



An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

# ComReg Consumer Line Statistics Report

Q2 2020 – 1 April to 30 June 2020

## Information Notice

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**An Coimisiún um Rialáil Cumarsáide**  
**Commission for Communications Regulation**

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# 1: Executive Summary

ComReg's Consumer Care team manage consumer contacts in relation to Electronic Communications Services (ECS), Premium Rate Services (PRS) and postal services. This publication includes information on issues raised by service providers' customers and recorded by ComReg in Q2 2020<sup>1</sup>.

In Q2 2020, ComReg's Consumer Care team recorded approximately 27,000 contacts and 11,269 issues. This is a notable increase when compared to Q1 2020, where 9,941 issues were recorded, and approximately 23,000 consumer contacts were received. ComReg's Consumer Care team managed approximately 7,000 Service Provider contacts during Q1 2020 and Q2 2020. 84% of all issues recorded were queries and 16% of all issues were complaints. 52% of all issues recorded relate to ECS, 40% relate to PRS, and 8% relate to 'Not for ComReg'/Other. PRS SMS Subscription issues accounted for 39% of all issues recorded.

In Q2 2020, ComReg's Consumer Care team recorded 843 Mobile Service Provider issues for Eir. 625 issues were recorded for 3. 507 issues were recorded for Vodafone. The median resolution time for Mobile Service Provider complaints was 8.0 working days, compared to 13.0 working days in Q1 2020. The average number of complaints per 100,000 subscribers was 7.5, compared to an average of 6.2 complaints per 100,000 subscribers in Q1 2020.

In Q2 2020, ComReg's Consumer Care team recorded 2,064 Fixed Service Provider issues for Eir. 241 issues were recorded for Sky Ireland Limited. 184 issues were recorded for Virgin Media. 449 issues were recorded for Vodafone. The median resolution time for Fixed Service Provider complaints was 6.0 working days, compared to 12.0 working days in Q1 2020. The average number of complaints per 100,000 subscribers was 62.7, compared to an average of 47.7 complaints per 100,000 subscribers in Q1 2020.

## Covid-19

Government restrictions introduced 28 March 2020 called for all work to be completed from home aside from those working in essential health, social care or other essential services.

The majority of ECS providers have advised ComReg that their Customer Care contact centres have been operating at pre-Covid 19 business as usual levels from mid-June 2020.

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<sup>1</sup> The basis for inclusion is where the total number of ECS and PRS issues recorded in the relevant quarter is in excess of 100 and 40, respectively.

## 2: Consumer Contacts

In Q2 2020, approximately 27,000 consumer contacts were received by ComReg’s Consumer Line. ComReg’s Consumer Line is available from Monday to Friday 8.00am to 8.00pm and Saturday 9.00am to 1.00pm. Figure 1 below shows the split of these contacts by channel<sup>2</sup> over the last four quarters. In Q2 2020, phone and e-mail/online form continued to be the most popular methods of contact. ComReg’s Consumer Line received approximately 7,000 service provider contacts in Q1 2020 and Q2 2020.

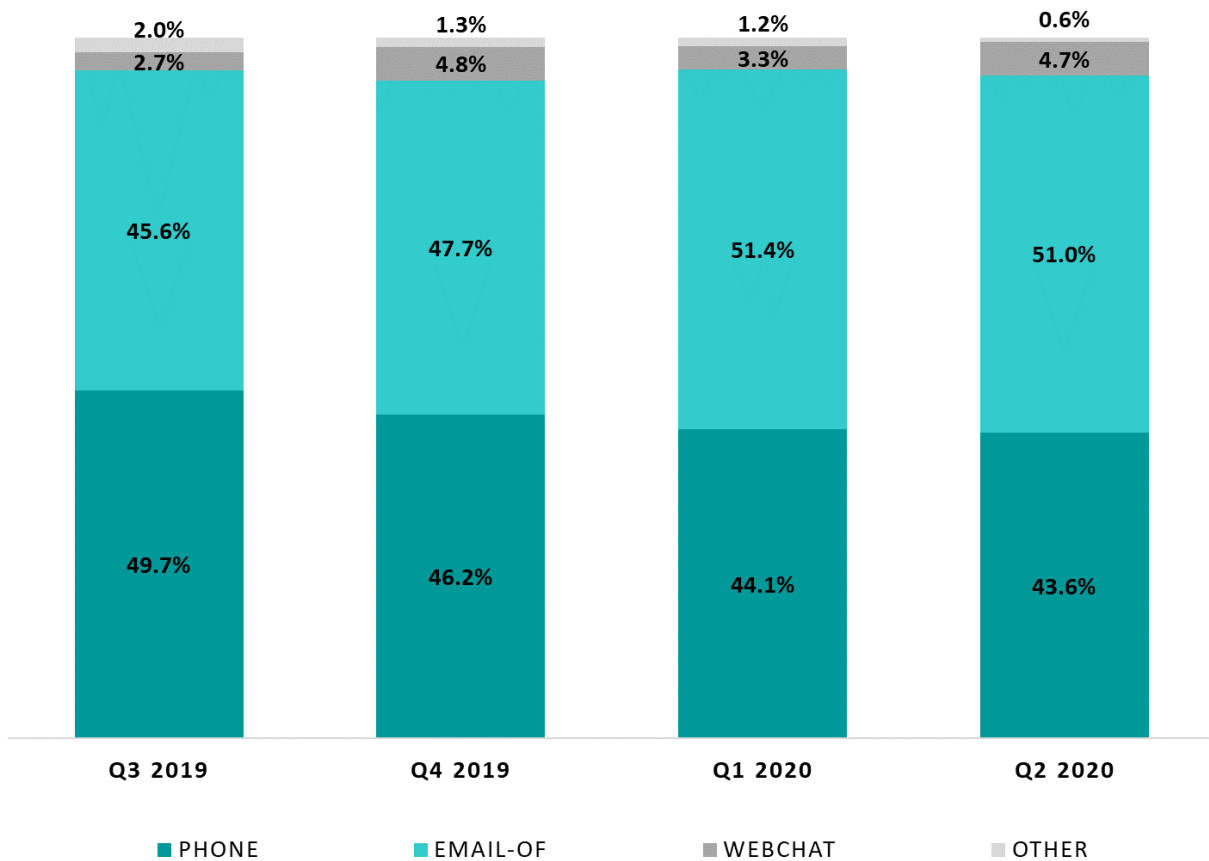


Figure 1: Split of contacts to ComReg’s Consumer Line by channel Q3 2019 – Q2 2020

<sup>2</sup> The contact channel ‘Other’ includes contacts received by letter and SMS. For further details on ComReg’s Consumer Line contact channels, see Annex 1.

# 3: Consumer Issues Recorded

## 3.1 All Issues Recorded

In Q2 2020, ComReg recorded 11,269 issues which are classified across three main categories: ECS, PRS and 'Not for ComReg/Other'. There was a 14% increase in the total number of issues recorded compared to Q1 2020; ECS issues increased by 14%, and PRS issues increased by 16%. Figure 2 shows the trend in number of issues recorded over the last five quarters, which allows for a seasonal comparison of issues recorded in Q2 2019 to Q2 2020.

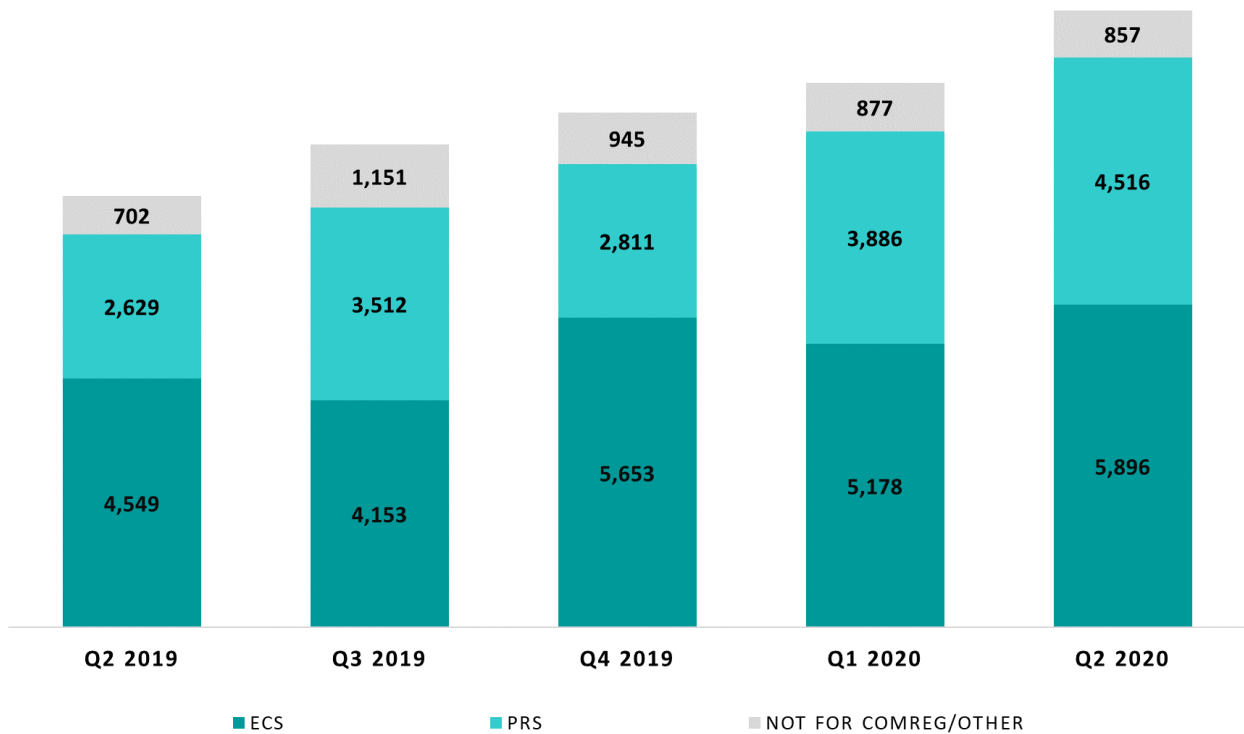


Figure 2: Number of issues recorded Q2 2019 – Q2 2020 by category

In Q2 2020, 52% of all issues recorded were in relation to ECS, while PRS and 'Not for ComReg/Other' issues accounted for 40% and 8% of all other issues, respectively. Figure 3 below shows the split of these three category types.

