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Rialáil Cumarsáide
Commission for
Communications Regulation

ComReg Consumer Line Statistics Report

Q3 2021 – 1 July to 30 September 2021

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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 Q3 2021¹.

In Q3 2021, ComReg's Consumer Care team recorded approximately 12,200 contacts and 4,600 issues. In Q2 2021, 4,390 issues were recorded, and approximately 11,700 consumer contacts were received. ComReg's Consumer Care team managed approximately 2,600 Service Provider contacts during Q3 2021, compared to 3,400 in Q2 2021. 86% of all issues recorded were queries and 14% of all issues were complaints. 78% of all issues recorded relate to ECS, 10% relate to PRS, and 12% relate to 'Not for ComReg'/Other. There was a 52% decrease in the total number of issues recorded compared to Q3 2020; ECS issues decreased by 49%, and PRS issues decreased by 75%.

In Q3 2021, ComReg's Consumer Care team recorded 308 Mobile Service Provider issues for Eir. 233 issues were recorded for 3. 315 issues were recorded for Vodafone. The median resolution time for Mobile Service Provider complaints was 7.0 working days, compared to 9.0 working days in Q2 2021. The average number of complaints per 100,000 subscribers was 2.8, compared to an average of 3.0 complaints per 100,000 subscribers in Q2 2021.

In Q3 2021, ComReg's Consumer Care team recorded 928 Fixed Service Provider issues for Eir. 219 issues were recorded for Sky Ireland Limited. 292 issues were recorded for Virgin Media. 428 issues were recorded for Vodafone. The median resolution time for Fixed Service Provider complaints was 6.0 working days, compared to 8.0 working days in Q2 2021. The average number of complaints per 100,000 subscribers was 31.8, compared to an average of 33.5 complaints per 100,000 subscribers in Q2 2021.

¹ 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 Line Overview

2.1 Consumer Line Contacts

In Q3 2021, approximately 12,200 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 channel² over the last four quarters. In Q3 2021, phone and e-mail/online form continued to be the most popular methods of contact. ComReg’s Consumer Line received approximately 2,600 service provider contacts in Q3 2021.

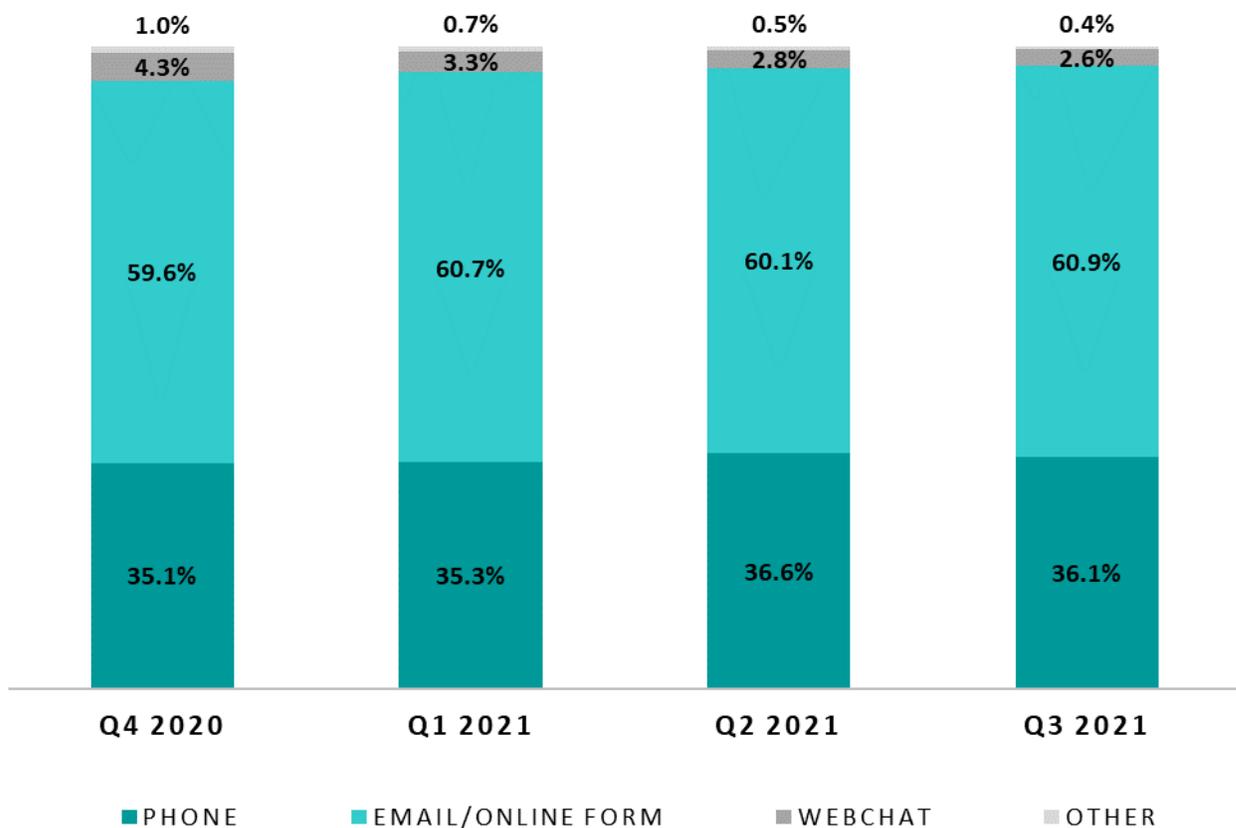


Figure 1: Split of contacts to ComReg’s Consumer Line by channel Q4 2020 – Q3 2021

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

2.2 Consumer Line Survey

Consumers who contact ComReg’s Consumer Line via phone are presented with the option to provide feedback through a phone or e-mail survey. The survey consists of four questions, three of which pertain to the consumer’s experience with ComReg (for queries and complaints), and one of which pertains to the consumer’s experience with their operator (for complaints only). Consumers are asked to rank their responses using a scale of 1 to 5³.

In Q3 2021, consumers completed 709 phone surveys in relation to queries, 570 phone surveys in relation to complaints, and 89 e-mail surveys in relation to complaints. Figure 2 below outlines the questions contained in the survey and the average ratings received in Q3 2021.

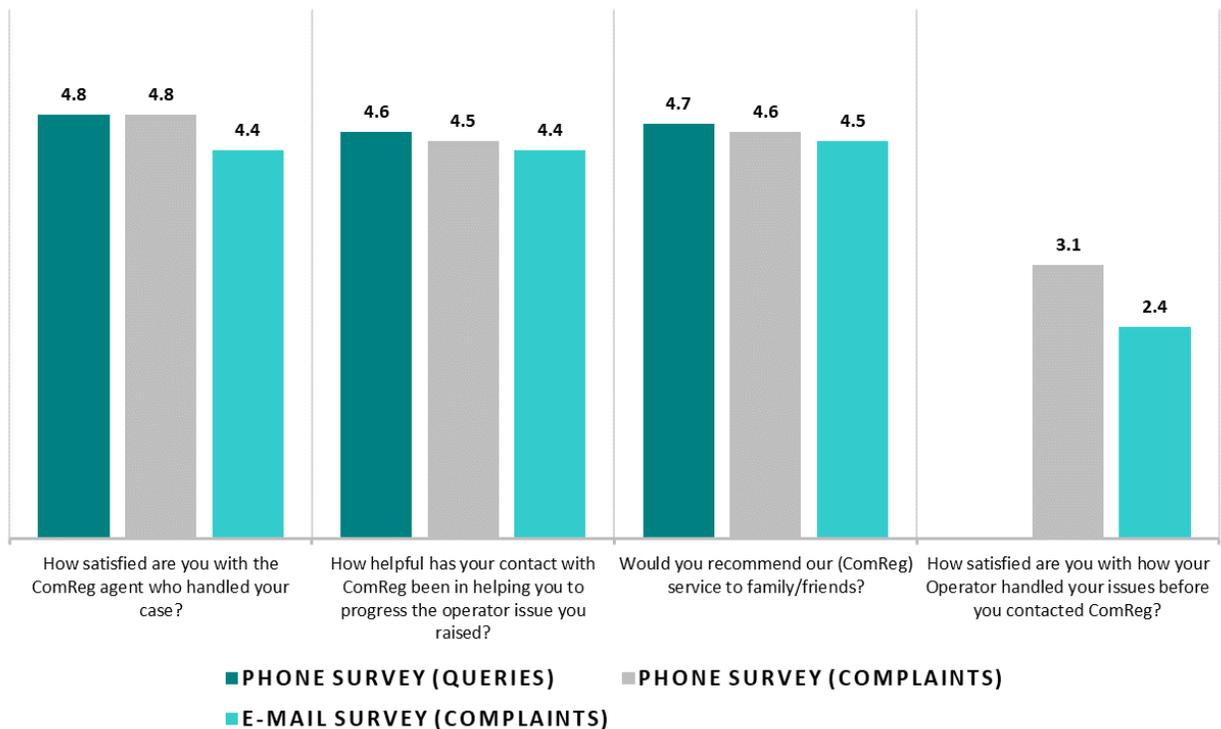


Figure 2: Consumer Line Survey ratings Q3 2021

³ Consumers respond to the questions outlined in Figure 2 by pressing 1 – 5 on their telephone keypad (for telephone surveys), or by selecting a rating of 1 – 5 through a weblink (for e-mail surveys). 1 is the lowest option available to choose, thus expressing dissatisfaction, and 5 is the highest option, expressing satisfaction.

3: Consumer Issues Recorded

3.1 All Issues Recorded

In Q3 2021, ComReg recorded 4,600 issues which are classified across three main categories: ECS, PRS and ‘Not for ComReg/Other’. There was a 52% decrease in the total number of issues recorded compared to Q3 2020; ECS issues decreased by 49%, and PRS issues decreased by 75%. Figure 3 shows the trend in number of issues recorded over the last five quarters, which allows for a seasonal comparison of issues recorded in Q3 2020 to Q3 2021.

