



Sam Ghibaldan  
Chief Executive, Consumer Scotland

10 May 2024

Dear Sam,

Thank you for your letter dated 28th March 2024 regarding your concerns around the delivery of the Public Switched Telephone Network (PSTN) switchover. We are responding collectively, given that, as you note, this migration has key implications for the Department for Science, Innovation and Technology (DSIT) and there are some specific implications for rural and remote areas of the UK, including parts of Scotland.

The old analogue landline network, also known as the PSTN, is a privately owned telecoms network and the process to upgrade it to digital landlines is an industry-led programme. Having said that, UK Government is working closely with Ofcom and the telecoms industry, among others, to monitor the migration and ensure that vulnerable people in our communities are protected through this transition.

We want to assure you that the Government is taking the risks associated with this switchover very seriously. The Government's primary objective is to ensure vulnerable people are protected throughout this necessary transition. It is for these reasons we have agreed a Charter of Commitments with the UK's major communications providers, as well as the network operators who maintain the underlying infrastructure. As you note, this has resulted in all major communications providers pausing non-voluntary migrations from the PSTN network as they put in place additional protections.

Furthermore, DSIT is working alongside the Department for Health and Social Care (DHSC) and the Department for Levelling Up, Housing, and Communities (DLUHC) to create a Telecare National Action Plan. This will set out the range of actions Government, the telecoms sector, telecare companies, local authorities and others are taking to safeguard the safety of telecare users throughout the migration from PSTN to digital landlines. We will publish this as soon as we are able – likely by summer.

As part of the Telecare National Action Plan, DSIT is working together with multiple stakeholders including telecoms providers, consumer organisations and charities on

developing a shared definition of vulnerability specific to the PSTN migration. We will also look to publish this as soon as we can.

We agree that public awareness of the migration can be improved. A telecoms industry-funded national communications campaign focused on telecare users is being developed, and we hope this will launch in the Autumn. My officials are working closely with industry, telecare providers and charities on this campaign.

We believe that telecare users are the right focus of this campaign, as a more general message risks creating unnecessary concern or misinformation for the millions of landline customers who need to take no action, including those who have already been moved over.

In the interim, we have published a webpage on GOV.UK about the PSTN migration as a way to increase public awareness. This resource provides guidance about how consumers can prepare for the switchover and where they can find additional information. The webpage can be found here: <https://www.gov.uk/guidance/uk-transition-from-analogue-to-digital-landlines>.

More widely, DSIT and Ofcom engage regularly with industry to monitor their plans for raising awareness of the PSTN switchover. Ofcom has placed an obligation on communications providers to engage in effective communication with customers about any change to their service. Most communications providers will do this on a region-by-region basis, to raise awareness in specific geographical areas where PSTN migrations are taking place.

Your letter also makes the point that unlike some PSTN landlines, digitally based landline services require continuous power supply to function. We are aware that customers are concerned about resilience needs in a power cut, and we understand that this can be of concern. Ofcom, the independent telecoms regulator, has issued guidance on how telecoms companies can fulfil their regulatory obligation to ensure that customers have access to emergency services during a power cut. The guidance was issued following a consultation with the general public as well as telecoms providers and Ofgem based on data on the average length of UK power outages.

This guidance states that providers should have at least one solution available that enables access to emergency organisations for a minimum of one hour in the event of a power outage in the premises. This solution should be suitable for customers' needs and should be offered free of charge to those who are at risk as they are dependent on their landline. You can read Ofcom's full guidance at the following address: [https://www.ofcom.org.uk/data/assets/pdf\\_file/0016/123118/guidance-emergency-access-power-cut.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0016/123118/guidance-emergency-access-power-cut.pdf).

I should add that these are minimum standards, and in practice many providers are offering solutions which exceed them, such as longer life battery back-up units and 4G enabled handsets. Indeed, the Communications Providers who have signed the PSTN Charter have committed to work towards providing solutions that go beyond the Ofcom minimum of 1 hour of continued, uninterrupted access to emergency services in the event of a power outage.

The resilience of the UK's fixed and mobile telecoms networks is of paramount importance.

For this reason, the Secretary of State for DSIT asked Ofcom last year to review the general resilience of telecommunications services in the event of prolonged power outages. In response, in December 2023, Ofcom launched a [consultation](#) on the resilience of the sector that included a separate call for information on power backup for mobile phone networks in order that they provide a resilient alternative to land-lines. The consultation closed on 1<sup>st</sup> March and we await the outcome of the consultation.

We are aware that Scotland faces specific connectivity challenges. The Shared Rural Network (SRN) programme offers a generational opportunity to drastically improve the availability of mobile network coverage across Scotland, and we are keen to make sure that residents and businesses benefit.

Scotland has the lowest geographic 4G mobile coverage in the UK. For this reason, around 75% of all government spending on the SRN, circa £300m in the Total Not-Spots (TNS) and circa £75m in the Extended Area Service (EAS) parts of the programme, will be directed at improving coverage in Scotland.

The four Mobile Network Operators (MNOs) and their suppliers are currently establishing where masts should go to deliver the best coverage by carrying out site suitability surveys. This includes engaging with landowners and agents to discuss access arrangements, and where necessary, operators will consider alternative options. Stakeholder engagement by the MNOs is ongoing across Scotland and the Highlands so community concerns are heard. At each potential location, there is an individual assessment taking account of a wide range of factors including consideration to areas of natural beauty. All new masts will, of course, then go through the proper planning process.

Lastly, we would like to note that there is an ongoing and growing risk associated with vulnerable households and telecare users relying on the existing PSTN network. Data from Ofcom's latest "Connected Nations" report highlights a growing number of incidents related to PSTN failures. In 2023, there was a 20% increase in PSTN incidents, leading to a 60% increase in lost service hours. We expect these numbers to grow year-on-year as the old network reaches the end of its lifespan. This shows that inaction is not an option.

We thank you again for your letter and hope that this information is helpful.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alister Jack'.

**THE RT HON. ALISTER JACK MP**  
**SECRETARY OF STATE FOR SCOTLAND**

A handwritten signature in black ink, appearing to read 'Julia'.

**JULIA LOPEZ MP**  
**MINISTER OF STATE FOR DATA AND DIGITAL INFRASTRUCTURE**