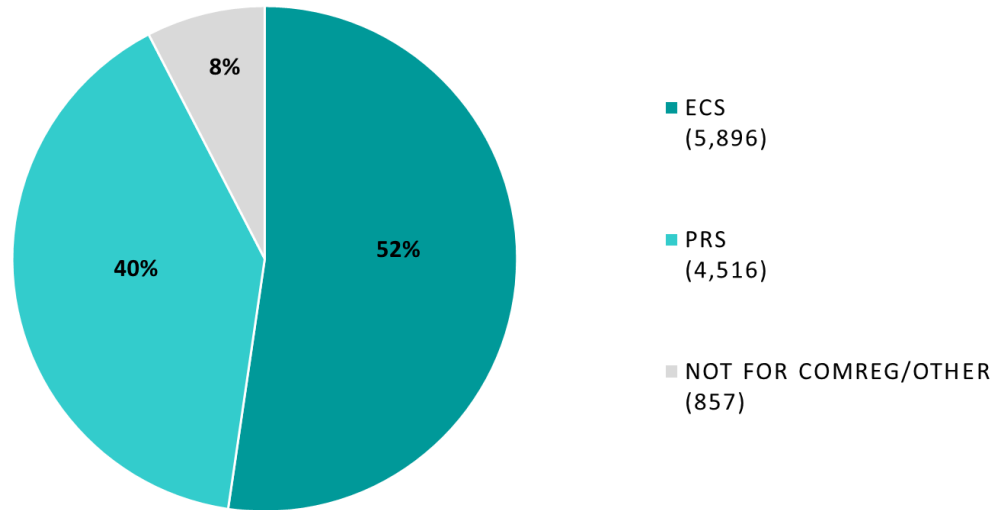


Figure 3: Split of all issues recorded in Q2 2020 by category

### 3.2 All Issues Recorded by Classification Type<sup>3</sup>

In Q2 2020, a total of 11,269 issues were recorded by ComReg’s Consumer Line. The categories ECS and PRS are further split by classification type, which indicate the nature of the issue, such as an ECS Billing Issue. Figure 4 below shows the number of issues recorded for each classification type, comparing Q1 2020 to Q2 2020.



Figure 4: Number of issues recorded by classification type Q1 2020 vs Q2 2020

<sup>3</sup> See Annex 3 for Classification Type Index and Annex 2 for Mobile Coverage Service Issue details.

### 3.3 All Issues Recorded by Queries vs Complaints

ComReg’s Consumer Line records two types of issues: queries or complaints. In Q2 2020, 84% of all issues recorded were queries, and 16% were complaints. Of the 9,405 queries recorded in Q2 2020, 48% were in relation to ECS and 43% were in relation to PRS. Of the 1,864 complaints recorded, 74% were in relation to ECS and 26% were in relation to PRS. For further detail on the highest volume ECS issues recorded, see Figure 10 and Figure 21.

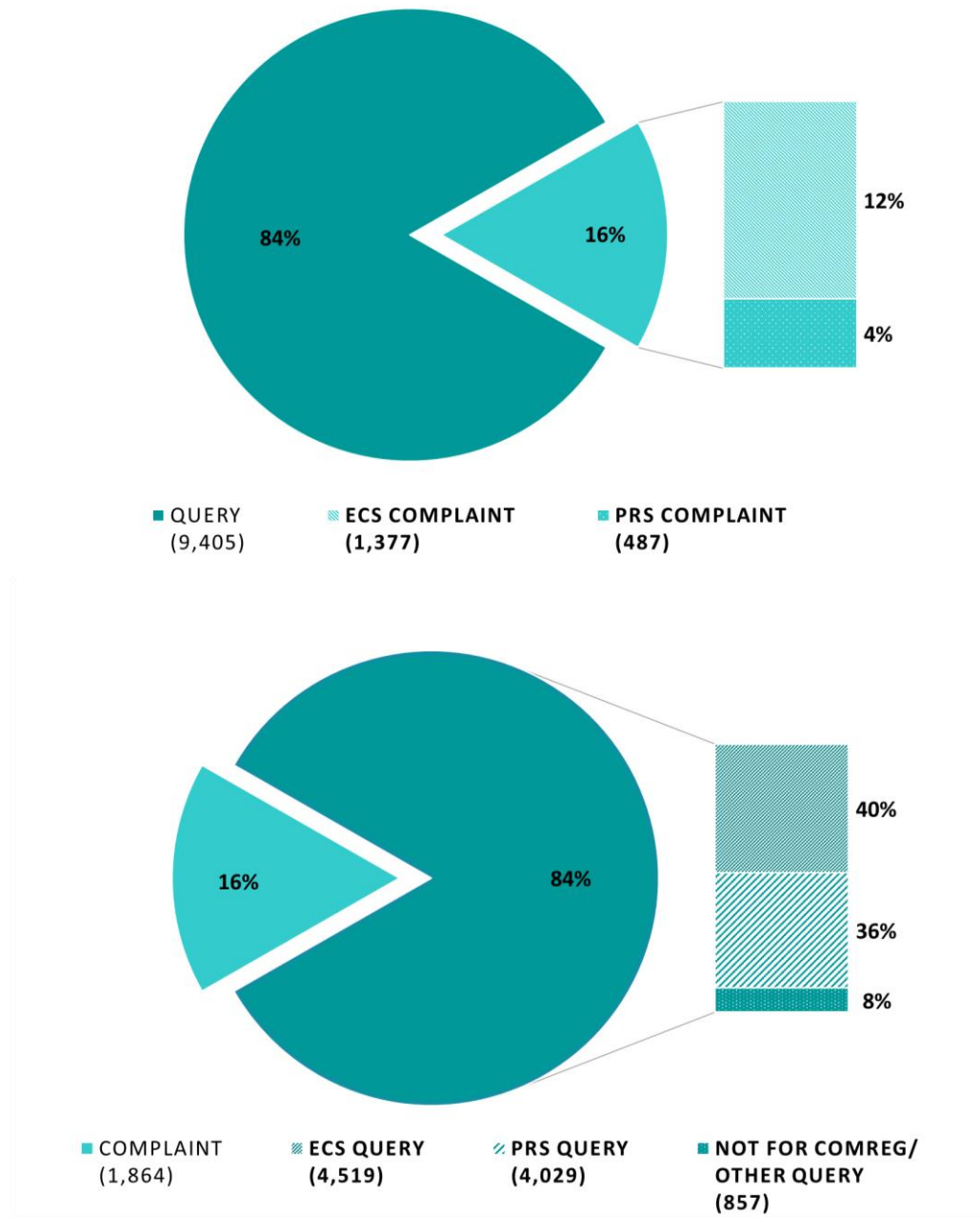


Figure 5: Split of issues recorded by issue type and category Q2 2020



Figure 6 shows the trend of ECS and PRS issues, split by query and complaint, over the last five quarters, which allows for a seasonal comparison of issues recorded in Q2 2019 to Q2 2020. From Q2 2019 to Q2 2020, ECS queries increased by 24% and PRS queries increased by 66%; ECS complaints increased by 52%, and PRS complaints increased by 142%. See Figure 16 for detail on PRS issues by ECS Provider and short code. See Figure 9 and Figure 20 for a breakdown of ECS complaints by classification type.

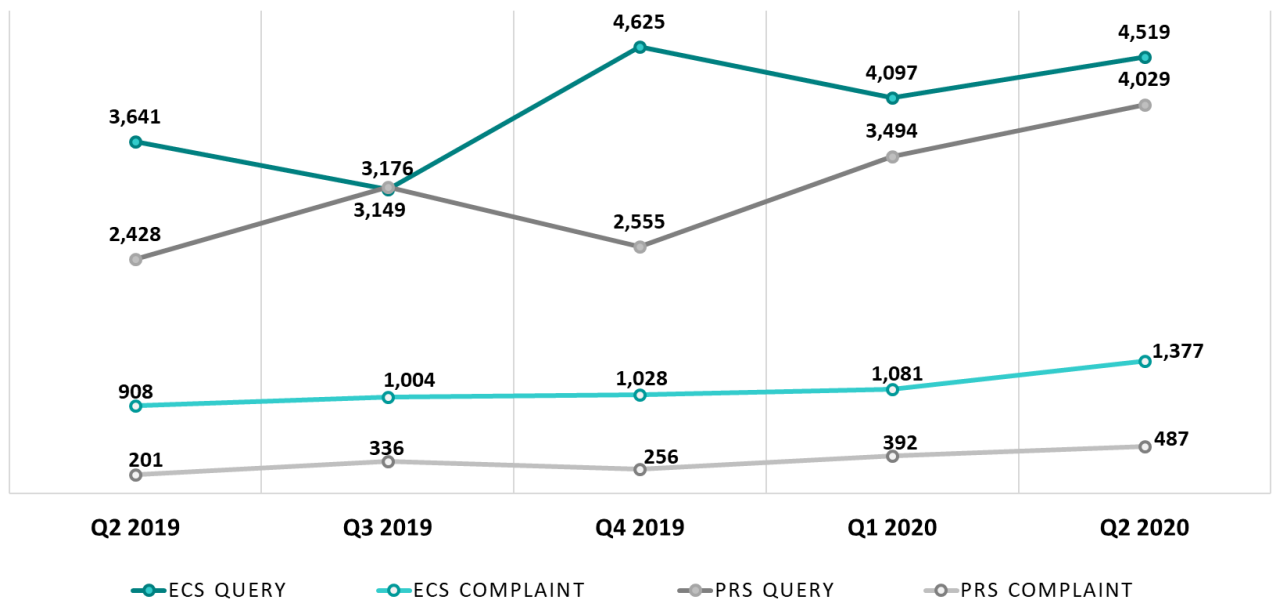


Figure 6: ECS and PRS complaints and queries recorded Q2 2019 – Q2 2020

# 4: Mobile Service Provider Statistics

## 4.1 Mobile Service Provider ECS Queries vs Complaints

Figure 7 shows the number of ECS queries and complaints recorded for Eir<sup>4</sup>, 3 and Vodafone, comparing Q1 2020 to Q2 2020. The overall number of ECS issues increased by 14% from Q1 2020 to Q2 2020.

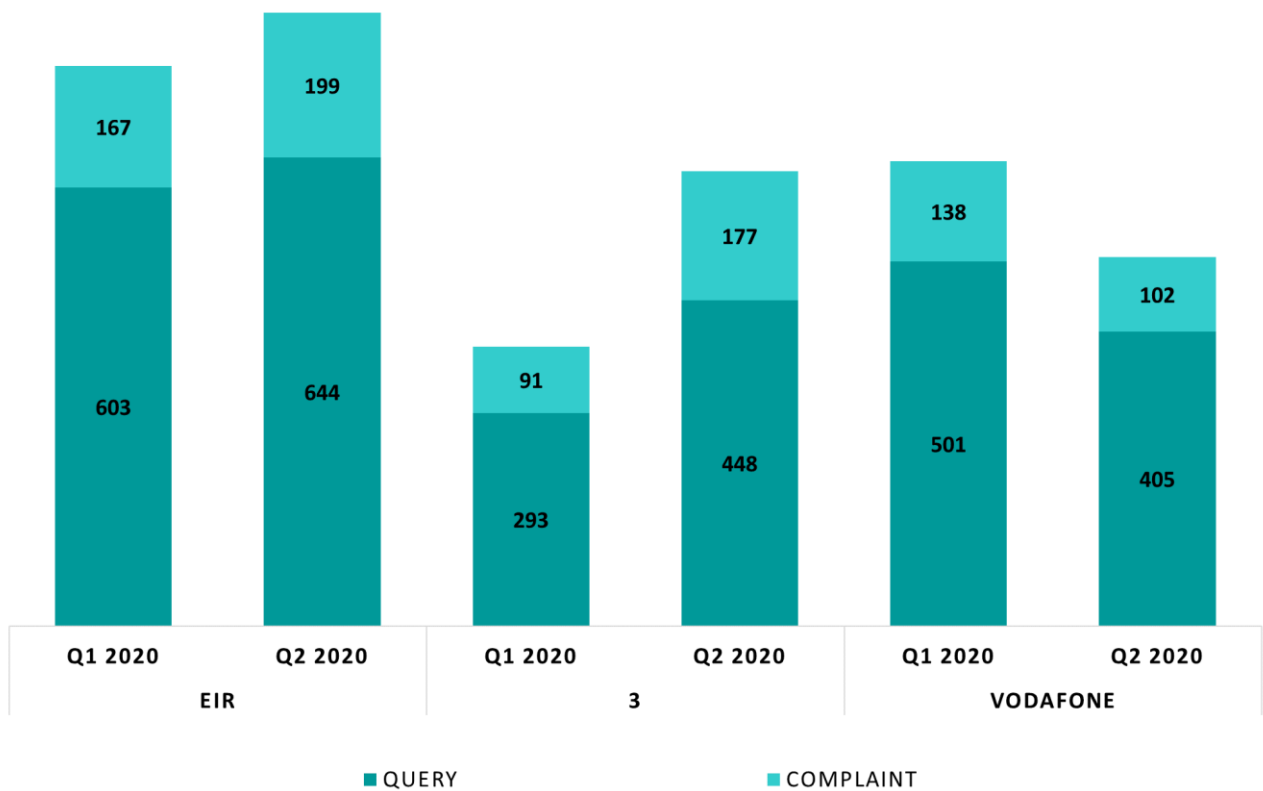


Figure 7: Number of ECS queries and complaints by Mobile Service Provider Q1 2020 vs Q2 2020

<sup>4</sup> On this chart, issues recorded for GoMo are included in Eir’s figures.