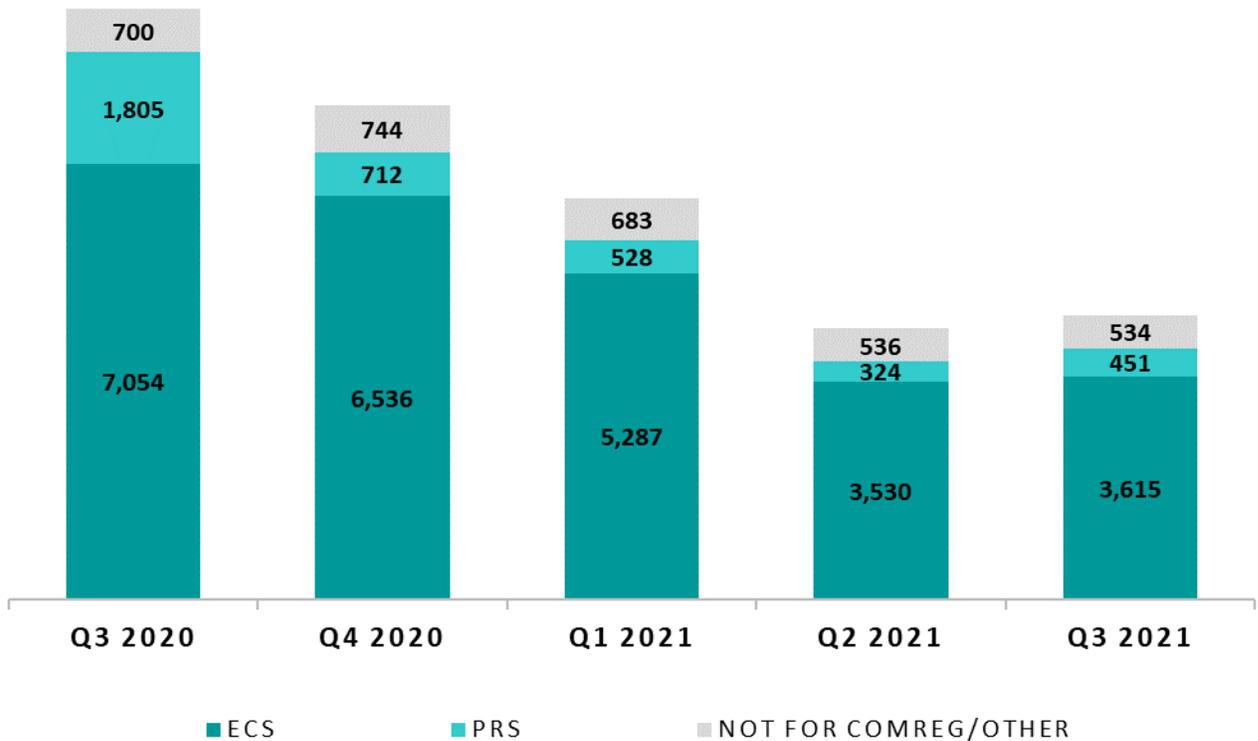


Figure 3: Number of issues recorded Q3 2020 – Q3 2021 by category

In Q3 2021, 78% of all issues recorded were in relation to ECS, while PRS issues and 'Not for ComReg/Other' issues accounted for 10% and 12% of all other issues, respectively. Figure 4 below shows the split of these three category types.

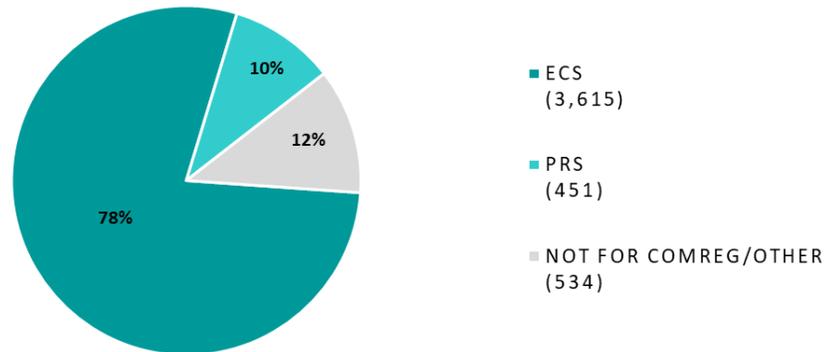


Figure 4: Split of all issues recorded in Q3 2021 by category

3.2 All Issues Recorded by Classification Type⁴

In Q3 2021, a total of 4,600 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 5 below shows the number of issues recorded for each classification type, comparing Q2 2021 to Q3 2021.

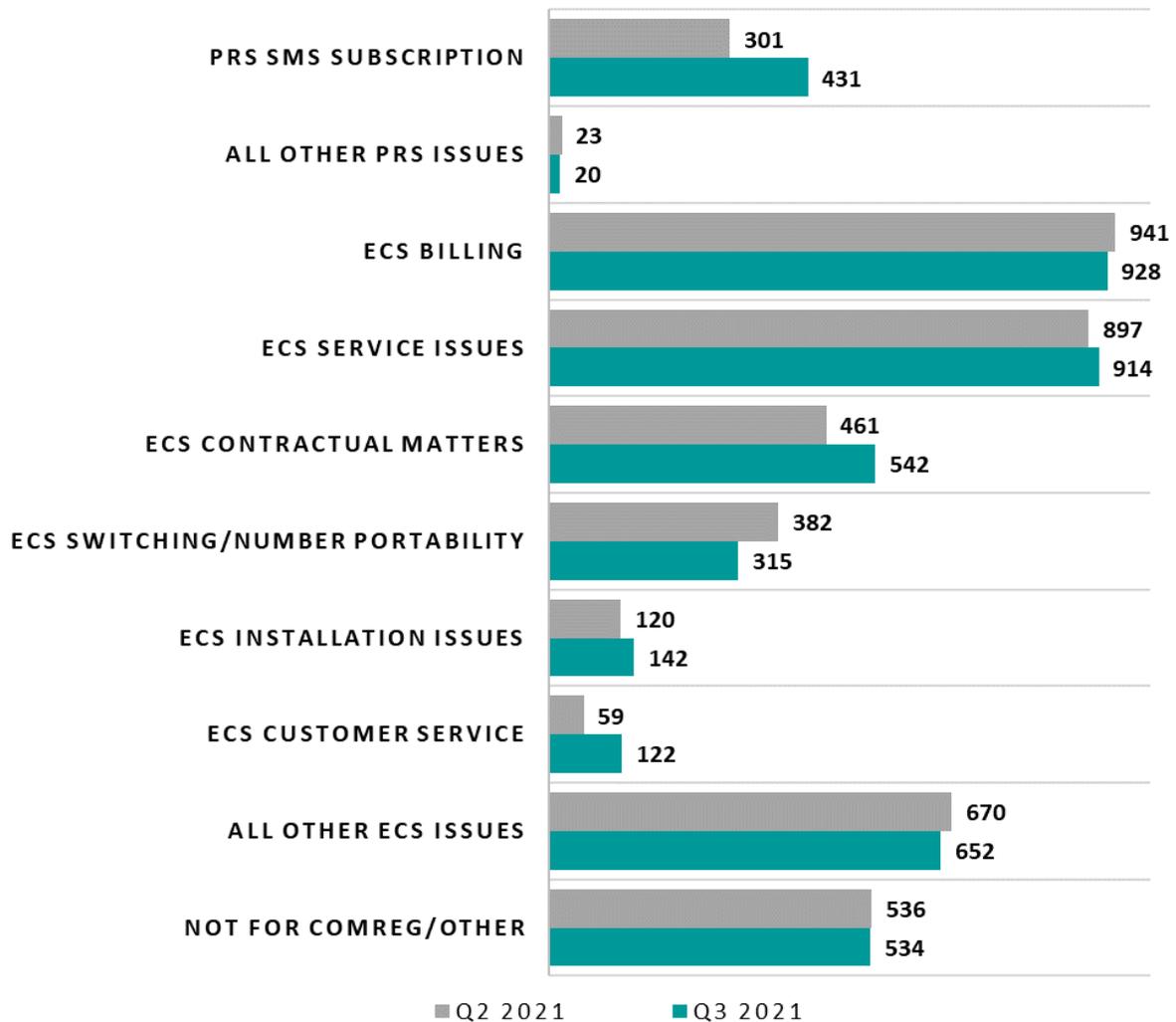


Figure 5: Number of issues recorded by classification type Q2 2021 vs Q3 2021

⁴ 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 Q3 2021, 86% of all issues recorded were queries, and 14% were complaints. Of the 3,941 queries recorded in Q3 2021, 78% were in relation to ECS and 8% were in relation to PRS. Of the 659 complaints recorded, 95% were in relation to ECS and 5% were in relation to PRS. For further detail on the highest volume ECS issues recorded, see Figure 11 and Figure 22.

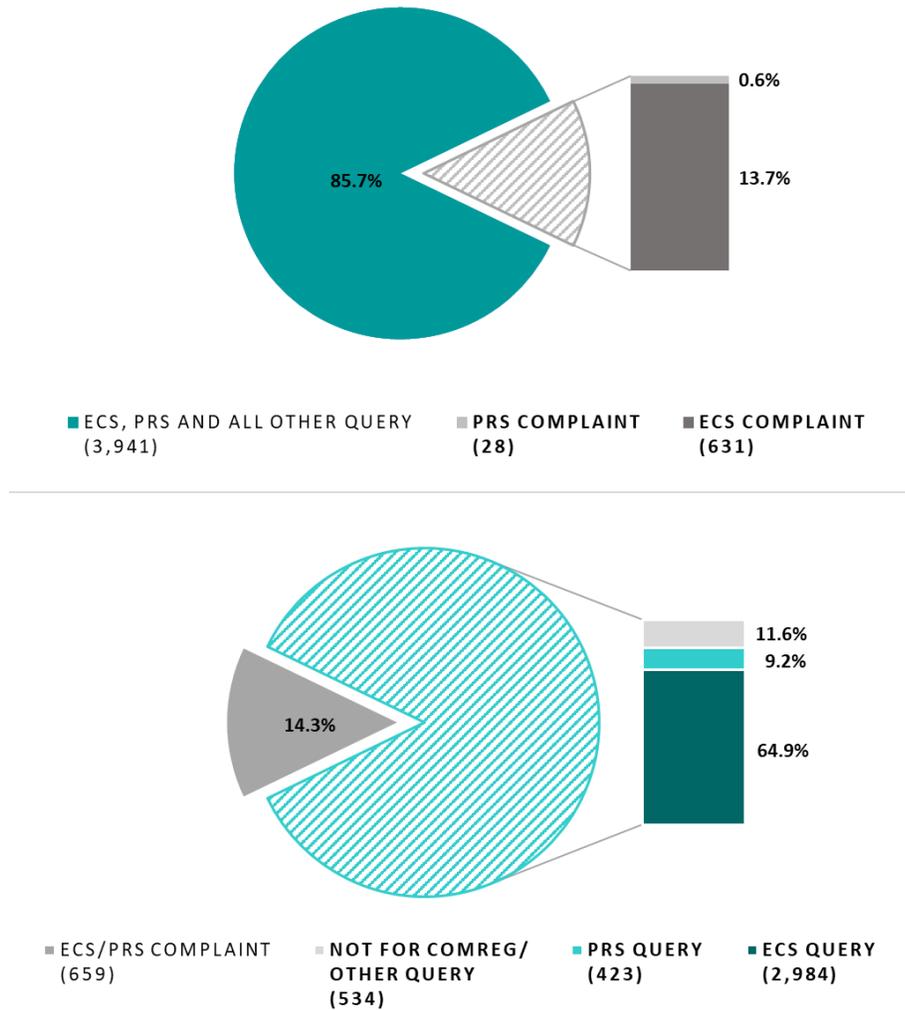


Figure 6: Split of issues recorded by issue type and category Q3 2021

Figure 7 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 Q3 2020 to Q3 2021. From Q3 2020 to Q3 2021, ECS queries decreased by 41% and PRS queries decreased by 72%; ECS complaints decreased by 69% and PRS complaints decreased by 90%. See Figure 16 for detail on PRS issues by ECS Provider and short code. See Figure 10 and Figure 21 for a breakdown of ECS complaints by classification type.

