



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

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