Figure 8 shows the split of queries to complaints recorded for Eir<sup>4</sup>, 3 and Vodafone, including the total industry average, comparing Q1 2020 to Q2 2020. The ‘industry average’ is based on all issues recorded within each quarter for all Mobile Service Providers.

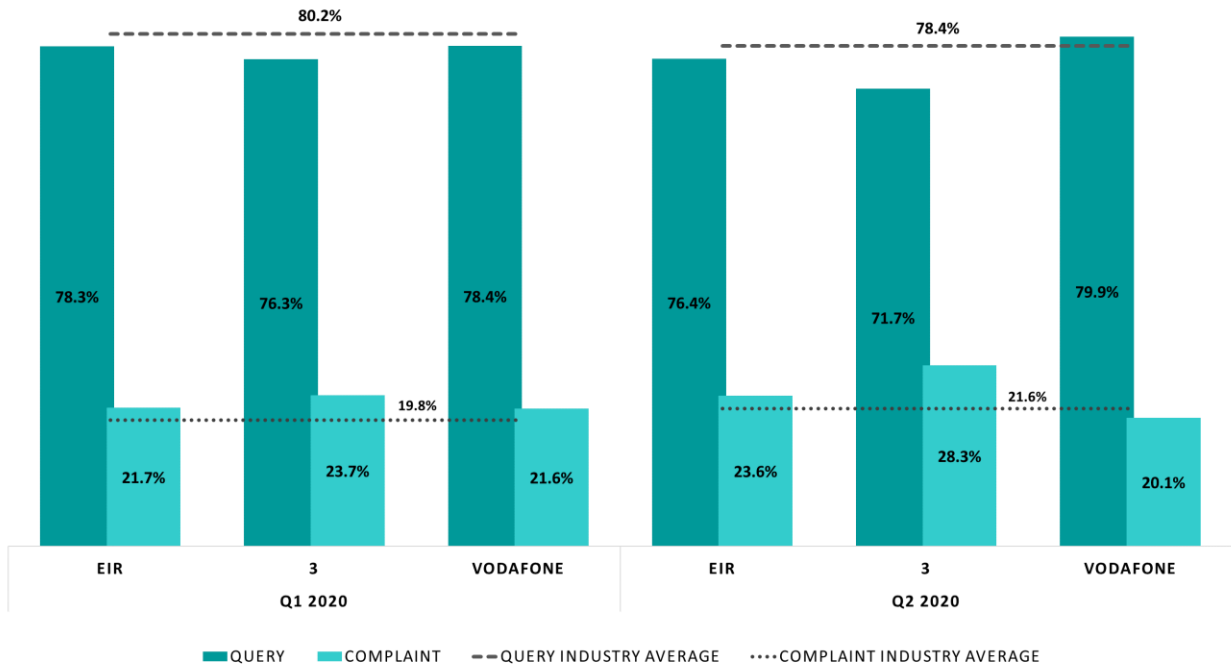


Figure 8: Split of ECS queries and complaints by Mobile Service Provider Q1 2020 vs Q2 2020

## 4.2 Mobile Service Provider ECS Complaints by Classification Type

Figure 9 shows ECS complaints by classification type for each Mobile Service Provider<sup>4</sup> listed in Figure 7, comparing Q1 2020 with Q2 2020. For details of the highest number of issues recorded for each Mobile Service Provider, see Figure 10.

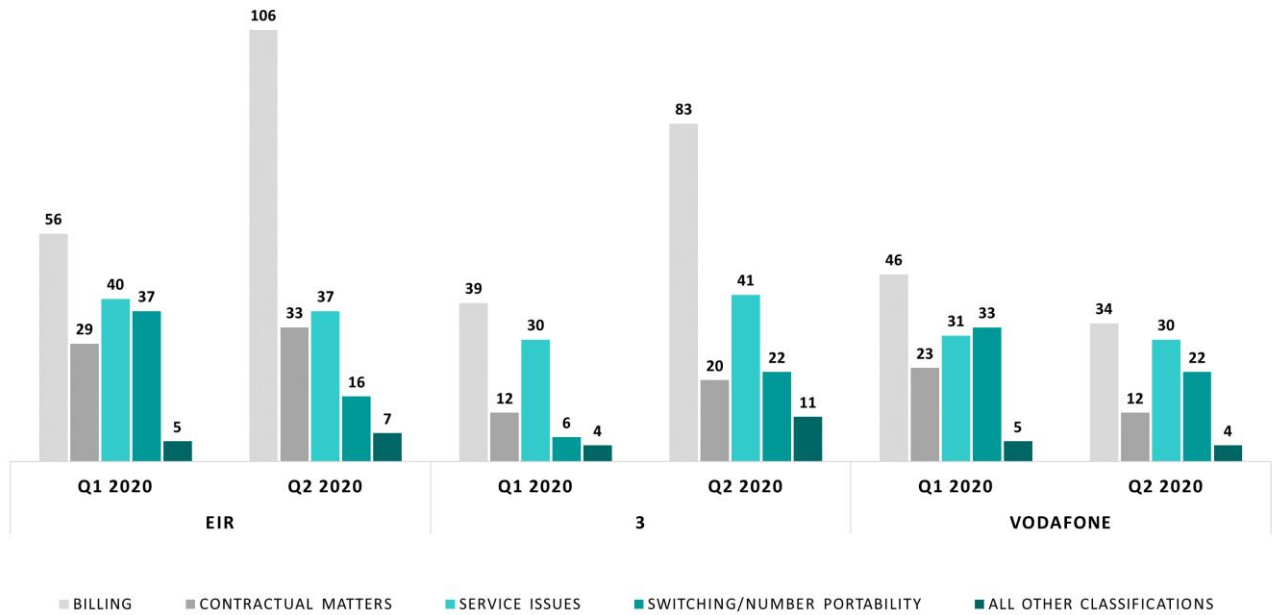


Figure 9: Mobile Service Provider ECS complaints by classification type Q1 2020 vs Q2 2020

### 4.3 Mobile Service Provider ECS Issues Recorded

The below table shows, in descending order, the highest number of issues recorded for each Mobile Service Provider listed in Figure 7, as reported by consumers, comparing Q1 2020 to Q2 2020.

	Number of Issues Q1 2020	Number of Issues Q2 2020
<b>Eir<sup>4</sup></b>		
Billed more than agreed amount	88	151
Loss of service	60	71
Billed after cancellation	54	49
Contract termination issues - cancellation procedures		45
Refund not received	28	44
Service issues - intermittent service		35
Switching/number portability - delay switching	78	34
Mobile coverage	32	32
Contract termination issues - cancellation not accepted		26
Switching/number portability - number loss	35	25
Service availability	45	
Billed for service not received	35	
Terms & conditions - contractual duration	27	
<b>3</b>		
Billed more than agreed amount	63	123
Loss of service	15	42
Service issues - intermittent service	20	39
Switching/number portability - delay switching		35
Refund not received	21	32
Switching/number portability - unlock code issue	22	24
Billed for service not received	20	24
Credit not applied		24
Mobile coverage	30	23
Billed after cancellation		20
Service availability	17	
Misleading sales	16	
Terms & conditions - cancellation penalties	13	

<b>Vodafone</b>		
Billed more than agreed amount	66	55
Switching/number portability - unlock code issue	128	50
Terms & conditions - unlimited/fair usage		47
Loss of service	36	40
Switching/number portability - delay switching	32	27
Mobile coverage	27	27
Equipment issues - handset		24
Refund not received	23	23
Service availability	29	16
Billed for service not requested		15
Billed after cancellation	43	
Billed for service not received	20	
Credit not applied	19	

**Figure 10: Highest number of issues recorded by Mobile Service Provider Q1 2020 vs Q2 2020**

### 4.4 Mobile Service Provider ECS Complaints Closed in Q2 2020

Figure 11 shows the number of ECS complaints closed in Q2 2020, for each Mobile Service Provider<sup>4</sup> listed in Figure 7, broken down by number of working days open (Monday to Friday, and excluding public holidays). Complaints closed within Q2 2020 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