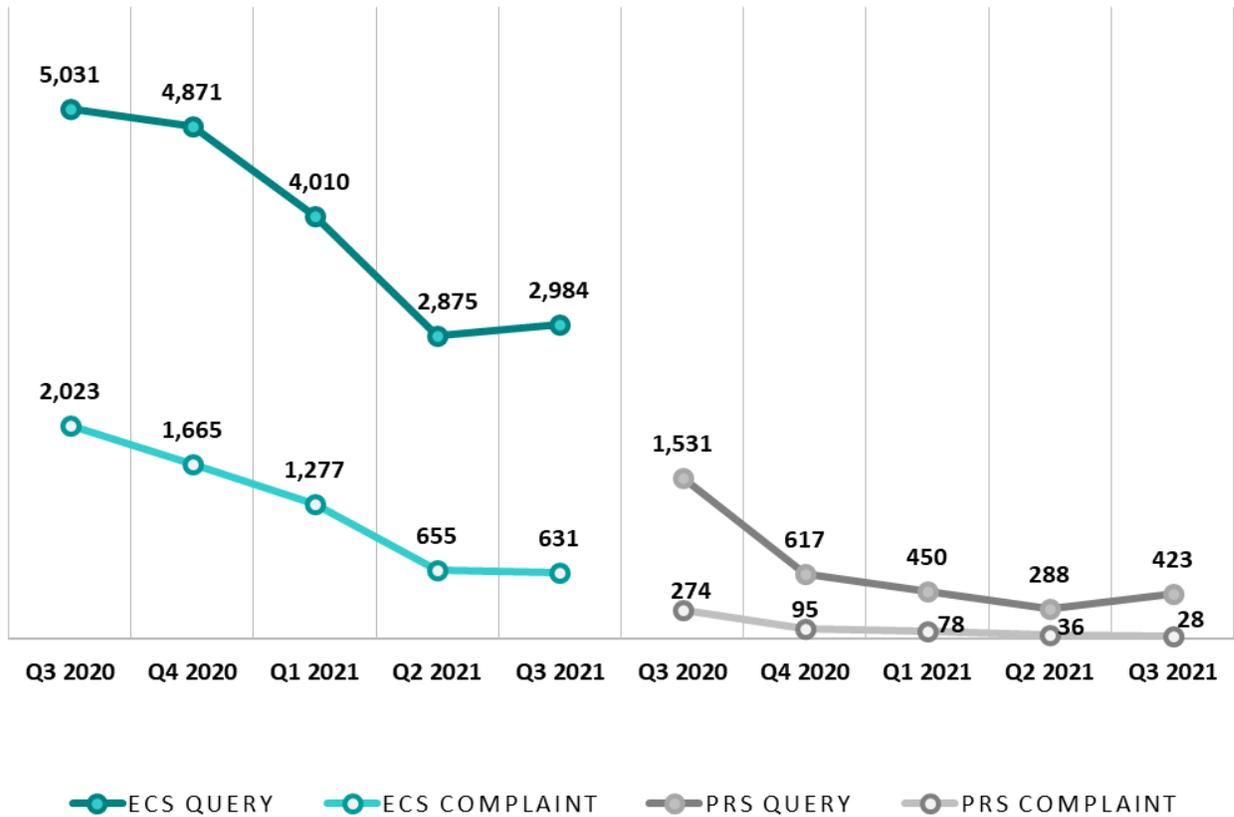


Figure 7: ECS and PRS complaints and queries recorded Q3 2020 – Q3 2021

4: Mobile Service Provider Statistics

4.1 Mobile Service Provider ECS Queries vs Complaints

Figure 8 shows the number of ECS queries and complaints recorded for Eir⁵, 3⁶, Vodafone⁷ and ‘Other’ Mobile Service Providers⁸, comparing Q2 2021 to Q3 2021. The total number of issues recorded for Mobile Service Providers in Q3 2021 was 1,219, a 2% increase compared to Q2 2021, where 1,195 issues were recorded.

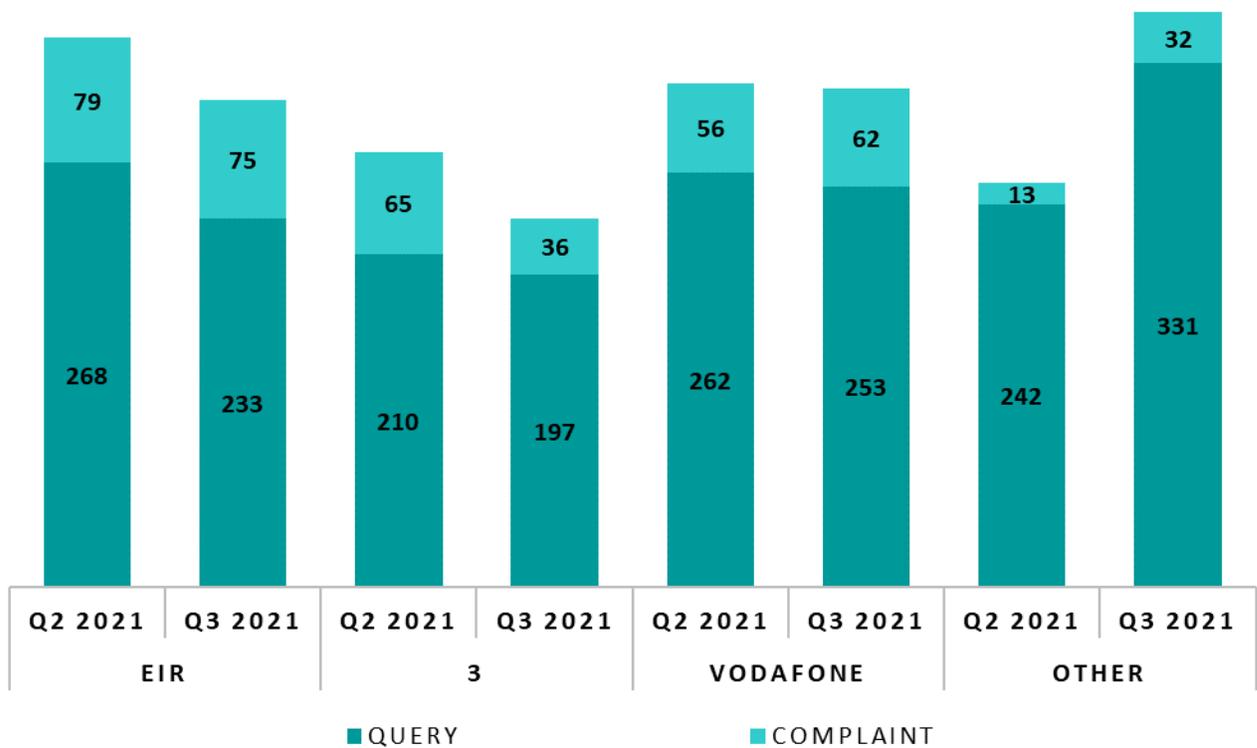


Figure 8: Number of ECS queries and complaints by Mobile Service Provider Q2 2021 vs Q3 2021

⁵ On this chart, issues recorded for GoMo are included in Eir’s figures.

⁶ On this chart, issues recorded for 48 are included in 3’s figures.

⁷ On this chart, issues recorded for Clear Mobile are included in Vodafone’s figures.

⁸ ‘Other’ Mobile Service Providers includes issues recorded for those Mobile Service Providers not named in Figure 8, or where the Mobile Service Provider is not provided by the consumer. This allows a holistic view of issues recorded across all Mobile Service Providers.

Figure 9 shows the split of queries to complaints recorded for each Mobile Service Provider^{6,7,8,8} in Figure 8, including the total industry average, comparing Q2 2021 to Q3 2021. The 'industry average' is based on all issues recorded within each quarter for all Mobile Service Providers.

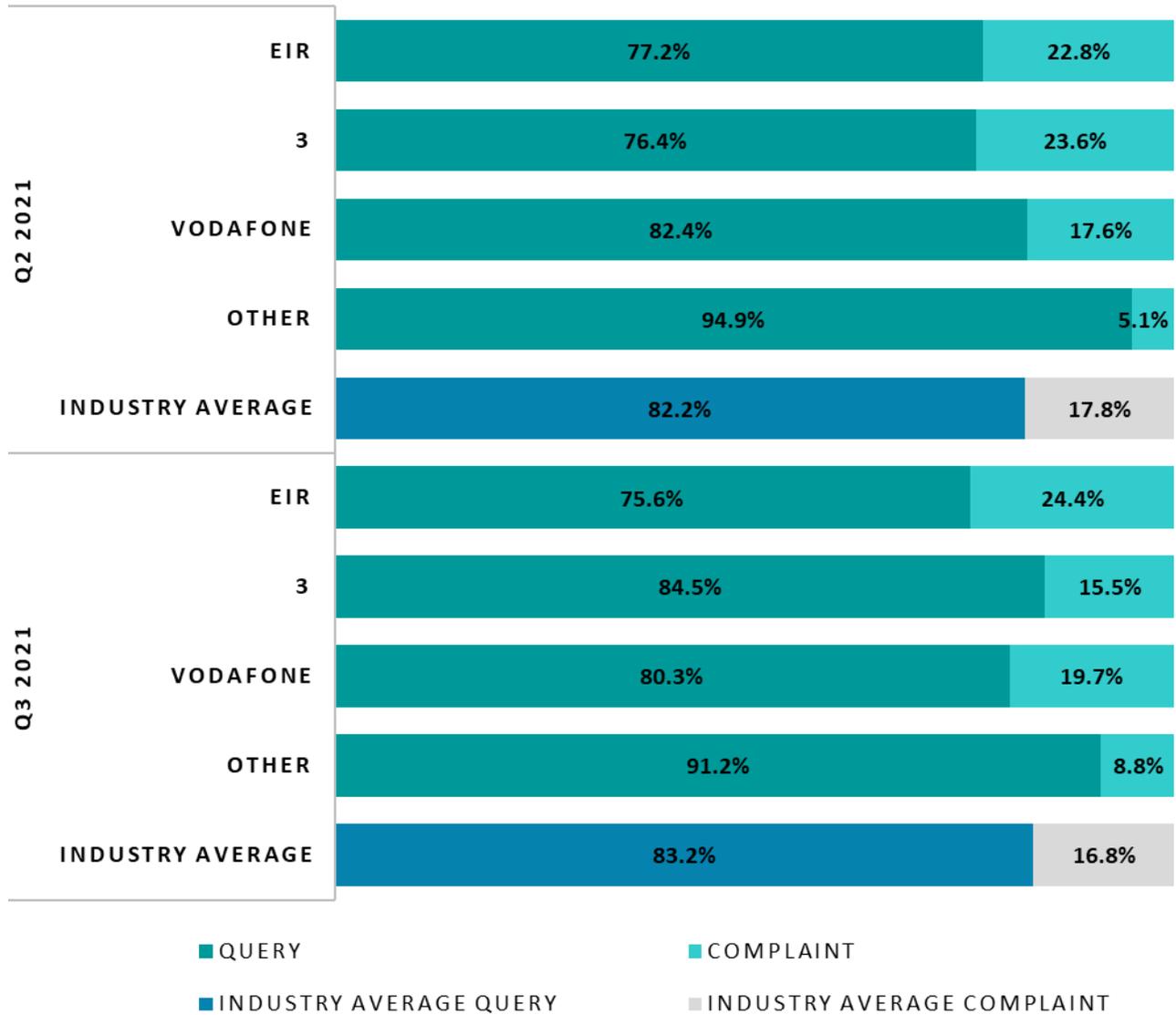
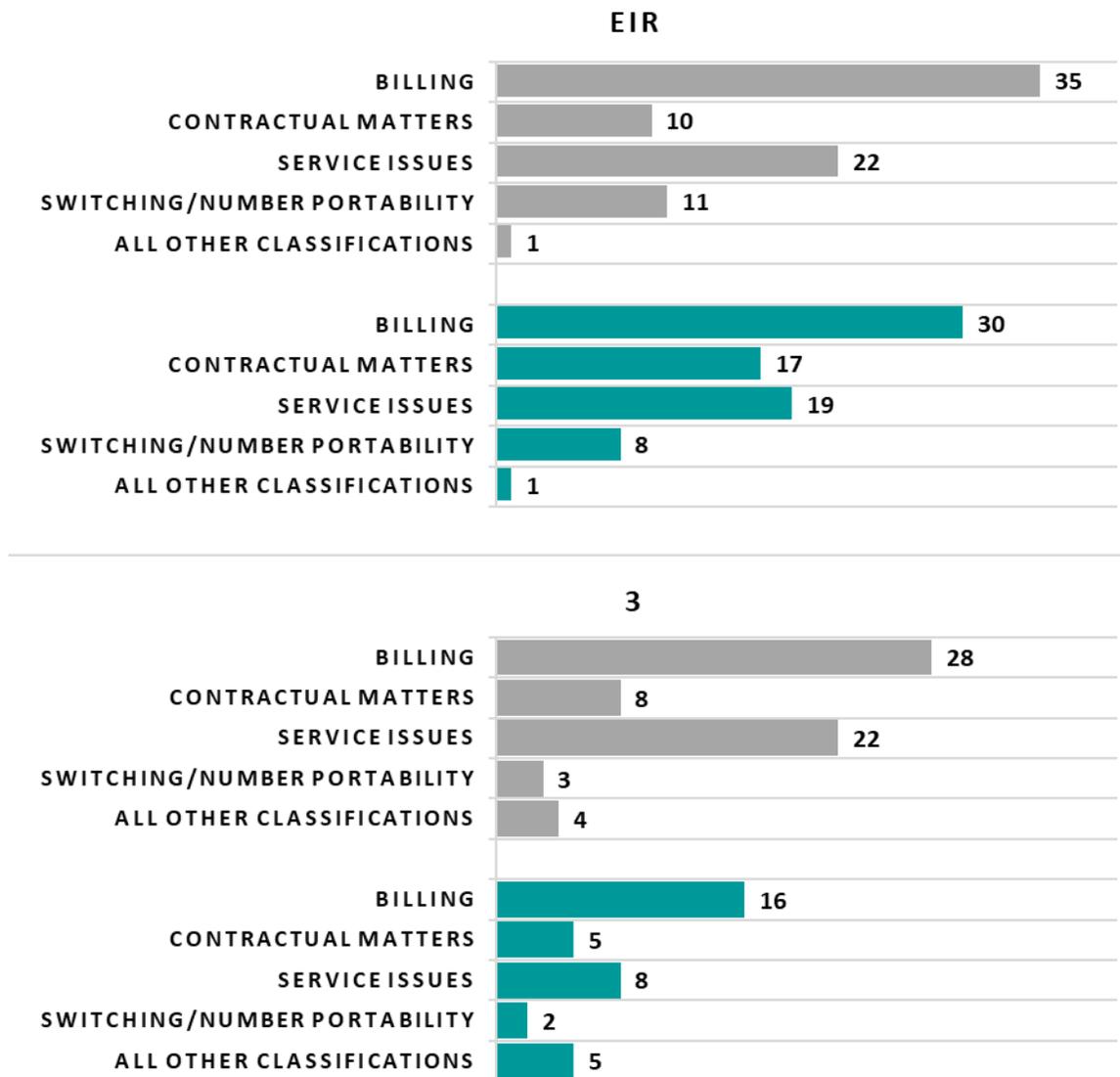


