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Amul

## GTT's application to PUC to cease phone box service.

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To: yogmahdeo@gmail.com

Wed, Nov 14, 2018 at 7:42 PM

### GUYANA CONSUMERS

C/o Sub-office 26 First Avenue, Subryanville,

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### ASSOCIATION

Georgetown.

14th November, 2018

The Chairman and Members  
Public Utilities Commission (PUC)  
106 New Garden Street  
Queenstown  
Georgetown.

Copied to Secretary, PUC.

Dear Madam,

**Re: Application to cease Public Phone Box Service being provided by Guyana Telephone and Telegraph Co.**

The Guyana Consumers Association (GCA) hereunder states its position in respect of GTT's above-mentioned application:

(1) GTT claims their Application is based on Clause 11.2 of Condition 11 of their Licence granted in December, 1990 under the Telecommunications Act of 1990. That Clause as well as their entire Licence derive their existence from the Contract struck between Government of Guyana (GoG) and Atlantic Telenetwork (ATN) in June, 1990 and are inextricably bound to #5. 2 and #5. 3 of the Contract.

5. 2 **Maintaining and upgrading quality of Service.** ATN shall cause GTT to keep its equipment and service maintained continuously with international standards. In addition ATN shall cause GTT to introduce in a timely fashion current technological advances (wherever practical, applicable and relevant) to ensure that a high quality of service is always maintained to international standards.

5.3 **Public Interest Services.** ATN shall cause GTT to provide full public interest services including but not limited to, inland telegraph services, public call box telephone services, public emergency services and free telephone directories.

**There is no evidence that GTT has kept the equipment and services maintained continuously with international standards nor have they introduced in a timely fashion current technological advances ensuring a high quality of service to international standards at the call boxes. These boxes do not provide emergency services. Except they had satisfied those conditions, the call boxes they had provided could not have been generally and comfortably used by the public. Accordingly, GTT must not be permitted to evade their obligations of providing call boxes of international standards and must be compelled to do so.**

(2) GTT, in its application assumes that the PUC could vary the 1990 GoG/ATN Contract and not solely the Government of Guyana or the Courts. If that is GTT's position, they should precisely state such so that the PUC could decide whether such varying falls within their authority. GTT must precisely state its position before the PUC could entertain any substantive discussion of their Application.

On the bases of (1) and (2) above we respectfully urge the PUC to dismiss GTT's Application.

If however, the PUC decides to give consideration to GTT's Application, then we would adumbrate the following which would negate GTT's Application:

(3) Of the list of call boxes given by GTT, we have been informally told that several of the phone boxes do not function and have been unfunctional for long periods. In addition, many of these phone boxes are placed where there is no ready and easy accessibility and no emergency services have been installed in any of them.

**(4) The Local Government Authorities in whose territory these phone boxes are installed should be asked whether these phone boxes are functioning, whether they are of international standard, whether they are easily accessible, whether the boxes have emergency facilities and whether such phone boxes are required and would be utilized by the community. Such enquiries from the Local Government communities are a sine qua non before phone boxes are removed since these call boxes are a Public Interest Service and not primarily a profit-making engine.**

(5) GTT should place call boxes at all tourist sites as a public interest service. To remove the call box from the Kaitour Park is unacceptable. All popular tourist sites in all parts of the world have telephone call boxes whether it is Niagra Falls or the Pyramids.

The GCA, on the basis of the above, respectfully recommend that GTT's Application be dismissed and that they are compelled to meet their Contractual obligations and establish phone call booths of international standard at locations in agreement with the Local Government Authorities.

Yours sincerely

J. Deonauth MA, Secretary, Guyana Consumers Association.