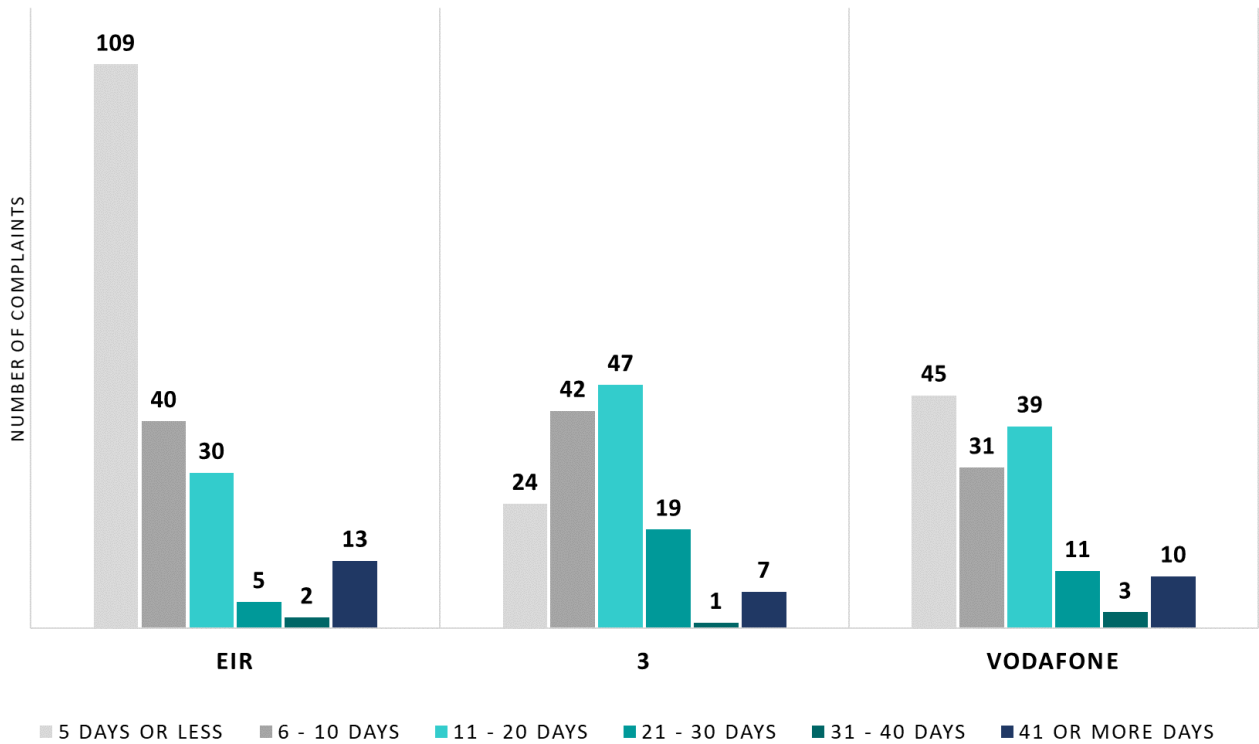
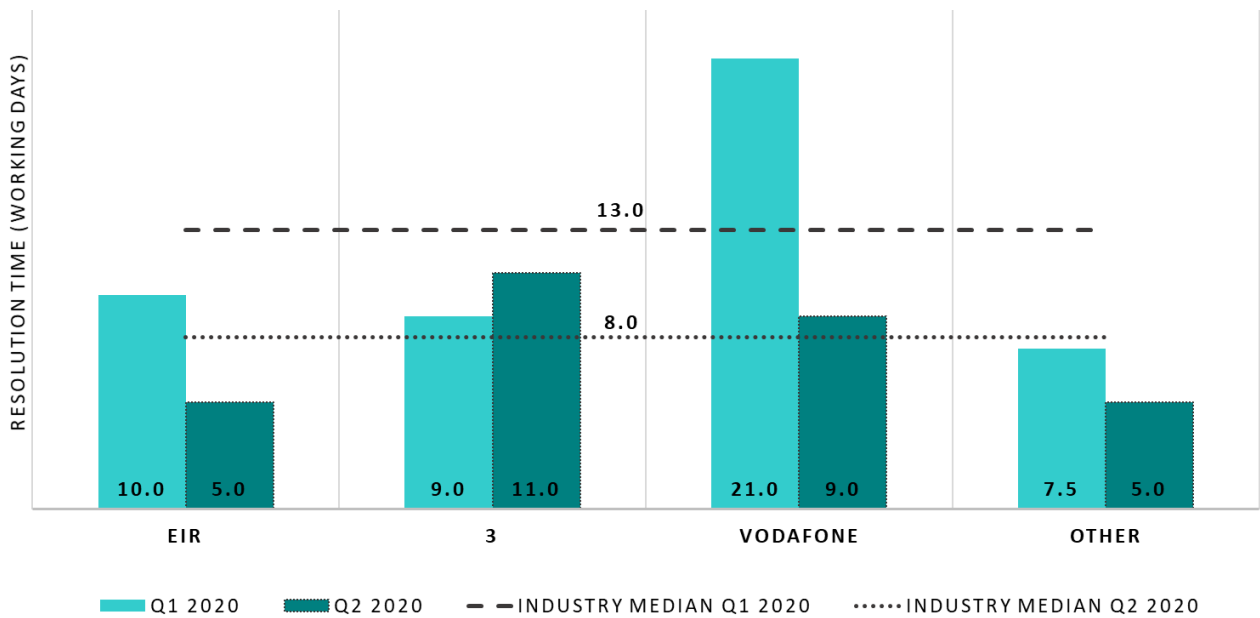


Figure 11: ECS complaints closed in Q2 2020 by Mobile Service Provider and number of working days open

The resolution time is measured in working days, from the date ComReg first escalates the complaint to a Service Provider to the date of complaint closure. Figure 12 shows the median resolution time for ECS complaints in Figure 11, broken down by number of working days open (Monday to Friday, and excluding public holidays), comparing Q1 2020<sup>5</sup> to Q2 2020. Complaints closed within Q2 2020 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 April 2020. The ‘industry median’ is a ‘snapshot’ based on all complaints closed within each quarter for all Mobile Service Providers.

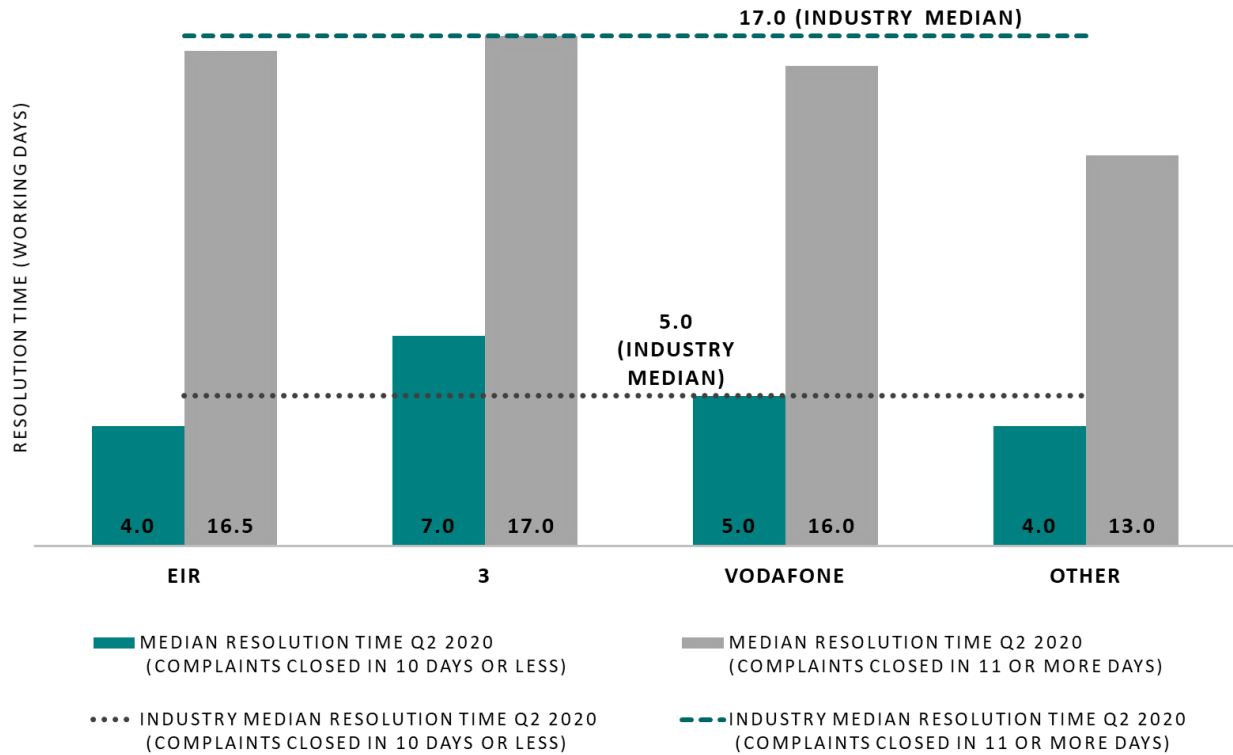


**Figure 12: Median complaint resolution time by Mobile Service Provider Q1 2020 vs Q2 2020**

<sup>5</sup> For details of complaints closed in Q1 2020, see ComReg Consumer Line Statistics Report Q1 2020.



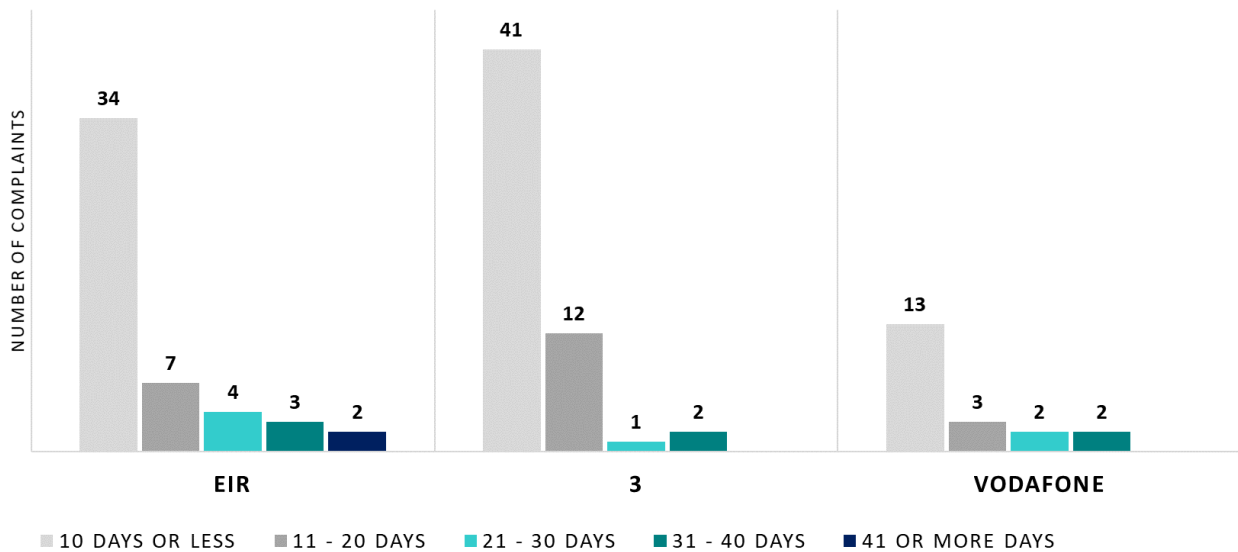
Figure 13 provides a further breakdown of the Q2 2020 complaint resolution time of ECS complaints in Figure 12. In Figure 13, the median resolution time is further broken down by a) complaints closed in 10 days or less, and b) complaints closed within 11 days or more. The 'industry median' is a 'snapshot' based on all complaints closed within the quarter for all Mobile Service Providers.



**Figure 13: Median complaint resolution time by Mobile Service Provider Q2 2020, complaints closed in 10 days or less vs complaints closed in 11 days or more**

## 4.5 Mobile Service Provider ECS Complaints Open at 30 June 2020

Figure 14 shows the number ECS complaints open at 30 June 2020, for each Mobile Service Provider<sup>4</sup> listed in Figure 7, broken down by the number of working days elapsed since they were first escalated to the Service Provider.



**Figure 14: Mobile Service Provider ECS complaints open at 30 June 2020 by number of working days since first escalation**

## 4.6 Mobile Service Provider ECS Complaints per 100,000 Subscribers

Figure 15 below shows the average number of complaints per 100,000 subscribers for each Mobile Service Provider<sup>4</sup> listed in Figure 7 and the total industry average, comparing Q1 2020 to Q2 2020. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Mobile Service Providers.