Figure 9: Split of ECS queries and complaints by Mobile Service Provider Q2 2021 vs Q3 2021

4.2 Mobile Service Provider ECS Complaints by Classification Type

Figure 10 shows ECS complaints by classification type for each Mobile Service Provider^{6,7,8,8} listed in Figure 8, comparing Q2 2021 with Q3 2021. For details of the highest number of issues recorded for each Mobile Service Provider, see Figure 11.



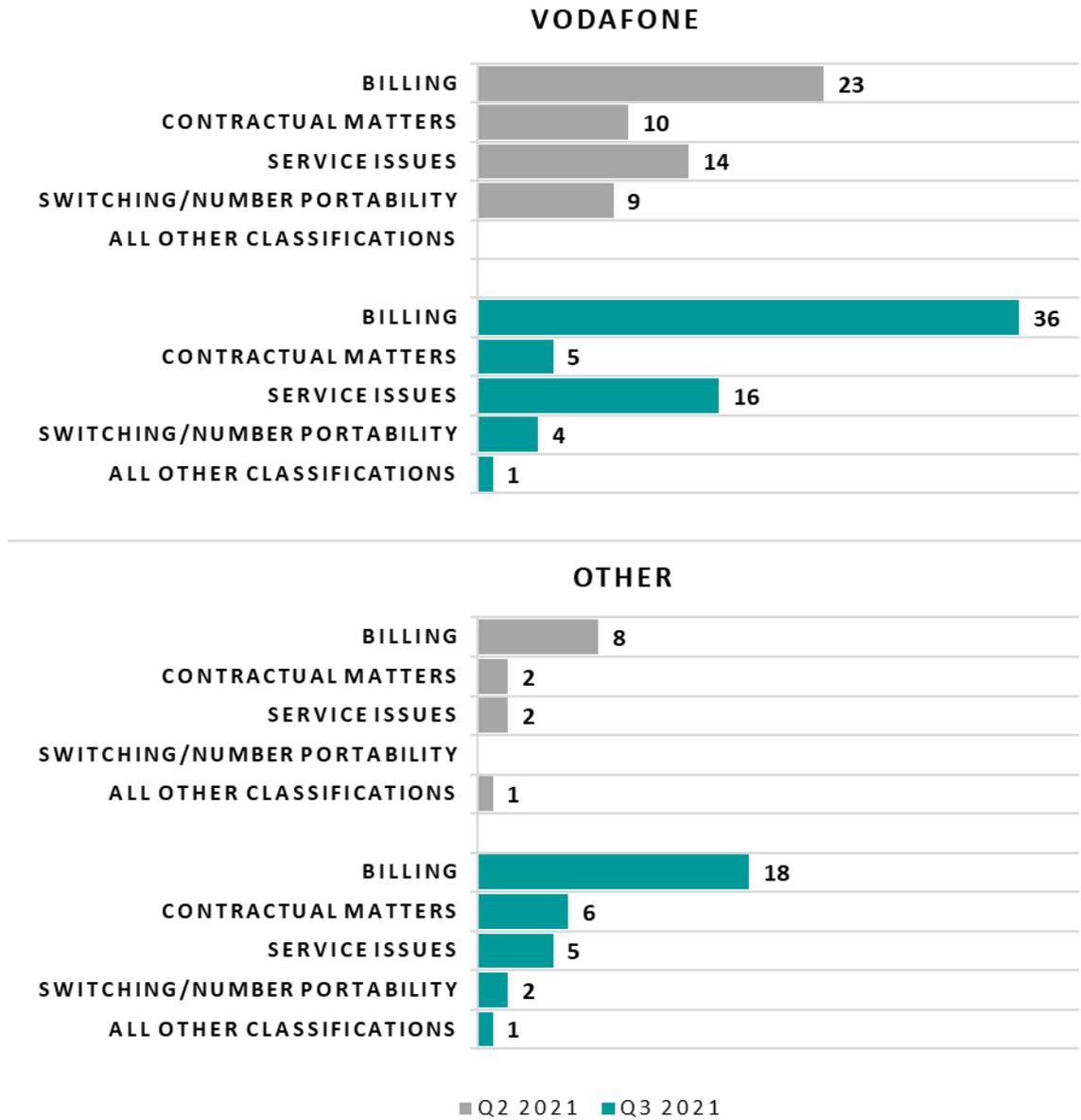


Figure 10: Mobile Service Provider ECS complaints by classification type Q2 2021 vs Q3 2021

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^{6,7,8} listed in Figure 8, as reported by consumers, comparing Q2 2021 to Q3 2021.

	Number of Issues Q2 2021	Number of Issues Q3 2021
Eir		
Billed more than agreed amount	44	42
Loss of service	24	33
Mobile coverage	16	22
Refund not received	28	17
Billed after cancellation	28	16
Contract termination issues - cancellation procedures		16
Switching/number portability - delay switching	17	14
Equipment issues - handset	15	14
Service issues - intermittent service	14	9
Switching/number portability - unlock code issue	11	8
3		
Billed more than agreed amount	40	27
Loss of service	9	16
Billed after cancellation	11	12
Credit not applied		12
Switching/number portability - unlock code issue	10	11
Misleading sales		11
Switching/number portability - delay switching		11
Mobile coverage	22	10
Equipment issues - handset	20	9
Service issues - intermittent service	11	9

Vodafone		
Mobile coverage	19	42
Billed more than agreed amount	23	25
Billed after cancellation	18	25
Equipment issues - handset	15	18
Loss of service	24	16
Switching/number portability - unlock code issue	33	15
Switching/number portability - delay switching	12	13
Billed for calls not made		12
Contract termination issues - cancellation procedures	12	10
Switching/number portability - number loss	10	10

Figure 11: Highest number of issues recorded by Mobile Service Provider Q2 2021 vs Q3 2021

4.4 Mobile Service Provider ECS Complaints Closed in Q3 2021

Figure 12 shows the number of ECS complaints closed in Q3 2021, for each Mobile Service Provider^{6,7,8} listed in Figure 8, broken down by number of working days open (Monday to Friday, and excluding public holidays). Complaints closed within Q3 2021 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

