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23rd September 2021

Dear

**RE: TELECOMS REGULATION - CALL FOR INFORMATION: FUTURE
CALLER ACCESS TO EMERGENCY SERVICES IN A FIBRE TO
THE PREMISES (FTTP) NETWORK**

On behalf of the Members and Committee of Age Concern Guernsey LBG ("ACG") and I would like to express thanks for including our organization in your consultation and for inviting us to share comments with you in response to the important issue of future caller access to emergency services in a FTTP Network.

We have referred to the explanatory pamphlet provided and discussed the initiative with our Centre Organisers who work most closely with a membership of over two hundred people aged 65+. Our Committee has also provided their informed views which have also been enhanced by a recent meeting with Mr. [X] at Sure. The observations I would like to offer in conclusion to this process are as follows:

Cost of the back-up system

- Any cost of a back-up system for use in emergencies during a power outage will be detrimental to local pensioners who live on a modest income and who are already facing increasing living costs;
- Any increase in the cost of a standard phone line and/or broadband service to include cost of back-ups is also undesirable for the same reason.
- These concerns have to some extent been allayed with confirmation from Sure that there will be no cost to move to fibre and retail charges will be adequate. It was also confirmed that access to The Telephone Assistance Scheme will be provided where funding of the cost price of the back-up system cannot be met by a household in need of its use whether or not they are a Sure retail customer.

Use of mobile phones for emergency services

- Access to, use and availability of mobile phones by older adults/pensioners may require further analysis as it is believed by ACG that large numbers of individuals (whether they live alone or with others) will not have access to a mobile phone 24 hours of the day 7 days per week for a variety of reasons.

Therefore, they could not use a mobile phone in case of emergency during a power cut and resulting fibre outage.

- For the same reason, to increase the availability of mobile phones for use during fibre outages by those who have them or may obtain them, consideration must also be given to removing the 6-month credit expiry limit. This is a known issue for infrequent mobile phone users and if not resolved, it would be a deterrent to older adults who otherwise might consider obtaining a mobile phone as a contingency for unlikely use in power cuts as an alternative to a back-up system or in addition to it.
- In recognition of certain barriers to the use of mobile phones, it was acknowledged by Sure that guaranteed access to 999 services from mobile phones (with or without credit) could be explained and emphasised. Whilst this will not enable all householders to easily use mobile phones as an alternative to a battery system, ACG believes it may serve as a suitable alternative for some.
- ACG would still like to see the credit expiry removed from mobile phones so that important communication links can still be maintained during a power outage for any infrequent mobile phone users. This would be beneficial in addition to the ability to make 999 calls and may encourage further uptake of mobile phones.

Access to and use of the back-up system

- In the interests of appropriate take-up and adequate use including the older adult age range, any back-up system must not only therefore be provided with no barriers to obtaining it (extreme ease of applying for them, rapid deployment / installation, and reliable / unobtrusive maintenance processes), the back-up system must also be extremely simple to use, check and understand on a daily basis.
- Applying any cost to the back-up together with a phone line and/or broadband service and offering discounts or free back-ups only to the most vulnerable in the wider community may require complex assessment and could be discriminatory one way or the other.
- The points above were partly addressed by Sure in their recognition that the network must be ubiquitous and equitable. ACG would strongly support this approach.
- The current thinking on how vulnerable households could be assessed for battery back-up systems, and what, if any, additional support or choice of application/installation processes would be provided as part of the roll-out of FTTP will require further work. Given that Sure seemed willing to consider these points in addition to the standard processes, we have received satisfactory reassurance at this stage. ACG would request continued monitoring of developments in this regard as practical implementation progresses.

Piper Lifeline - Personal Alarm Services

- If back-up systems are the only option and a cost (of any sum) is ultimately applied for the back-up system, the use of back-ups for Piper Lifelines (personal alarms) would become a **significant concern** because this is specifically an emergency service. In such circumstances, we would emphasise that any back-up system must be deployed **free of charge and at the same time** as the Piper Lifeline is installed in conjunction with The Committee for Health and Social Care.
- ACG was informed during the meeting with Sure that battery back-up systems for Piper Lifelines are going to be provided free of charge. This is appreciated and must be upheld throughout the project lifecycle irrespective of any other challenges that may arise. The additional prospects of improved movement-monitoring systems and increased promotion of wrist band devices with Piper Lifelines were appreciated and would also receive support.

Benefit to the community of FTTP

Whilst unrelated to the specific terms of this consultation, ACG would also like to support and acknowledge what we believe to be potentially significant benefits of a FTTP network installed by Sure: increases in broadband speed including difficult to reach properties, possibility of improved quality of voice calls with less (or less intrusive) interference and increased employment opportunities associated with the project and welcome recognition that a diverse workforce, including older adults, is desirable.

The points are intended to be informative and useful. We would encourage, as far as reasonably possible, minimal/subsidised costs to the customer for the battery back-up system from the outset of the fibre service.

Ideally, installation of any battery back-up systems would be **free of charge to all households who require them**. We would encourage further research to determine the number of households who do not have mobile phone services and may require the battery back-up option so that this proposal could be realistically costed and assessed for feasibility.

Should you wish to discuss this response any further, or if you would like to involve ACG and its Members in any research, I would be pleased to hear from you and delighted to support any future engagement processes as required.

Yours sincerely,

David Inglis,
Chairman, Age Concern Guernsey LBG.