

From: [Amanda Fasola](#)
To: [Fergus Reid](#)
Cc: [dai](#)
Subject: Re: Age Concern Guernsey Response to Call for Information - Fibre to the Premises
Date: 20 March 2022 17:49:01

Dear Fergus,

Further to the email below and in response to the encouragement it contains to look through the licence conditions and share any comments on difficulties, the following points are referred for your consideration as requested. This is in the spirit of the genuine engagement that we have been very grateful to participate in so far.

For the avoidance of doubt, these observations do not present significant difficulties and Age Concern Guernsey LBG has no objection to the proposed 'Licence Modification'.

Point 1: Guidelines, Section 20

If possible, we would like to include *explicit* mention in the Guidelines (Section 20), about informing consumers that their *Piper Lifeline* will cease to function with Fibre to the Premises (if applicable, together with appropriate reference as to whether the BBU will resolve this fully or not). See notes below:

Note: Similar wording to that used in Guidelines Clause 20.1 could perhaps be suitable for this purpose

Note also: Further information may need to be obtained / understood by the party responsible for the Piper Lifeline functioning in a power outage as to whether it will continue to work. I seem to recall Age Concern Guernsey did cover this point outside of our consultation response, but I have not found any way of confirming without doubt how the Piper Lifeline is powered if the landline phone is operating from a BBU (i.e. whether the Piper Lifeline will continue to work from a landline while that line is powered by a BBU or not). This may be an action for ACG to assist GCRA with

Point 2: Guidelines, Section 22

Is there any benefit including a reference to Piper Lifeline in the information provided by Licensees under Section 22 of the Guidelines?

Note: Although this is of considerably lesser importance than Point 1 above, it is mentioned as an ideal

Point 3: Annex A - Proposed Licence Modification

The proposal to delete the existing and temporary clause 13A in the fixed telecommunications licence of Sure (Guernsey) Ltd. is unlikely to be material to Age Concern Guernsey LBG, however it may be useful to be able to consider what it did say previously. This isn't apparent based on what has been understood from the review of the paper to date.

Note: This may not be an important point at all and it could just be that I have missed the reference to what clause 13A says or means within the body of the published consultation paper and if so, please accept my apologies.

Point 6: Guidelines Section 21 - Information and explanations conveyed to consumers (Accessibility of information)

There is reference in the paper, section 21.1 to information being provided to the consumer 'including that such means as appropriate to age and any mental or physical disability including hearing or visual impairment'.

It is observed that the key aspect to communication that will be important is that the information is provided in a manner that is widely accessible (perhaps within the context of the UK Equality provisions) so that informed decisions can be made by a wide range of consumers on the back-up service they need (similar to the requirement for explicit informed consent under Data Protection legislation but without explicit guidance about 'how' it must be achieved).

Note: As an observation, rather than being prescriptive in this Guideline, perhaps taking an outcome / purpose-based approach to the wording along the lines of 'information being provided to the consumer so that it is

clearly accessible, easily understood and allows an informed decision to be reached on the back-up they need"? GDA may be better placed to research and comment on this point. (These references were updated in the communications section of the Age Concern Guernsey response version for publication).

Note also: It is of course appreciated that the wording and content must respond to a diverse range of contributors based on their original consultation submissions and hopefully the point recognises this. It is also noted based on the publication that there will be no need for consumers to prove their condition, so perhaps age, mental and physical health information will not be specifically available.

Point 6: Multi-occupancy / residential care dwellings

The paper anticipates providing one solution to each 'Subscriber' by household and that businesses are appropriately considered to be outside of scope. These points are noted and appreciated. It is not apparent with the current understanding how individuals resident in care homes will be serviced under these provisions. The care home will be a business - it is therefore anticipated the home will be responsible for providing appropriate back-up and will this back-up (one BBU) purchased give landline service to the entire home? Perhaps this doesn't need to be explicitly covered, it may just be worthwhile Age Concern Guernsey having the opportunity to understand what will happen in these circumstances.

Once again, thank you for this opportunity to represent the Members of Age Concern Guernsey and for your patience in facilitating our submissions.

Kind regards,
Amanda

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