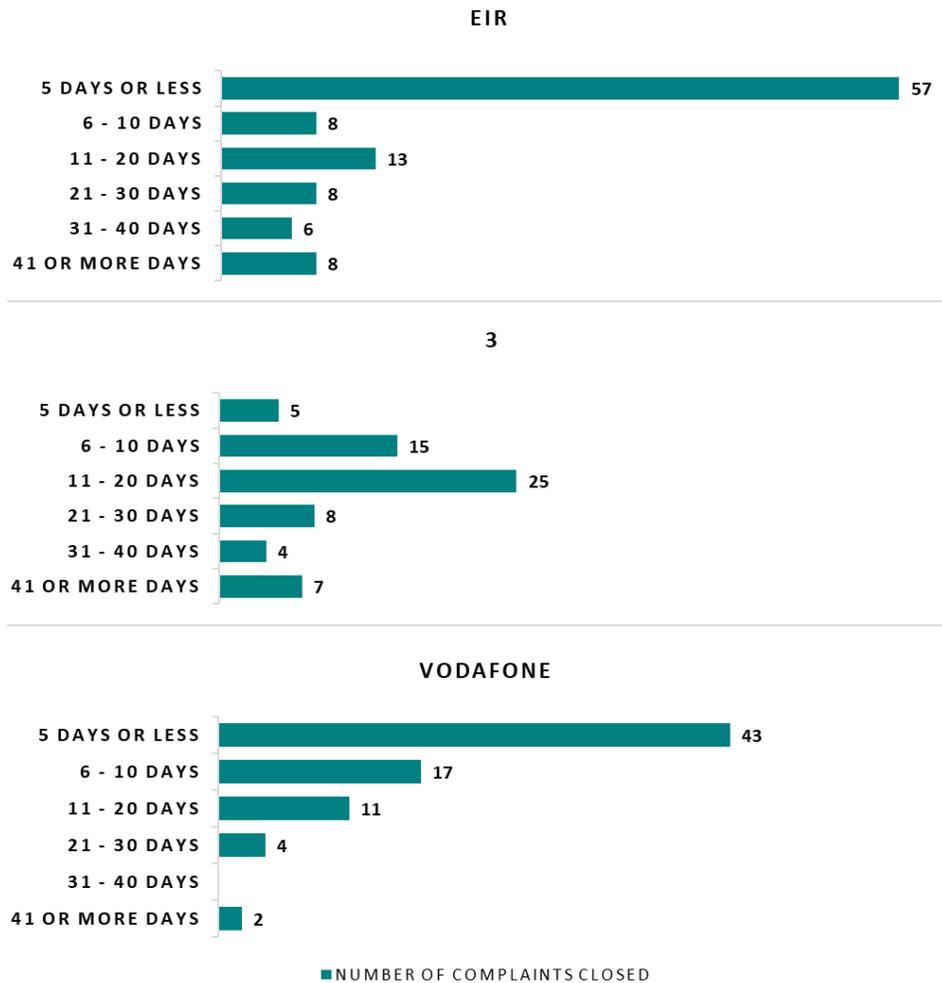


Figure 12: ECS complaints closed in Q3 2021 by Mobile Service Provider and number of working days open

Complaint 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 13^{6,7,8,8} shows the median resolution time for ECS complaints in Figure 12, broken down by number of working days open (Monday to Friday, and excluding public holidays), comparing Q2 2021⁹ to Q3 2021. Complaints closed within Q3 2021 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 July 2021. The 'industry median' is a 'snapshot' based on all complaints closed within each quarter for all Mobile Service Providers.

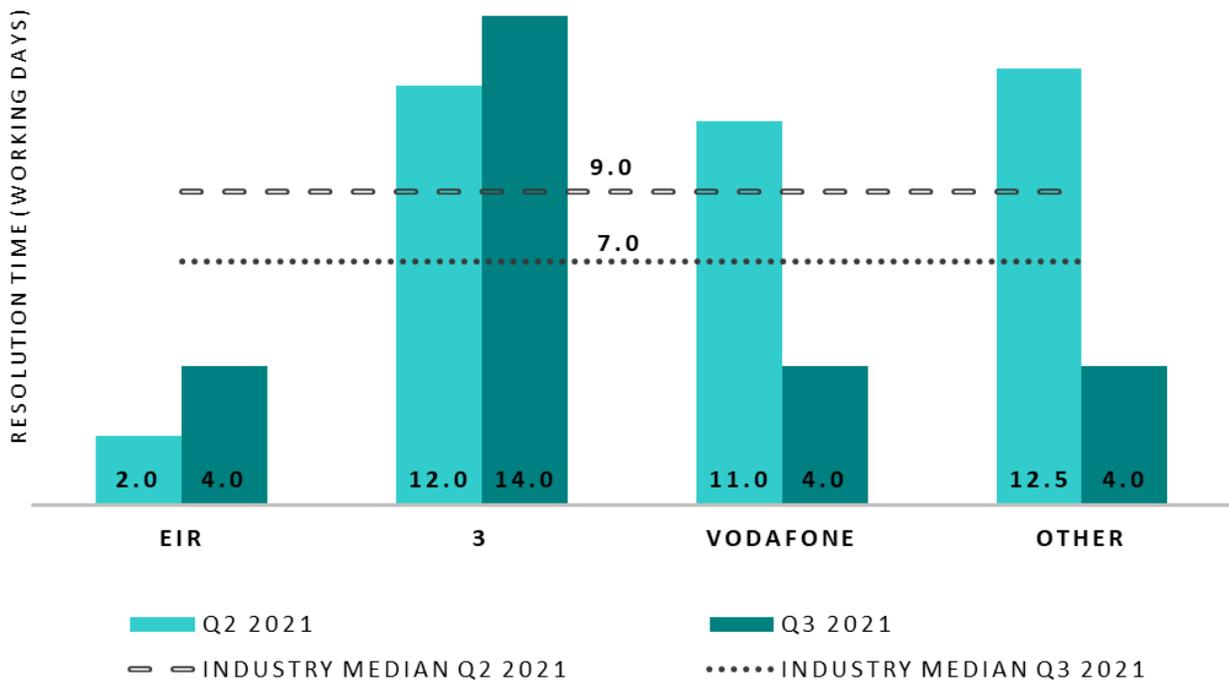


Figure 13: Median complaint resolution time by Mobile Service Provider Q2 2021 vs Q3 2021

⁹ For details of complaints closed in Q2 2021, see ComReg Consumer Line Statistics Report Q2 2021.

Figure 14^{6,7,8,8} provides a further breakdown of the Q3 2021 complaint resolution time of ECS complaints in Figure 13. In Figure 14, 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.

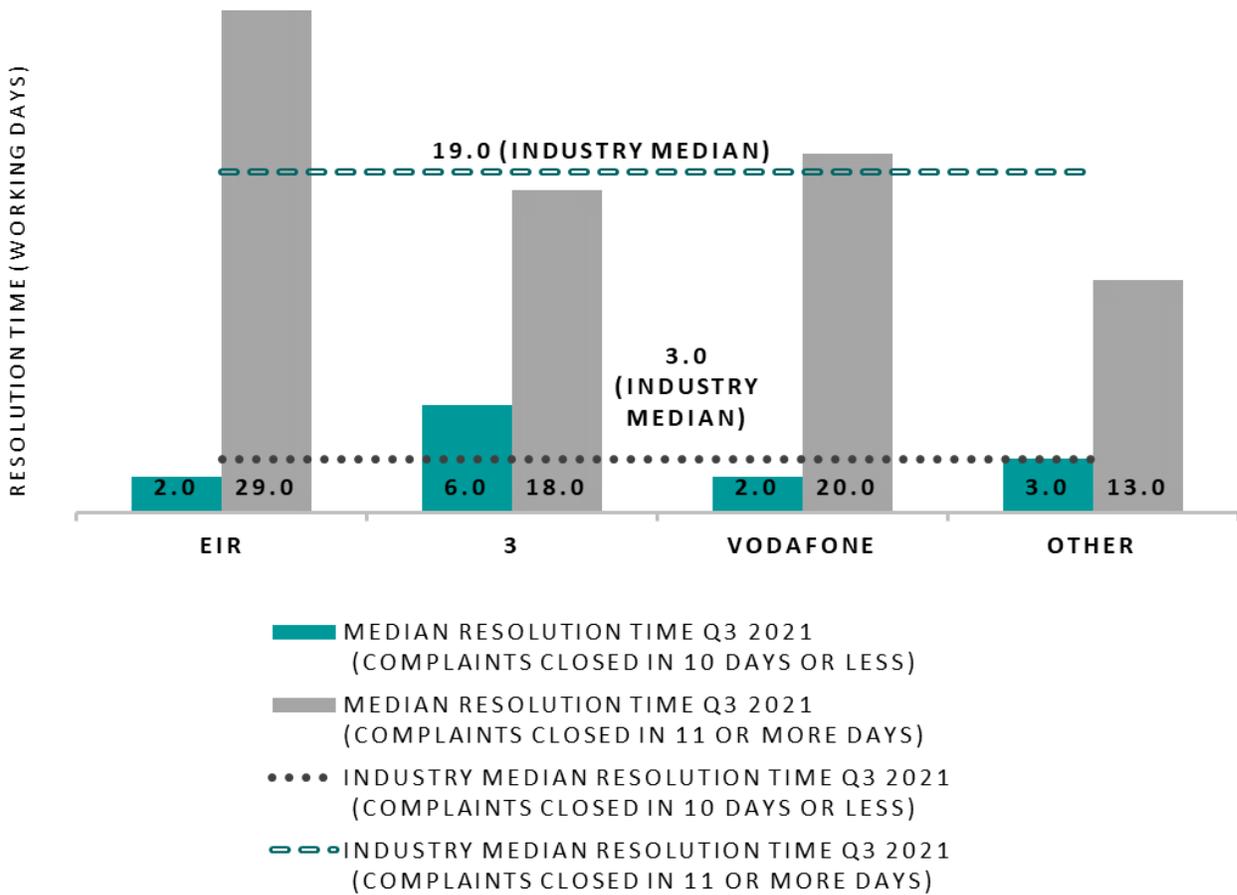


Figure 14: Median complaint resolution time by Mobile Service Provider Q3 2021, complaints closed in 10 days or less vs complaints closed in 11 days or more

4.5 Mobile Service Provider ECS Complaints Open at 30 September 2021

Figure 15 shows the number ECS complaints open at 30 September 2021, for each Mobile Service Provider^{6,7,8} listed in Figure 8, broken down by the number of working days elapsed since they were first escalated to the Service Provider.

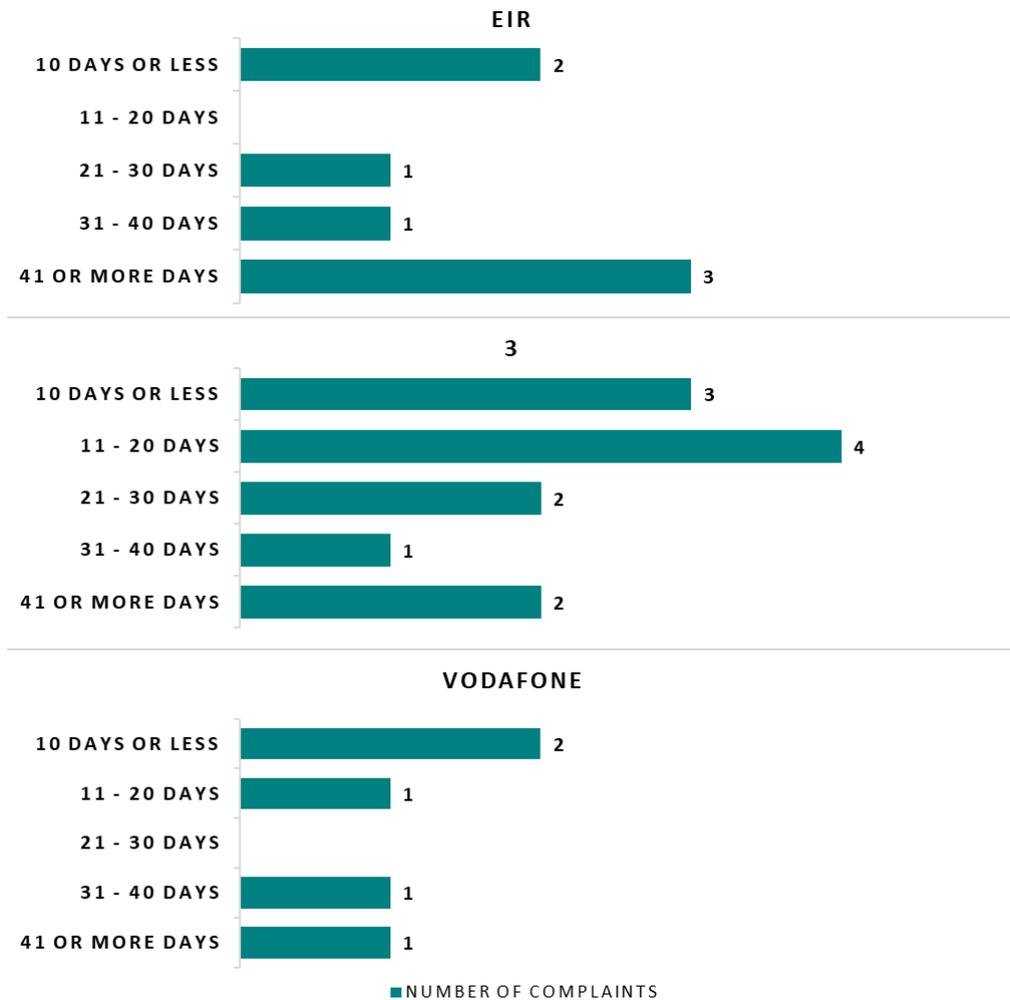


Figure 15: Mobile Service Provider ECS complaints open at 30 September 2021 by number of working days since first escalation

4.6 Mobile Service Provider ECS Complaints per 100,000 Subscribers

Figure 16 below shows the average number of complaints per 100,000 subscribers for each Mobile Service Provider^{6,7,8} listed in Figure 8 and the total industry average, comparing Q2 2021 to Q3 2021. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Mobile Service Providers.

