power cut

As Mr Edwards notes in his letter, unlike some PSTN landlines, VoIP landlines will not work in a power cut unless a back-up solution is in place.

For the majority of consumers, a mobile phone is sufficient to make phone calls, including emergency phone calls, during a power cut. The ability to make an emergency call from a mobile phone depends on a range of factors, such as the distribution of masts in the area and their respective coverage. Because emergency calls from mobile phones are able to 'roam' onto any available network (not just the registered 'home' network), and take priority over other calls and services, they have greater availability than would otherwise be expected.

However, as Mr Edwards points out, some areas (like his local area of Hinton Blewett) suffer from poor mobile reception so some people are reliant on their landline to make emergency calls during a power cut. There will also be people who may not own a mobile phone or struggle to use one. To ensure that consumers can still make emergency calls when they need to, Ofcom has placed regulatory obligations on telecoms providers. In 2018, we published guidance on how providers can meet these obligations for customers using VoIP services. This guidance can be found here: <https://www.ofcom.org.uk/consultations-and-statements/category-2/access-emergency-organisations-power-cut>. This states that telecoms providers must have at least one solution for customers who are landline-dependent, such as a battery back-up unit, that enables access to

emergency organisations for a minimum of one hour in the event of a power cut. This solution must be made available free of charge to customers who telecoms providers determine to be reliant on their landline to make emergency calls during a power cut.

Our guidance is partly based on the fact that typical residential power outages last less than one hour. Some back-up solutions work for longer than this, and battery cover designed to meet the nominal one hour requirement could last for longer if usage is restricted. It is also worth noting that BT and other providers are now looking at options that might provide a greater period of protection. Our guidance is clear that providers must have at least one solution suitable for consumers' needs, and we are closely monitoring the provision of these back-up products.

Mobile phone networks in rural areas

On Mr Edwards' wider concerns about poor mobile coverage in rural areas such as Hinton Blewett, I would emphasize that improving mobile coverage is a priority for Ofcom, and we recognise that access to decent mobile services has become a necessity. We want to see good mobile coverage available to people wherever they live, work and travel.

While 98% of premises in the UK have good outdoor 4G coverage from all four mobile network operators, too many rural areas are left with patchy or unreliable mobile reception. Ofcom welcomed the UK Government's announcement in March 2020 that it had reached an agreement with the four mobile network operators (EE, O2, Three and Vodafone) to deliver a Shared Rural Network (SRN). The SRN is a £1 billion public and private investment programme that will deliver new, improved mobile coverage in rural areas across the UK.

Under this programme, each Mobile Network Operator (MNO) is committed to providing a good mobile service to 88% of the UK landmass by the summer of 2024, and 90% of the UK landmass by 2027. In the South West of England, coverage from all four operators expected to increase from 75% to 87%.

We report on the progress made by the networks against their commitments in our annual [Connected Nations](#) reports and are responsible for assessing compliance with those commitments. If we find that operators have not met their obligations when they are due, we can take enforcement action, including issuing fines of up to 10% of the companies' relevant turnover.

At this stage of the SRN, operators are still developing their plans and it will be ultimately for them to determine where new sites would be most effectively deployed. We expect the operators to begin engaging with the local communities who could stand to benefit over the next 12 months, as their plans become more concrete.

Costs of moving to VoIP services

Mr Edwards also has concerns about potential additional costs of moving to VoIP services, particularly for customers who do not currently take a broadband service. I can reassure Mr Edwards that VoIP services will not require customers to move to a more expensive connection than they currently pay for. In particular, there should be no need to upgrade to a full fibre connection.

Mr Edwards also rightly points out that some customers only take a landline service and do not have a broadband connection (known as voice-only customers). These customers are often older and can

be on low incomes, so it is important that they are protected and are not required to pay for services they do not use in order to keep their landline phone. BT has a universal service obligation to provide landline services to people who request them and the migration to VoIP does not change that. BT has also recently [committed to extend price protections for landline only users](#) for the next five years, meaning voice-only customers will continue to have the prices they pay for landline rental and call charges capped, regardless of what technology is used to deliver them. This means that when these customers are moved to VoIP, they will not be charged any more, even if a broadband connection has to be installed to allow them to move to a VoIP service.

I can assure you that this is an issue which Ofcom is monitoring closely, and on which we are engaging very actively with the major telecoms providers, consumer groups and other industry bodies. We are clear that the industry must support customers during the transition to VoIP in the coming years.

We have recently written to BT, alongside the other main mass market voice service providers, expressing our concerns about how their migration to VoIP was being handled and communicated. We were therefore pleased to see BT's [announcement](#) on 29 March that it is pausing for a few months further migrations to VoIP for customers who do not want to move to the new technology straight away. This should provide the opportunity for BT and other voice service providers to improve the migration process as well as the information provided to, and engagement with, their customers.

I hope that this information is helpful,

Yours sincerely,

A handwritten signature in black ink that reads "Lindsey Fussell". The signature is written in a cursive, slightly slanted style.

MELANIE DAWES

pp. Lindsey Fussell, Group Director for Networks and Communications