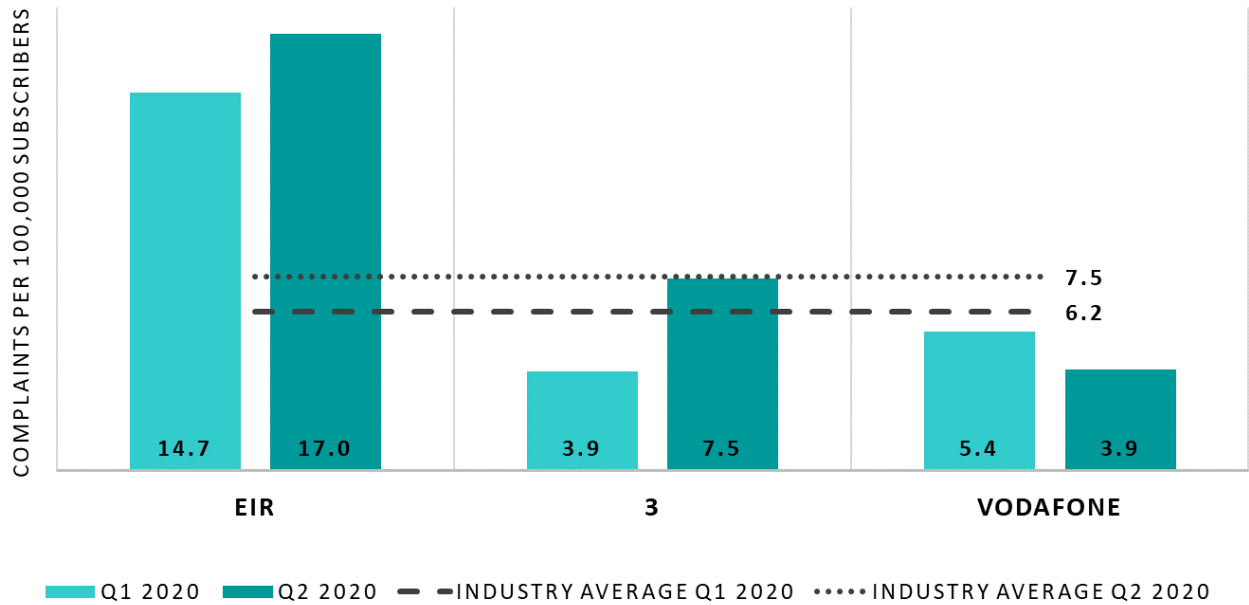


Figure 15: ECS complaints per 100,000 subscribers by Mobile Service Provider Q1 2020 vs Q2 2020

## 4.7 Mobile Service Provider PRS Issues

PRS texts are sent to five-digit short codes beginning with the number 5 (e.g. 57XXX), and texts to PRS typically cost more than ordinary texts, depending on the prefix number or short code. Figure 16 below shows the number of PRS issues raised with ComReg's Consumer Line in Q2 2020 split by short code (where the total number of issues recorded for the short code during the quarter is greater than 40 issues) and further split by Mobile Service Provider (where the total number of issues recorded for the Mobile Service Provider is greater than 40 issues).

Short Code	Mobile Service Provider & Number of Issues Recorded						Total
	Eir <sup>4</sup>	Tesco Mobile Ireland	3	Virgin Media	Vodafone	Other	
57977	385	72	371	26	481	159	1,494
57976	307	68	238	15	279	103	1,010
57721	157	1	38	0	2	23	221
57710	69	1	26	0	6	5	107
Other	490	69	395	19	325	386	1,684
<b>Total</b>	<b>1,408</b>	<b>211</b>	<b>1,068</b>	<b>60</b>	<b>1,093</b>	<b>676</b>	<b>4,516</b>

Figure 16: Number of PRS issues recorded by PRS short code and ECS Provider Q2 2020

Figure 17 shows the average number of PRS issues recorded (rounded to the nearest whole number) per 100,000 subscribers for each Mobile Service Provider<sup>4</sup> listed in Figure 16 and the total industry average, comparing Q1 2020 to Q2 2020. The ‘industry average’ is based on all PRS issues recorded for all Mobile Service Providers within each quarter.

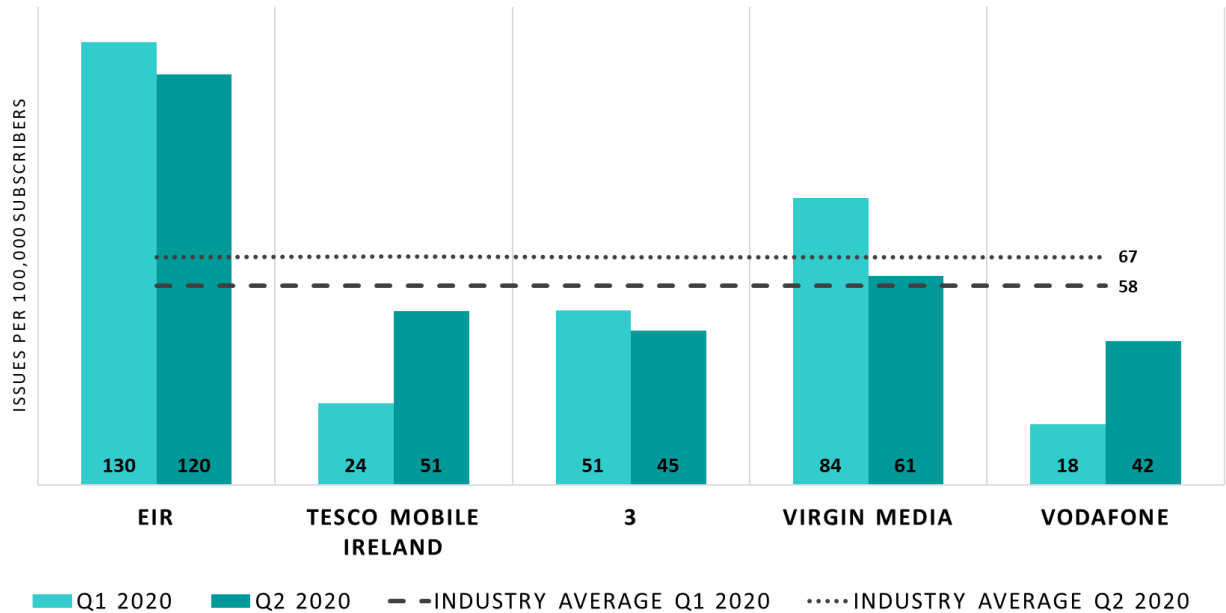


Figure 17: PRS issues by ECS Provider per 100,000 subscribers Q1 2020 vs Q2 2020

# 5: Fixed Service Provider Statistics

## 5.1 Fixed Service Provider ECS Queries vs Complaints

Figure 18 shows the number of ECS queries and complaints recorded for Eir, Sky Ireland Limited, Virgin Media and Vodafone, comparing Q1 2020 to Q2 2020.

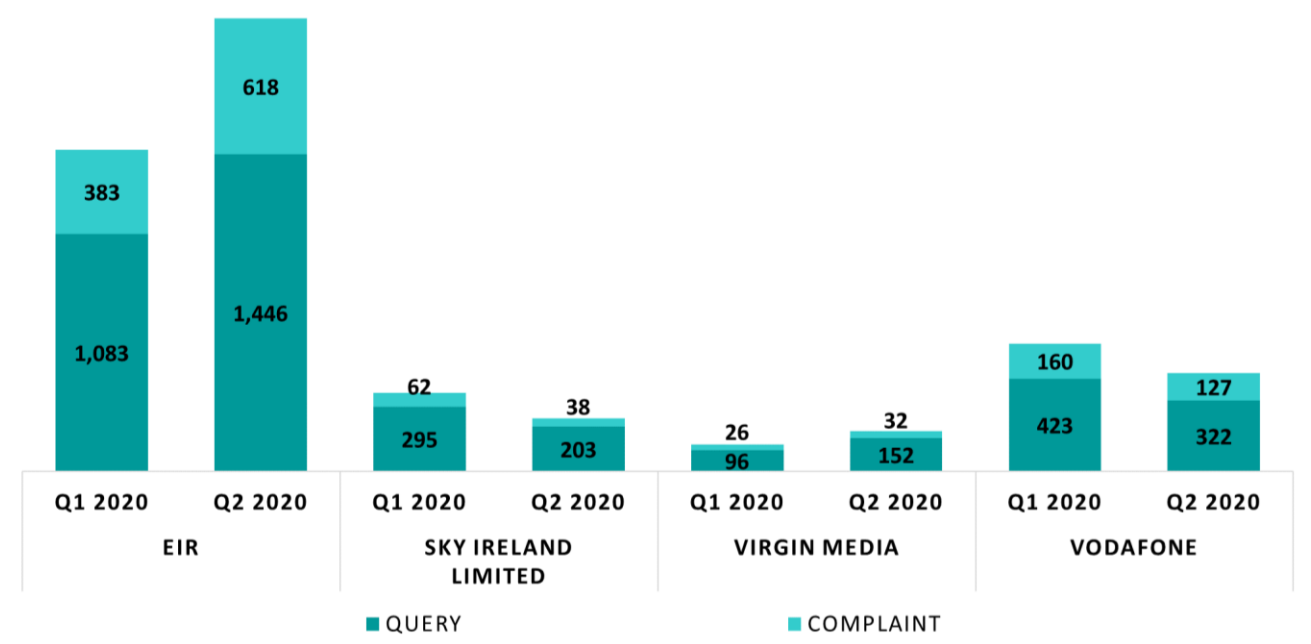


Figure 18: Number of ECS issues queries and complaints by Fixed Service Provider Q1 2020 vs Q2 2020

Figure 19 shows the split of queries to complaints recorded for Eir, Sky Ireland Limited, Virgin Media and Vodafone, including the total industry average comparing Q1 2020 to Q2 2020. The 'industry average' is based on all issues recorded within each quarter for all Fixed Service Providers.

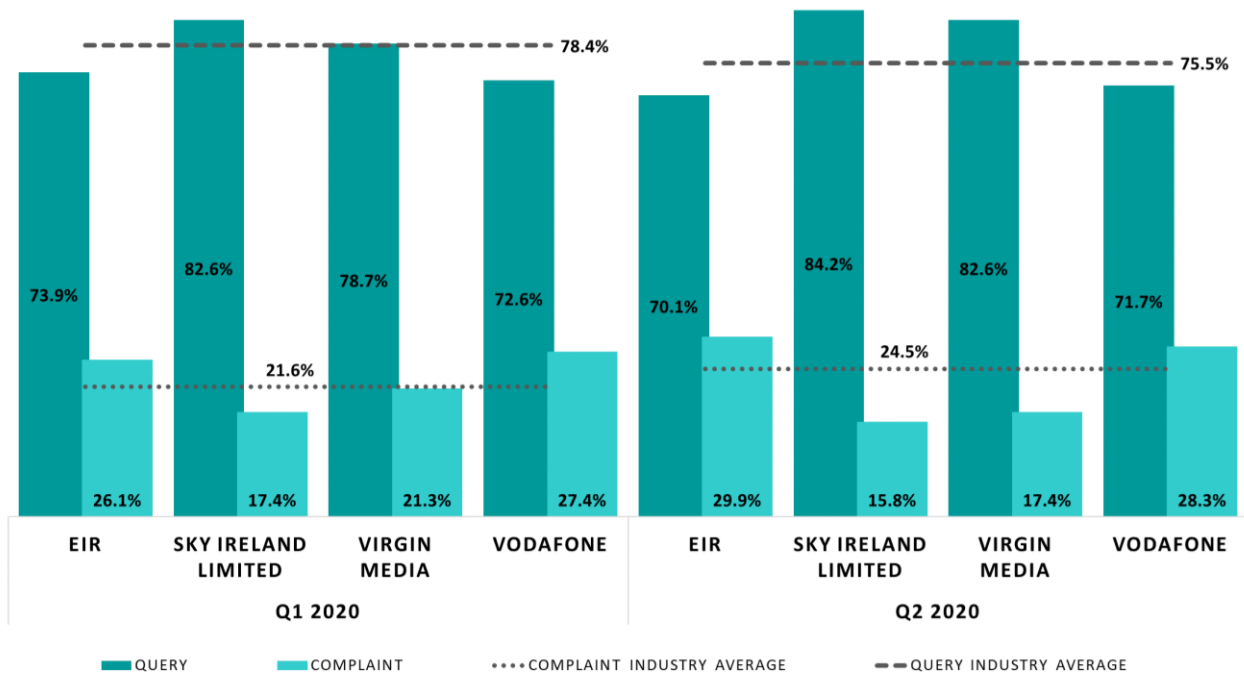


Figure 19: Split of ECS queries and complaints by Fixed Service Provider Q1 2020 vs Q2 2020

## 5.2 Fixed Service Provider ECS Complaints by Classification Type

Figure 20 shows ECS complaints by classification type for each Fixed Service Provider listed in Figure 18, comparing Q1 2020 with Q2 2020. For details of the highest number of issues recorded for each Fixed Service Provider, see Figure 21.