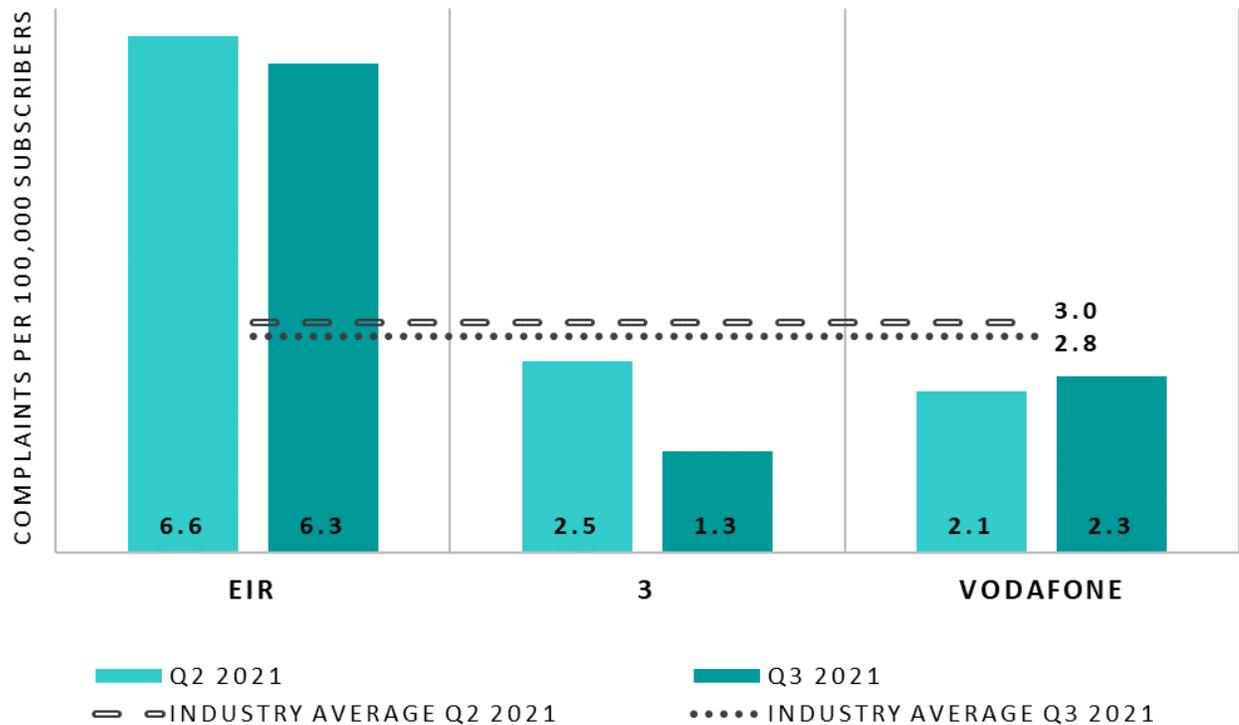


Figure 16: ECS complaints per 100,000 subscribers by Mobile Service Provider Q2 2021 vs Q3 2021

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 17 below shows the number of PRS issues raised with ComReg’s Consumer Line in Q3 2021 split by short code and premium rate service provider¹⁰ (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^{6,7} (where the total number of issues recorded for the Mobile Service Provider is greater than 40 issues).

Network Operator	Short Code and Premium Rate Service Provider			Total
	57976 (txtNation Ltd)	57977 (txtNation Ltd)	Other	
Eir	88	28	69	185
Tesco Mobile Ireland	32	30	12	74
3	41	7	25	73
Other	67	24	28	119
Total	228	89	134	451

Figure 17: Number of PRS issues recorded by PRS short code, premium rate service provider and Mobile Service Provider Q3 2021

¹⁰ <http://www.irishstatutebook.ie/eli/2010/act/2/enacted/en/print>, Section 3.

“premium rate service provider” means a person who does any or all of the following, for gain: (a) provides the contents of a premium rate service, (b) exercises editorial control over the contents of a premium rate service, (c) packages together the contents of a premium rate service for the purpose of facilitating its provision, (d) makes available a facility as part of a premium rate service, (e) transfers a premium rate service from a content provider to one or more electronic communications networks, or (f) provides the electronic communications service over which a premium rate service is provided, or provides the electronic communications network over which a premium rate service is transmitted.

Figure 18 shows the average number of PRS issues recorded (rounded to the nearest whole number) per 100,000 subscribers for each Mobile Service Provider^{6,7} listed in Figure 17 and the total industry average, comparing Q2 2021 to Q3 2021. The ‘industry average’ is based on all PRS issues recorded for all Mobile Service Providers within each quarter.

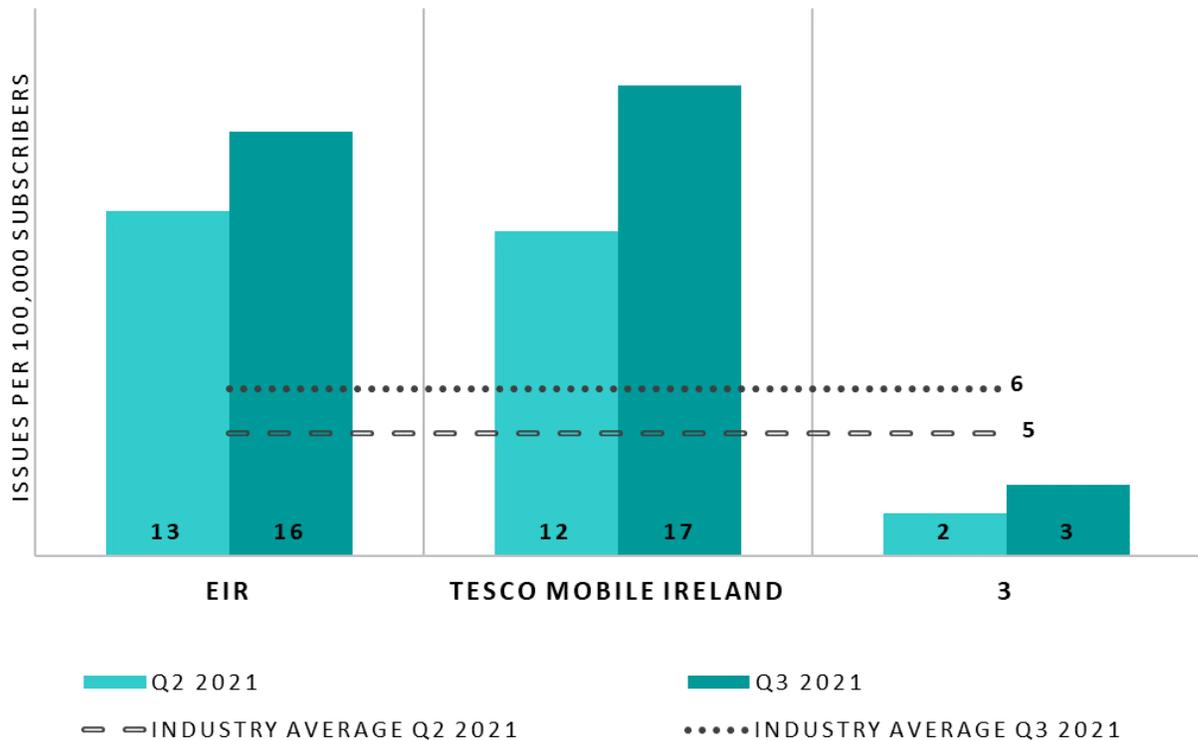


Figure 18: PRS issues by ECS Provider per 100,000 subscribers Q2 2021 vs Q3 2021

5: Fixed Service Provider Statistics

5.1 Fixed Service Provider ECS Queries vs Complaints

Figure 19 shows the number of ECS queries and complaints recorded for Eir, Sky Ireland Limited, Virgin Media, Vodafone, and all 'Other'¹¹ Fixed Service Providers, comparing Q2 2021 to Q3 2021. The total number of issues recorded for Fixed Service Providers in Q3 2021 was 2,396, a 3% decrease compared to Q2 2021, where 2,335 issues were recorded.

