



Commission for
Communications Regulation

Approval for amendment to Technical Standards to allow EVDSL Services

Information Notice

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An Coimisiún um Rialáil Cumarsáide

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Additional Information

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Text of Information Note

ComReg has approved a request from Eircom to change the technical standards¹ relating to the provision of broadband services. This change will allow high speed broadband services to be made available to an additional 110,000 homes and premises which cannot currently avail of high speed broadband. Taken together with a similar decision made in December 2014 an additional 248,000 households and businesses will be able to avail of high speed broadband in towns across the country.

The technology used to provide these broadband services is known as VDSL (Very high Speed Digital Subscriber Line). VDSL is currently deployed from street side cabinets. The change now allows VDSL to be used on lines that are not connected to a cabinet but are connected directly to an exchange. In this circumstance the technology is referred to as Exchange launched VDSL or EVDSL.

Due to the technical characteristics of Exchange launched VDSL there was a possibility that customers currently served by cabinet based VDSL (CVDSL) services might experience a degradation in service quality should EVDSL be permitted on Eircom's network. This is due to the risk of electrical interference by EVDSL on CVDSL services as the same technology, VDSL, would be concurrently deployed at different points on Eircom's network i.e. exchange and cabinet. The proposal therefore needed to be tested rigorously before launch in order to understand the materiality of this risk. It also was necessary to consult with the operators who use Eircom's network in case their customers might be affected. Ultimately, ComReg approval for the change was required.

After an initial assessment of Eircom's proposal in May 2014 operators did not agree that there had been an adequate assessment of the risk of interference. They questioned the conclusion of the initial risk analysis that there was no risk. Rather, they considered that there remained serious concerns that CVDSL customers would be impacted by the proposed introduction of EVDSL services. As progress was not being made in these discussions, ComReg intervened in order to independently establish if these concerns were justified and to assess whether end user's services would be affected materially and to consider the extent of the risk of interference that would justify withholding approval for the change to the technical standards.

ComReg engaged independent consultants, TNO², to assist with this assessment of the proposal to amend the CLFMP and the risk analysis which supported it. After completing their review of the test data, and operators' submissions on the proposed change, TNO determined that the results of the analysis undertaken by Eircom did not conclusively demonstrate that there was no risk in all circumstances. TNO's analysis determined that there was a risk of interference in certain circumstances and recommended that this risk be quantified and steps be identified in

¹ Known as the Copper Loop Frequency Management Plan (CLFMP).

² Netherlands Organisation for Applied Scientific Research, an independent research organisation.

order to mitigate this risk³. In their report TNO also identified circumstances where there was no risk of interference and EVDSL could be allowed. In December 2014, there was industry agreement and ComReg approval for EVDSL services to be made available for a particular category of lines, amounting to 138,000 lines.

ComReg commissioned TNO to carry out a further analysis in the case of the remaining lines, approximately 110,000. TNO carried out this work and provided a second report⁴ to operators and ComReg on March 18th 2015. Following a period of discussions, and informed by TNO's recommendations, Eircom proposed an approach which allows for the introduction of EVDSL on these lines and significantly reduces the risk of interference to CVDSL services. All operators agree that the technical issues, pertaining to the risk of interference due to the introduction of EVDSL have now been appropriately addressed, particularly as Eircom has proposed risk mitigation strategies and committed to ensuring reported faults arising from CVDSL service degradation relating to EVDSL rollout will be resolved. However some operators have withheld agreement to the change to the technical standards due to other matters related to the rollout of EVDSL.

Both TNO reports are published with this Information Note.

ComReg for its part has considered the issue in the round. We note that not all operators agree to the change, however we do not consider that the other matters raised by operators should delay changing the CLFMP. After reviewing the results of the analysis and having facilitated extensive industry engagement on the issues we consider that the risk of interference to existing end-users is limited. We also note that Eircom, as the network operator, has undertaken to monitor the impact of the rollout of EVDSL and has also committed to resolving broadband service degradation issues should they arise. ComReg has requested a submission from Eircom detailing its commitments regarding risk mitigation and remediation of service degradation.

We are also very much aware of the desirability of making high speed broadband services available to an extra 110,000 households and businesses. ComReg is of the view that the substantial benefit to customers of increasing the availability of high speed broadband substantially outweighs any associated risks and has, accordingly, approved the change to the CLFMP on the basis that it will come into effect once ComReg is in receipt of satisfactory assurances from Eircom regarding the processes to be put in place to ensure existing services and end-users are appropriately protected. ComReg will issue a further information notice once these assurances have been received.

³ TNO report 2014 R11646 Evaluation of the proposal to allow VDSL2 from the local exchange (EVDSL) in Ireland - Technical evaluation of the CLFMP amendment proposal, dated 18 Nov 2014

⁴ TNO report 2015 R10267 - Impact Analysis of VDSL2 from the local exchange (EVDSL) on VDSL2 from the cabinet (CVDSL) For the Irish access network, dated 18 March 2015.