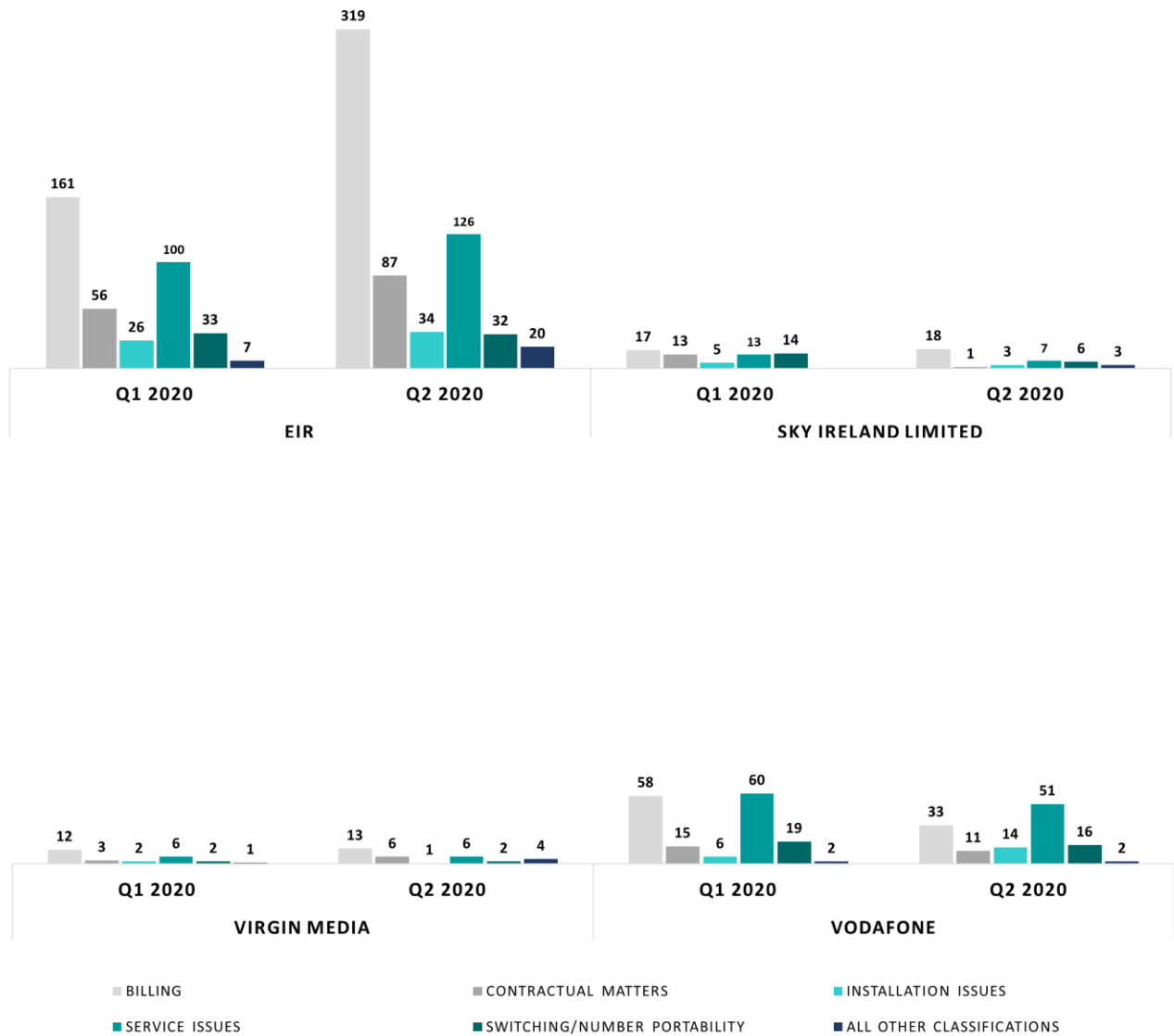


Figure 20: Fixed Service Provider ECS complaints by classification type Q1 2020 vs Q2 2020



### 5.3 Fixed Service Provider ECS Issues Recorded

The below table shows, in descending order, the highest number of ECS issues recorded for each Fixed Service Provider listed in Figure 18, as reported by consumers, comparing Q1 2020 to Q2 2020.

	Number of Issues Q1 2020	Number of Issues Q2 2020
<b>Eir</b>		
Billed more than agreed amount	176	369
Billed after cancellation	189	269
Loss of service	140	210
Contract termination issues - cancellation procedures	53	154
Service availability	112	101
Service issues - intermittent service		90
Delay in installation	92	89
Service issues - e-mail	101	74
Contract termination issues - cancellation not accepted	51	69
Accessing complaints process - issue lodging formal complaint		50
Refund not received	58	
Misleading sales	42	
<b>Sky Ireland Limited</b>		
Loss of service	50	34
Billed after cancellation	41	32
Billed more than agreed amount	29	31
Service issues - intermittent service	29	21
Switching/number portability - delay switching		12
Net neutrality - broadband speeds received		11
Contract termination issues - cancellation procedures	31	10
Delay in installation	13	9
Service availability	13	9
Switching/number portability - UAN/CRN issue	19	8
Contract termination issues - cancellation not accepted	16	
Billed for service not received	11	

<b>Virgin Media</b>		
Billed more than agreed amount	24	30
Billed after cancellation	5	15
Contract termination issues - cancellation procedures	12	14
Service issues - intermittent service	4	12
Contract termination issues - cancellation not accepted		9
Refund not received		8
Terms & conditions - contractual duration		7
Switching/number portability - number loss		7
Billed for service not received		7
Loss of service	9	6
Terms & conditions - cancellation penalties	6	
Billed for failed payment charge	5	
Misleading sales	4	
Contract change notification - contract change notification not received	4	
Bill not received	3	
<b>Vodafone</b>		
Loss of service	97	84
Service issues - intermittent service	46	46
Billed after cancellation	68	31
Billed more than agreed amount	51	31
Switching/number portability - number loss	18	27
Delay in installation	24	24
Net neutrality - broadband speeds received		20
Service availability	43	19
Refund not received		16
Switching/number portability - delay switching		12
Contract termination issues - cancellation procedures	19	
Billed for service not received	19	
Switching/number portability - UAN/CRN issue	19	

**Figure 21: Highest number of issues recorded by Fixed Service Provider Q1 2020 vs Q2 2020**

## 5.4 Fixed Service Provider ECS Complaints Closed in Q2 2020

Figure 22 below shows ECS complaints closed in Q2 2020, for each Fixed Service Provider listed in Figure 18, broken down by number of working days. Complaints closed within Q2 2020 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

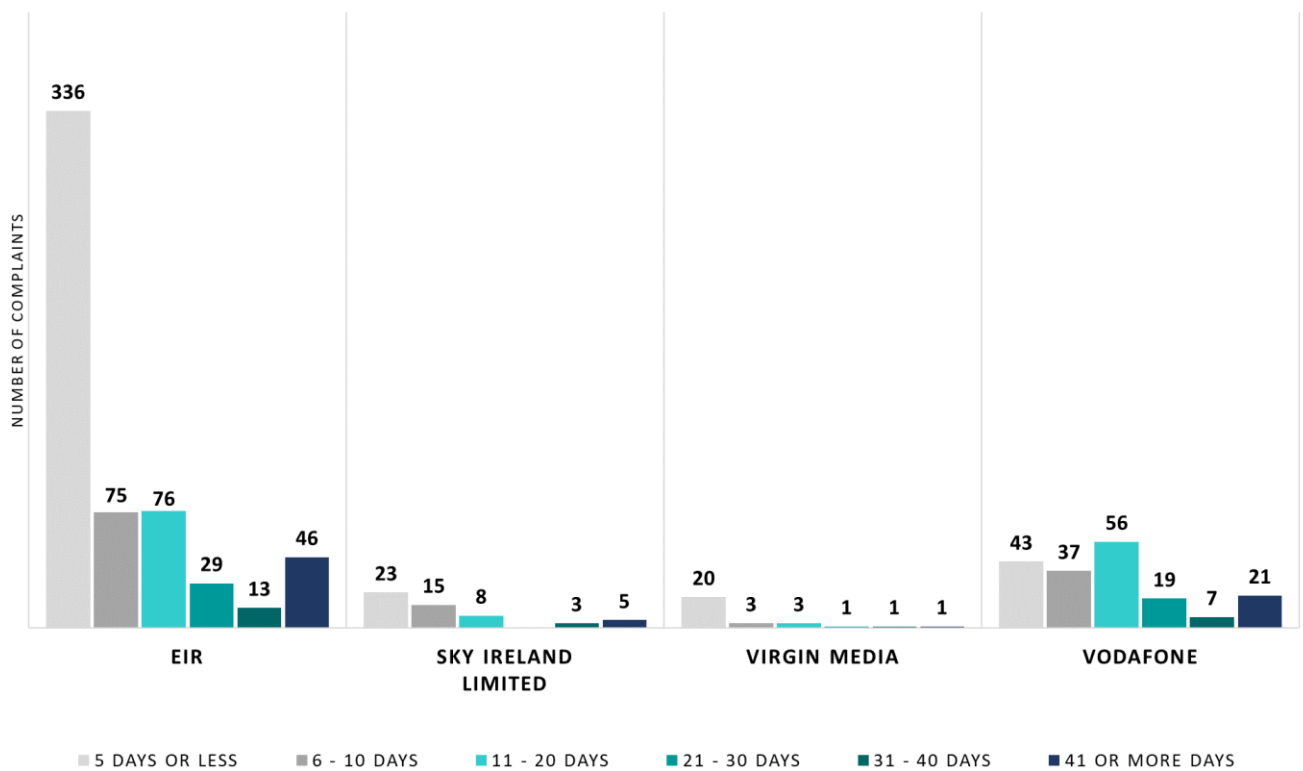
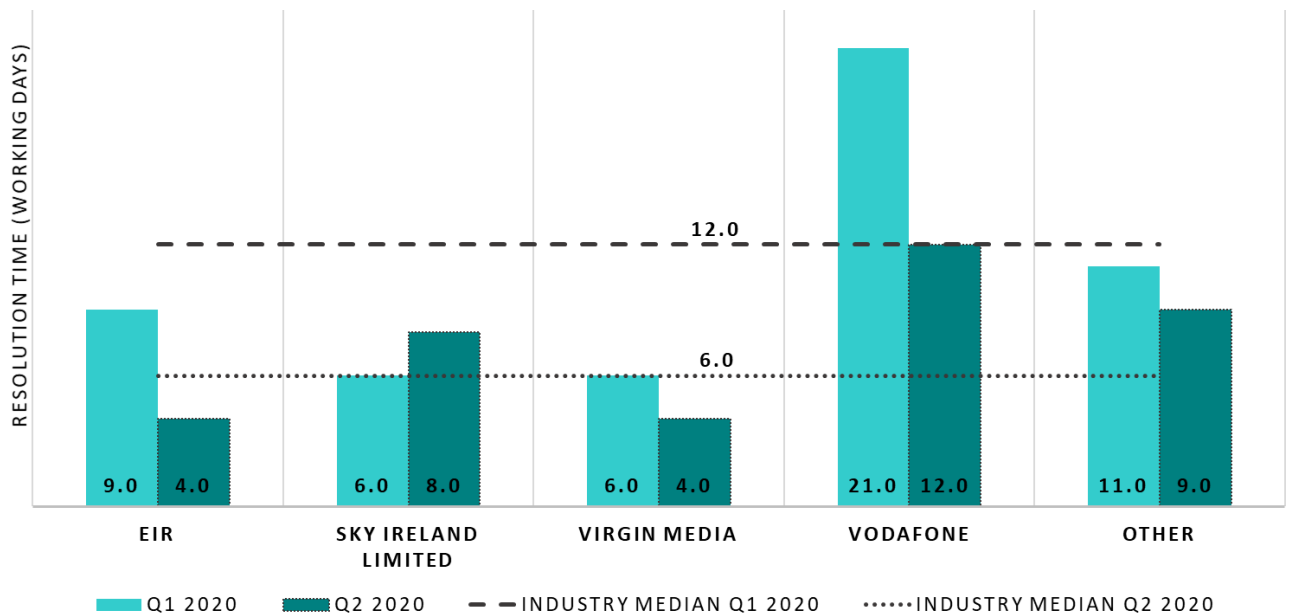