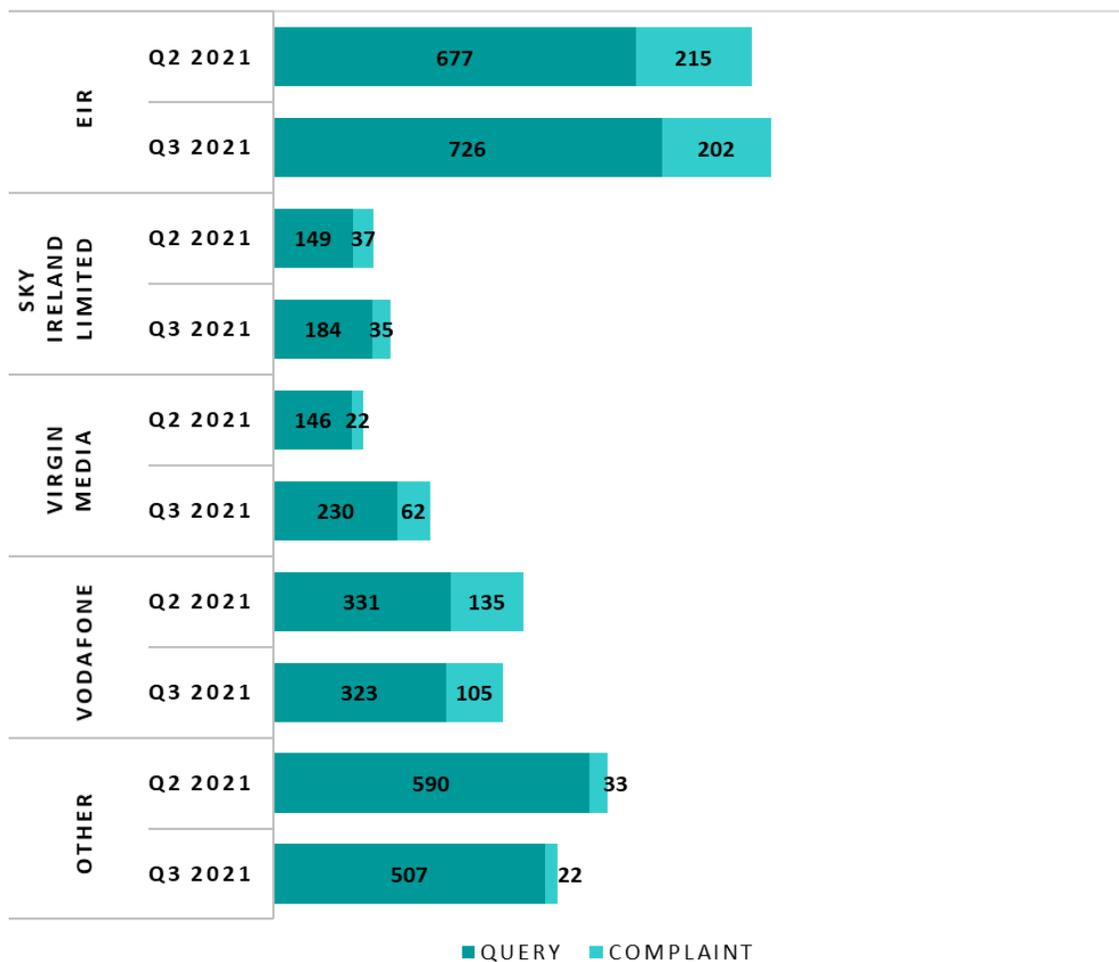


Figure 19: Number of ECS issues queries and complaints by Fixed Service Provider Q2 2021 vs Q3 2021

¹¹ 'Other' Fixed Service Providers includes issues recorded for those Fixed Service Providers not named in Figure 19, or where the Fixed Service Provider is not provided by the consumer. This allows a holistic view of issues recorded across all Fixed Service Providers.

Figure 20 shows the split of queries to complaints recorded for Eir, Sky Ireland Limited, Virgin Media and Vodafone, including the total industry average comparing Q2 2021 to Q3 2021. The 'industry average' is based on all issues recorded within each quarter for all Fixed Service Providers.

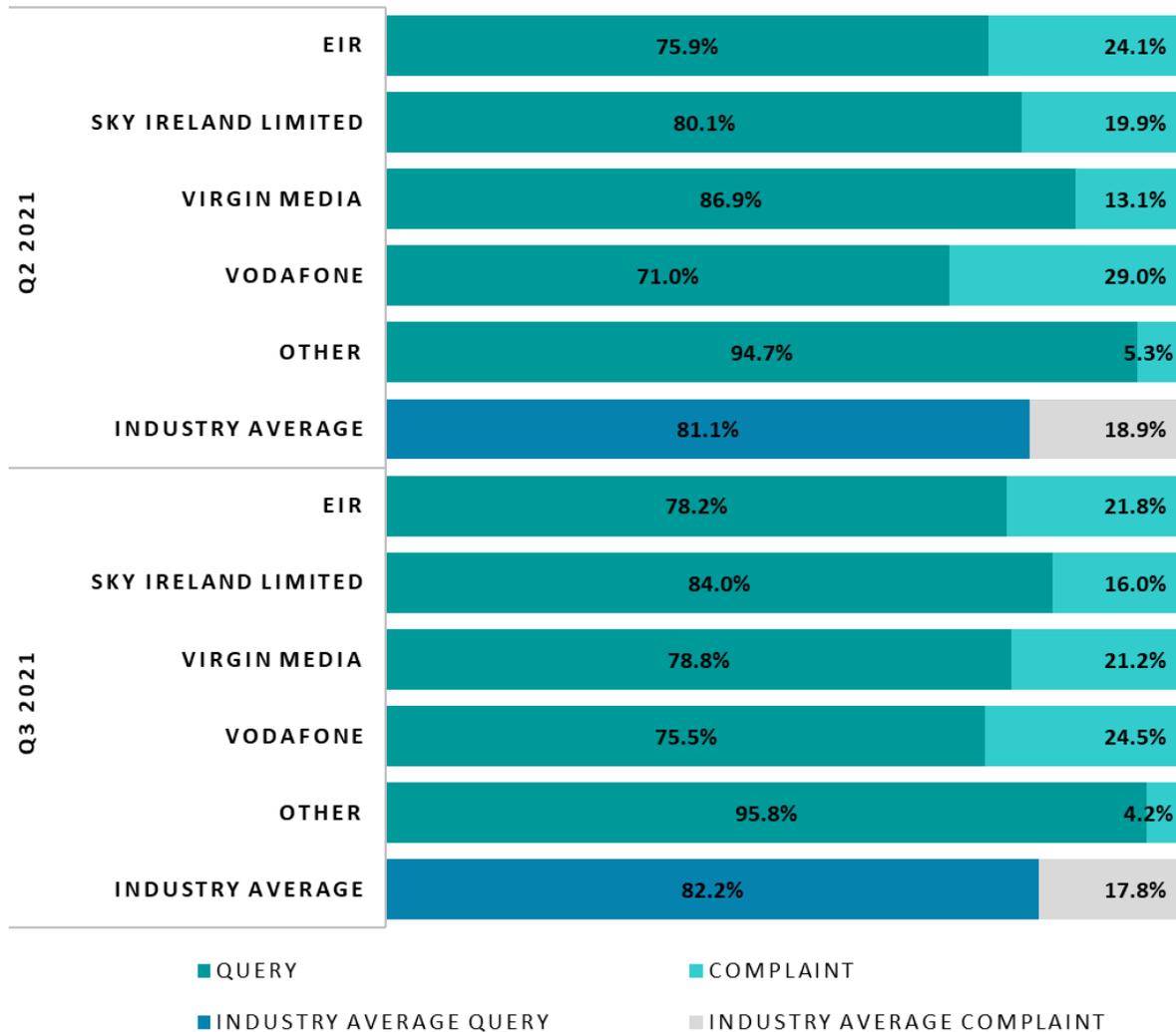
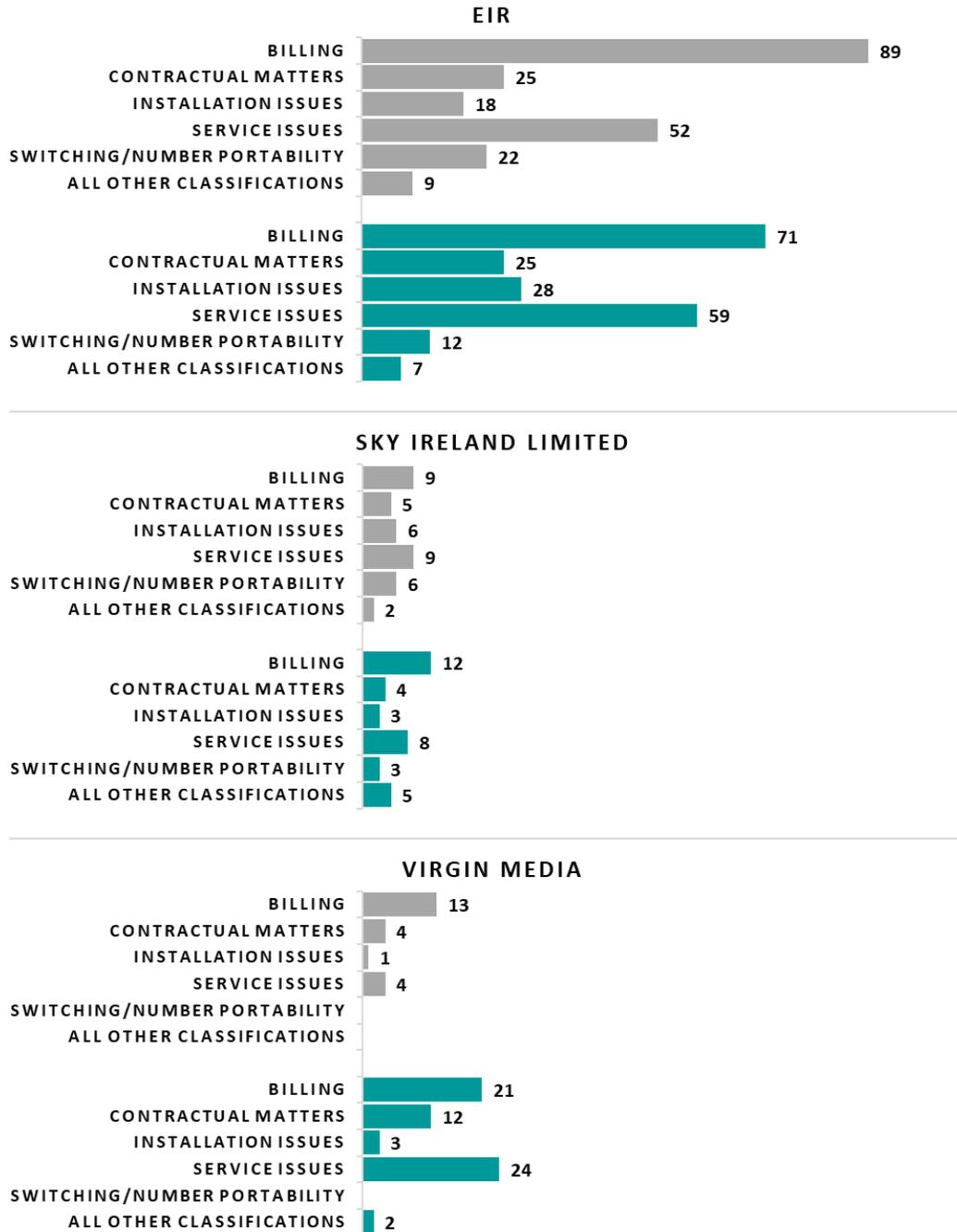


Figure 20: Split of ECS queries and complaints by Fixed Service Provider Q2 2021 vs Q3 2021

5.2 Fixed Service Provider ECS Complaints by Classification Type

Figure 21 shows ECS complaints by classification type for each Fixed Service Provider listed in Figure 19, comparing Q2 2021 with Q3 2021. For details of the highest number of issues recorded for each Fixed Service Provider, see Figure 22.