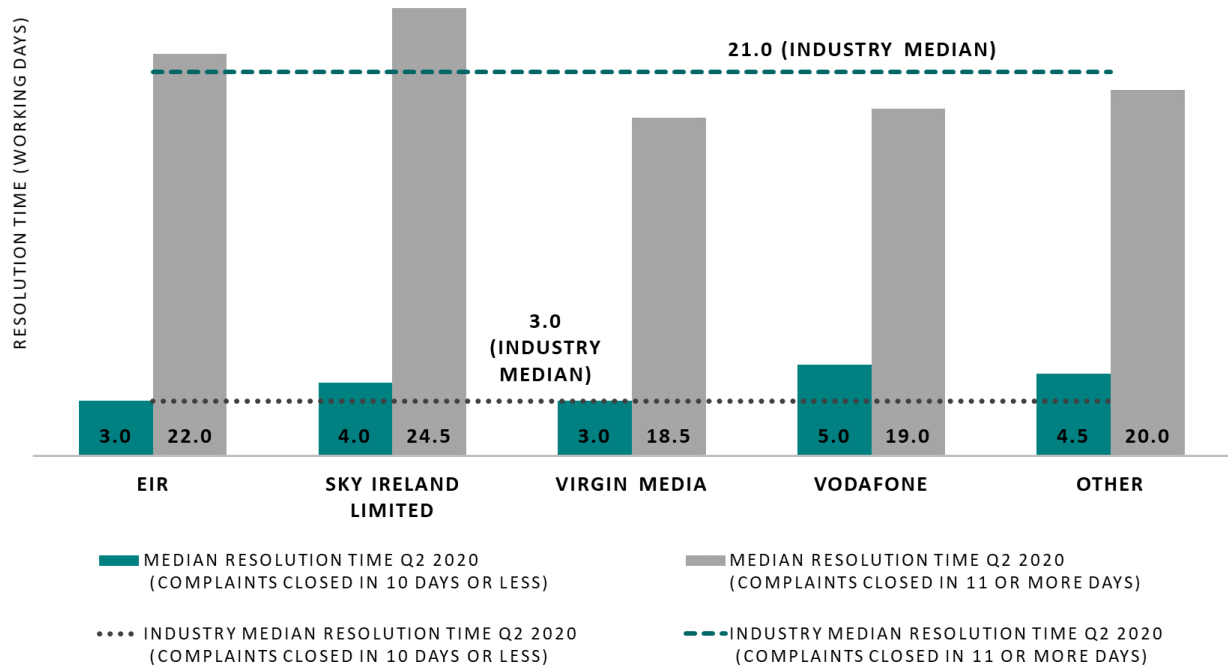
Figure 22: Fixed Service Provider ECS complaints closed in Q2 2020 by number of working days open

The resolution time is measured in working days, from the date ComReg first escalates the complaint to a Service Provider to the date of complaint closure. Figure 23 shows the median resolution time for ECS complaints in Figure 22, broken down by number of working days open (Monday to Friday, and excluding public holidays), comparing Q1 2020<sup>5</sup> to Q2 2020. Complaints closed within Q2 2020 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 April 2020. The ‘industry median’ is a ‘snapshot’ based on all complaints closed within each quarter for all Fixed Service Providers.



**Figure 23: Median complaint resolution time by Fixed Service Provider Q1 2020 vs Q2 2020**

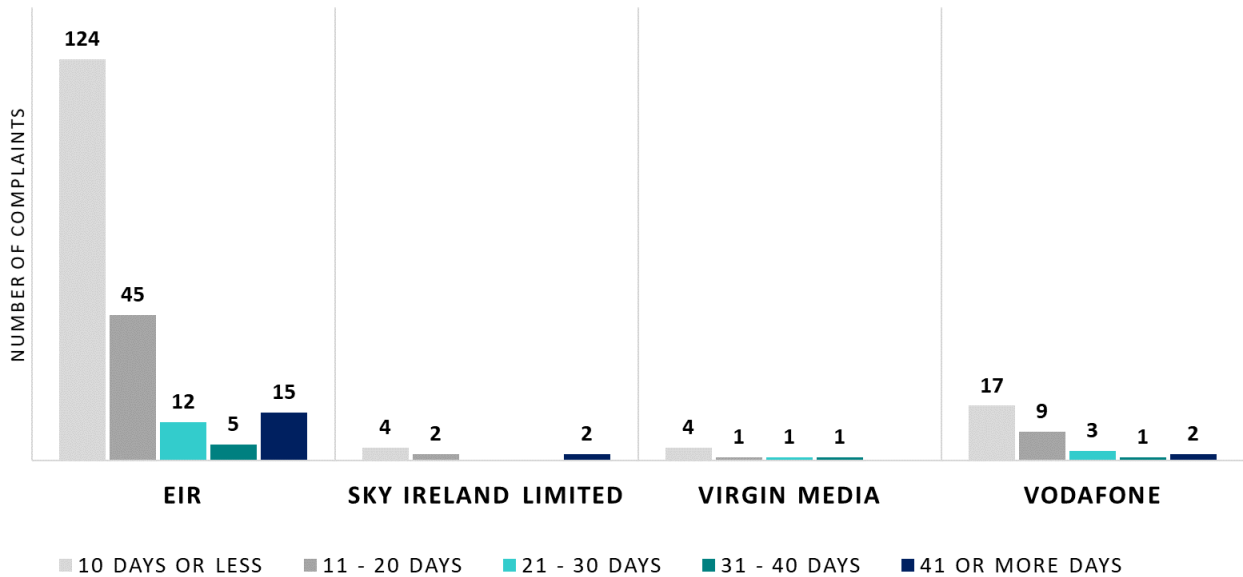
Figure 24 provides a further breakdown of the Q2 2020 complaint resolution time of ECS complaints in Figure 23. In Figure 24, the median resolution time is further broken down by a) complaints closed in 10 days or less, and b) complaints closed within 11 days or more. The 'industry median' is a 'snapshot' based on all complaints closed within the quarter for all Fixed Service Providers.



**Figure 24: Median complaint resolution time by Fixed Service Provider Q2 2020, complaints closed in 10 days or less versus complaints closed in 11 days or more**

## 5.5 Fixed Service Provider ECS Complaints Open at 30 June 2020

Figure 25 shows the number of ECS complaints open at 30 June 2020, for each Fixed Service Provider listed in Figure 18, broken down by number of working days elapsed since they were first escalated to the Service Provider.



**Figure 25: Fixed Service Provider ECS complaints open at 30 June 2020 by number of working days since first escalation**

## 5.6 Fixed Service Provider ECS Complaints per 100,000 Subscribers

Figure 26 below shows the average complaint rate per 100,000 subscribers for each Fixed Service Provider listed in Figure 18 and the total industry average, comparing Q1 2020 to Q2 2020. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Fixed Service Providers.

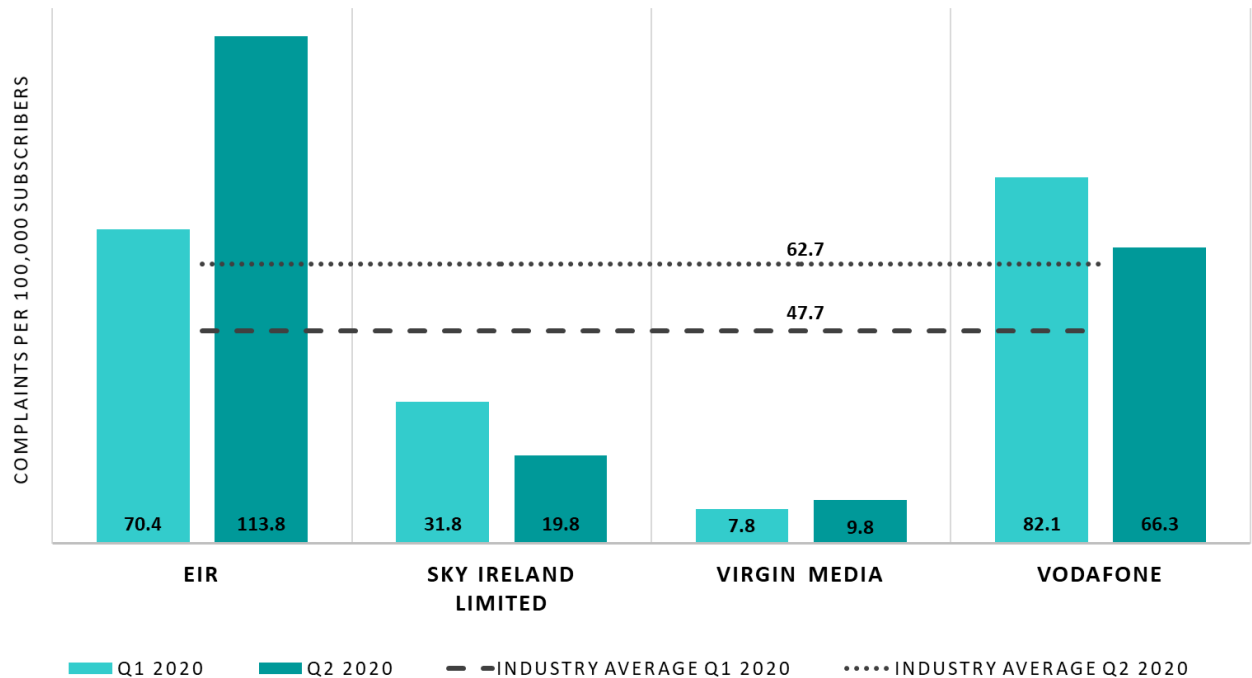


Figure 26: ECS complaints by Fixed Service Provider per 100,000 subscribers Q1 2020 vs Q2 2020

# Annex 1: ComReg Consumer Line Contact Details



\*The message will be charged at the standard text rate. If you have any problems with the service, please let us know at 01 804 9668.

\*\*Please outline the issue you need assistance with and we will respond to you by text. Please use keyword *ASKCOMREG* in all text messages, including replies.



# Annex 2: Mobile Coverage Statistics

Figure 27 below shows the number of mobile coverage issues versus all other service issues (as reported by consumers) for each Mobile Service Provider<sup>4</sup> listed in Figure 7, comparing Q1 2020 to Q2 2020.

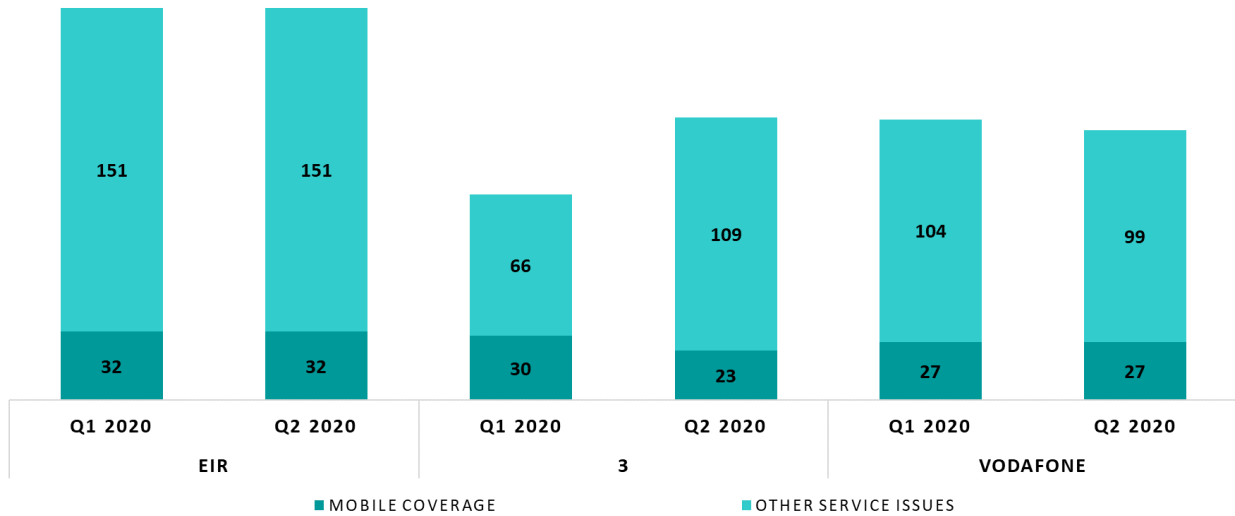
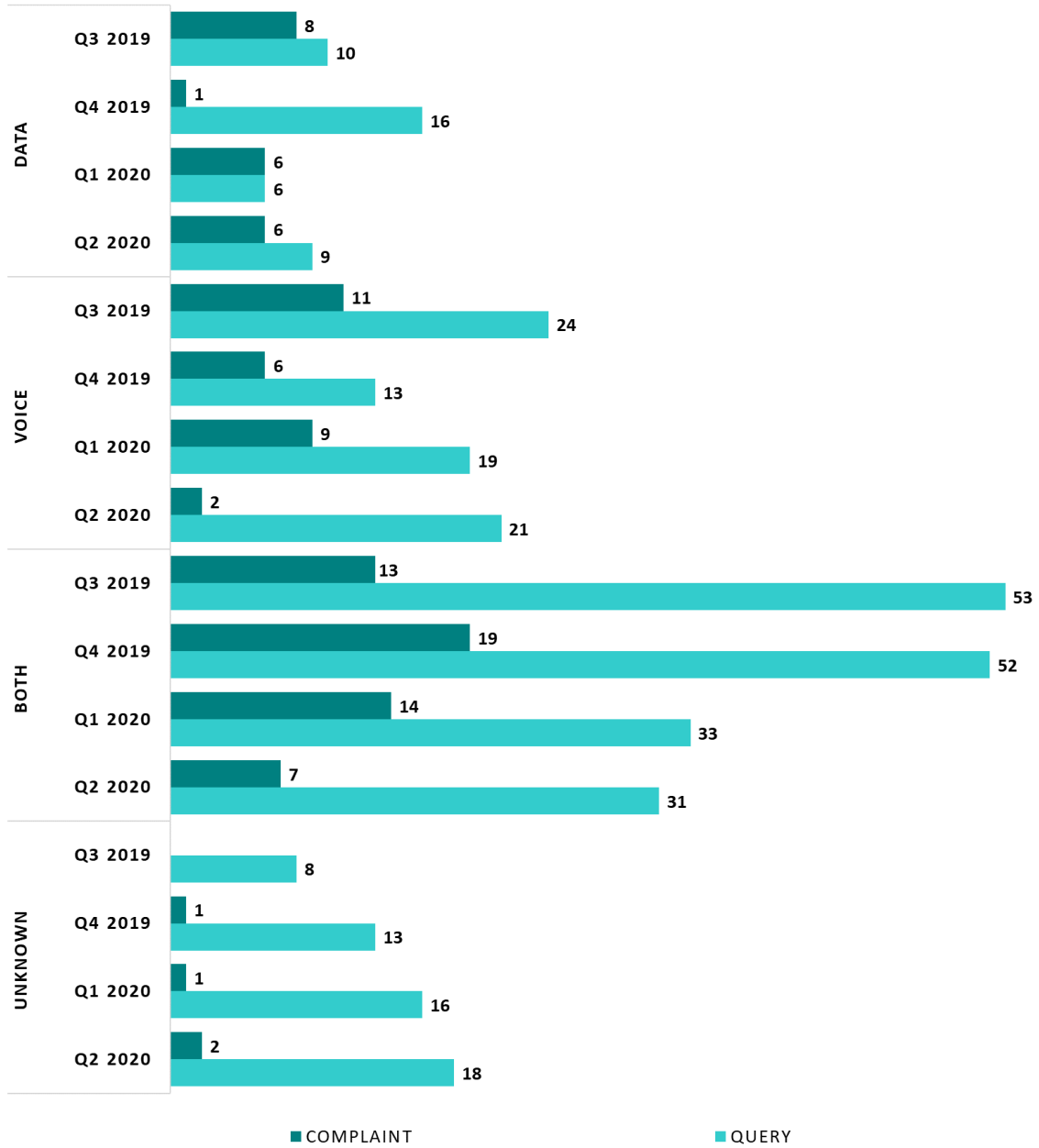


Figure 27: Number of ECS service issues by Mobile Service Provider Q1 2020 vs Q2 2020



\*Unknown refers to contacts from consumers (by email) where relevant information pertaining to type or frequency has not been provided

**Figure 28: Mobile Coverage Issues by Type Q3 2019 – Q2 2020**

Figure 29 shows the average number of mobile coverage issues recorded per 100,000 subscribers for each Mobile Service Provider<sup>6</sup> listed in Figure 7. The ‘industry average’ is based on mobile coverage issues recorded for all Mobile Service Providers within each quarter.

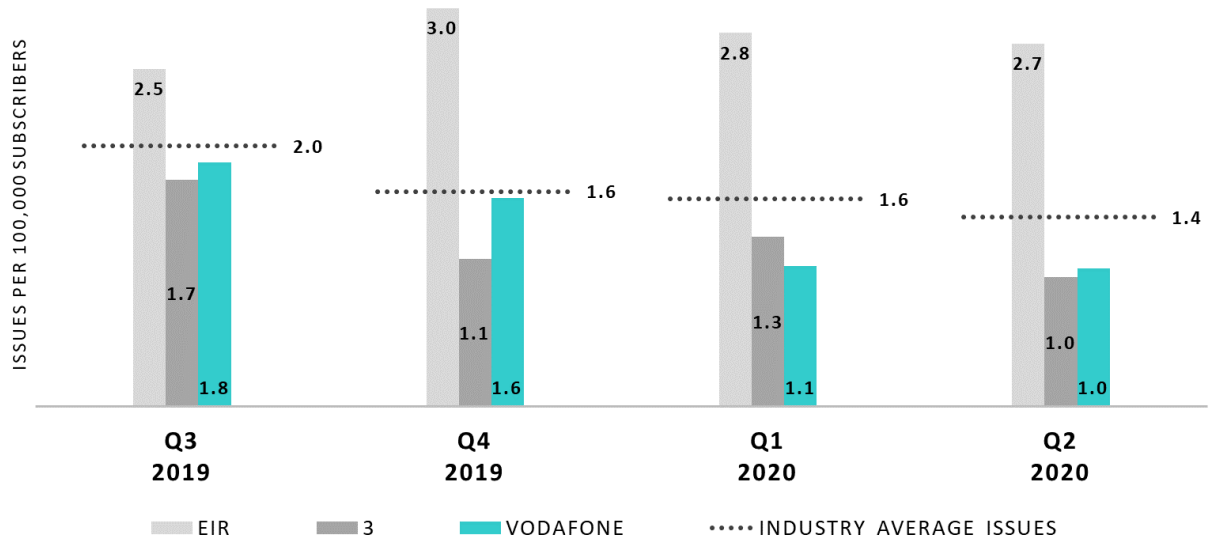


Figure 29: Mobile Coverage issues (per 100,000 Subscribers) Q3 2019 – Q2 2020

<sup>6</sup> On this chart, issues recorded for GoMo are included in Eir’s figures for Q1 2020 and Q2 2020.

## Annex 3: Classification Type Index

This Classification Type Index reflects the classification and sub-classification types<sup>7</sup> relevant to highest volume issues recorded in Q2 2020<sup>8</sup>.

<p><b>Billing includes:</b></p> <ul style="list-style-type: none"> <li>Billed after cancellation</li> <li>Billed for service not received</li> <li>Billed for service not requested</li> <li>Billed more than agreed amount</li> <li>Credit not applied</li> <li>Refund not received</li> </ul>
<p><b>Contractual Matters includes:</b></p> <ul style="list-style-type: none"> <li>Contract termination issues - cancellation not accepted</li> <li>Contract termination issues - cancellation procedures</li> <li>Terms &amp; conditions - contractual duration</li> <li>Terms &amp; conditions - unlimited/fair usage</li> </ul>
<p><b>Customer Service includes:</b></p> <ul style="list-style-type: none"> <li>Accessing complaints process - issue lodging formal complaint</li> </ul>
<p><b>Installation Issues includes:</b></p> <ul style="list-style-type: none"> <li>Delay in installation</li> </ul>
<p><b>Other ECS includes:</b></p> <ul style="list-style-type: none"> <li>Net neutrality - broadband speeds received</li> </ul>
<p><b>Service Issues includes:</b></p> <ul style="list-style-type: none"> <li>Equipment issues - handset</li> <li>Loss of service</li> <li>Mobile coverage</li> <li>Service availability</li> <li>Service issues - e-mail</li> <li>Service issues - intermittent service</li> </ul>
<p><b>Switching/Number Portability Issues includes:</b></p> <ul style="list-style-type: none"> <li>Delay switching</li> <li>Number loss</li> <li>UAN/CRN issue</li> <li>Unlock code issue</li> </ul>

<sup>7</sup> Sub-classification types may vary each quarter based on the nature of issues reported by consumers.

<sup>8</sup> For detail on classification and sub-classification types relevant to highest volume issues recorded in Q1 2020, see ComReg Consumer Line Statistics Report Q1 2020.

## Legal Disclaimer

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