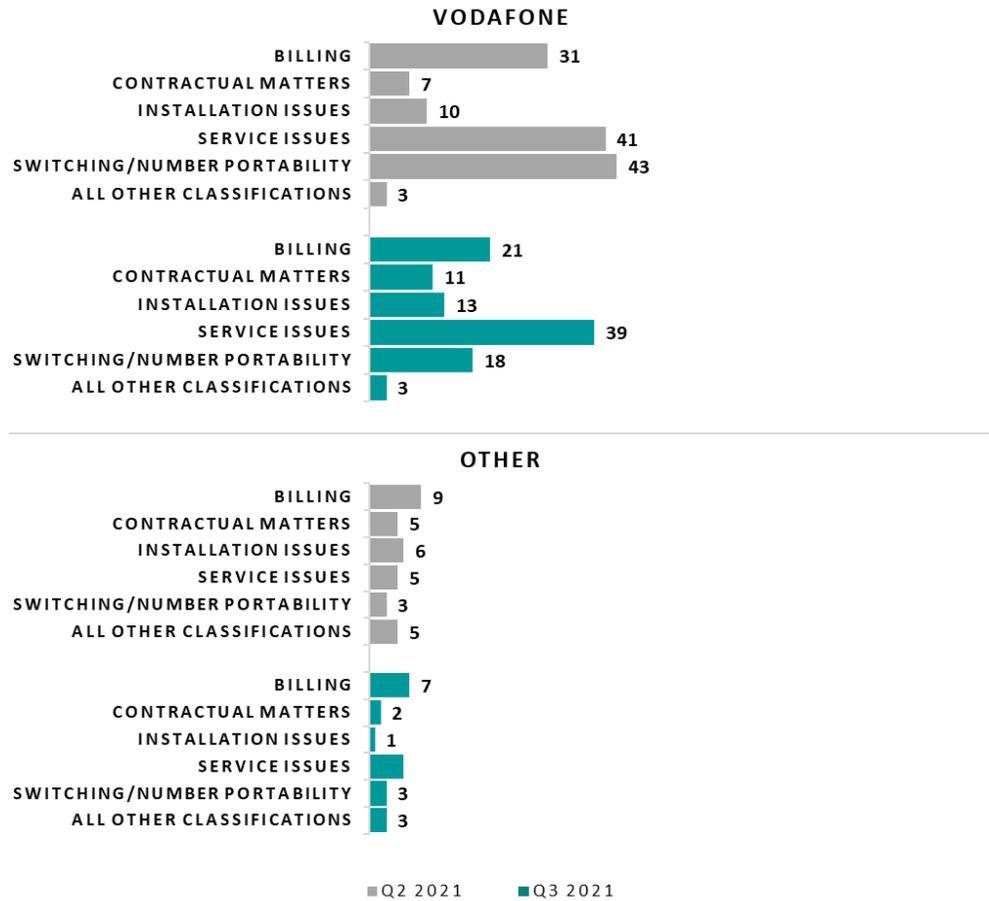


Figure 21: Fixed Service Provider ECS complaints by classification type Q2 2021 vs Q3 2021

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 19, as reported by consumers, comparing Q2 2021 to Q3 2021.

	Number of Issues Q2 2021	Number of Issues Q3 2021
Eir		
Billed more than agreed amount	84	103
Loss of service	91	90
Billed after cancellation	102	87
Service availability	95	64
Delay in installation	50	55
Contract change notification - pricing transparency		52
Service issues - intermittent service	42	42
Contract termination issues - cancellation procedures	40	41
Refund not received	36	32
Contract termination issues - cancellation not accepted	31	26
Sky Ireland Limited		
Loss of service	15	32
Billed after cancellation	20	24
Billed more than agreed amount	12	19
Delay in installation	12	13
Service availability	7	13
Contract termination issues - cancellation procedures		12
Net neutrality - broadband speeds received	8	11
Refund not received		10
Accessing complaints process - issue lodging formal complaint		9
Service issues - intermittent service	23	8

Virgin Media		
Loss of service	9	56
Billed more than agreed amount	25	33
Service issues - intermittent service	6	32
Contract termination issues - cancellation procedures	5	24
Accessing complaints process - issue lodging formal complaint		20
Double billed		10
Billed after cancellation	16	9
Contractual matters - pricing transparency	10	8
Net neutrality - broadband speeds received		8
Equipment issues - other equipment	7	7
Vodafone		
Loss of service	99	89
Billed after cancellation	37	38
Service issues - intermittent service	35	34
Switching/number portability - number loss	54	33
Delay in installation	24	29
Billed more than agreed amount	29	25
Switching/number portability - UAN/CRN issue	15	17
Switching/number portability - delay switching	24	16
Contract termination issues - cancellation procedures		13
Service availability	15	12

Figure 22: Highest number of issues recorded by Fixed Service Provider Q2 2021 vs Q3 2021

5.4 Fixed Service Provider ECS Complaints Closed in Q3 2021

Figure 23 below shows ECS complaints closed in Q3 2021, for each Fixed Service Provider listed in Figure 19, broken down by number of working days. Complaints closed within Q3 2021 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

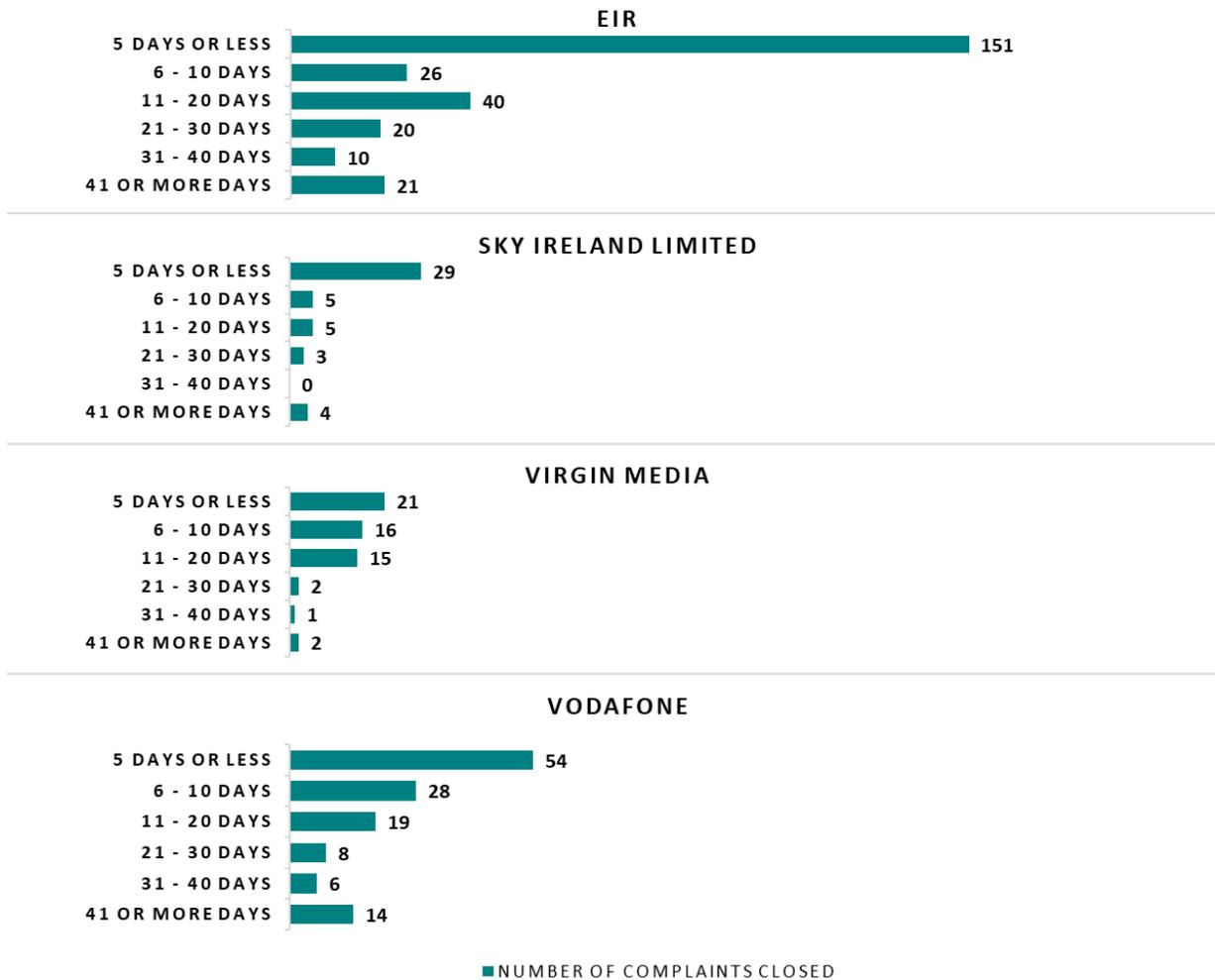


Figure 23: Fixed Service Provider ECS complaints closed in Q3 2021 by number of working days open

Complaint 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 24 shows the median resolution time for ECS complaints in Figure 23, broken down by number of working days open (Monday to Friday, and excluding public holidays), comparing Q2 2021^{Error! Bookmark not defined.} to Q3 2021. Complaints closed within Q3 2021 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 July 2021. The 'industry median' is a 'snapshot' based on all complaints closed within each quarter for all Fixed Service Providers.

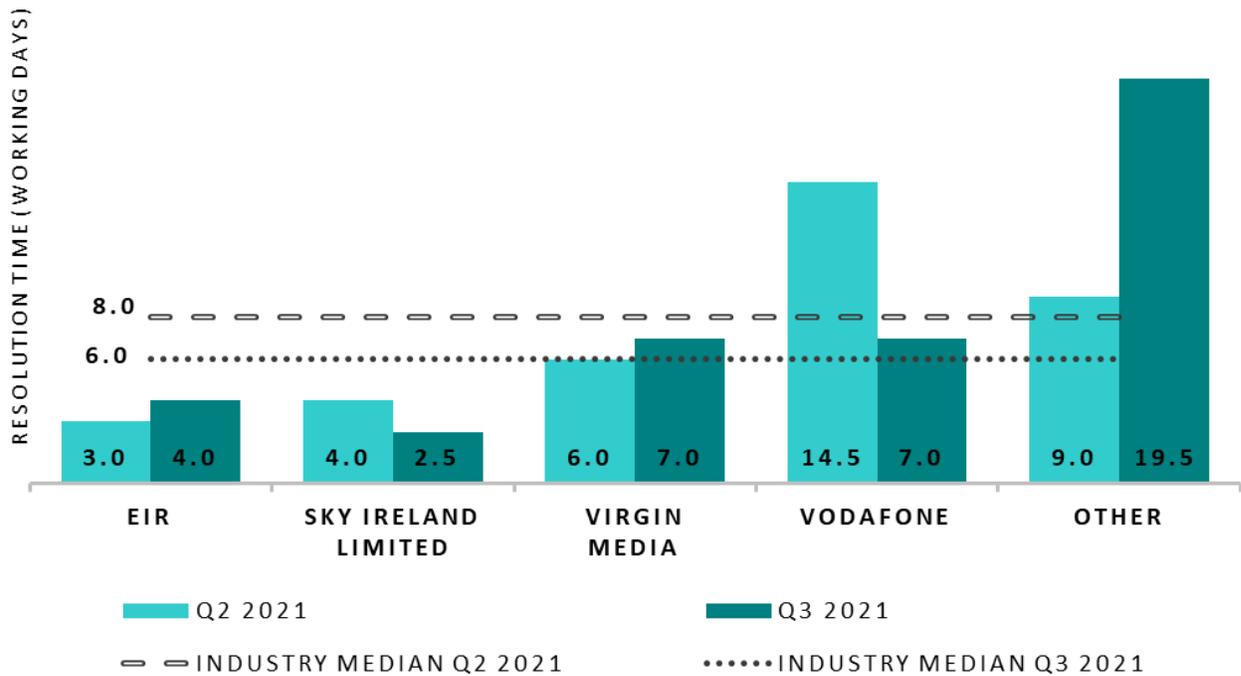


Figure 24: Median complaint resolution time by Fixed Service Provider Q2 2021 vs Q3 2021

Figure 25 provides a further breakdown of the Q3 2021 complaint resolution time of ECS complaints in Figure 24. In Figure 25, 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.

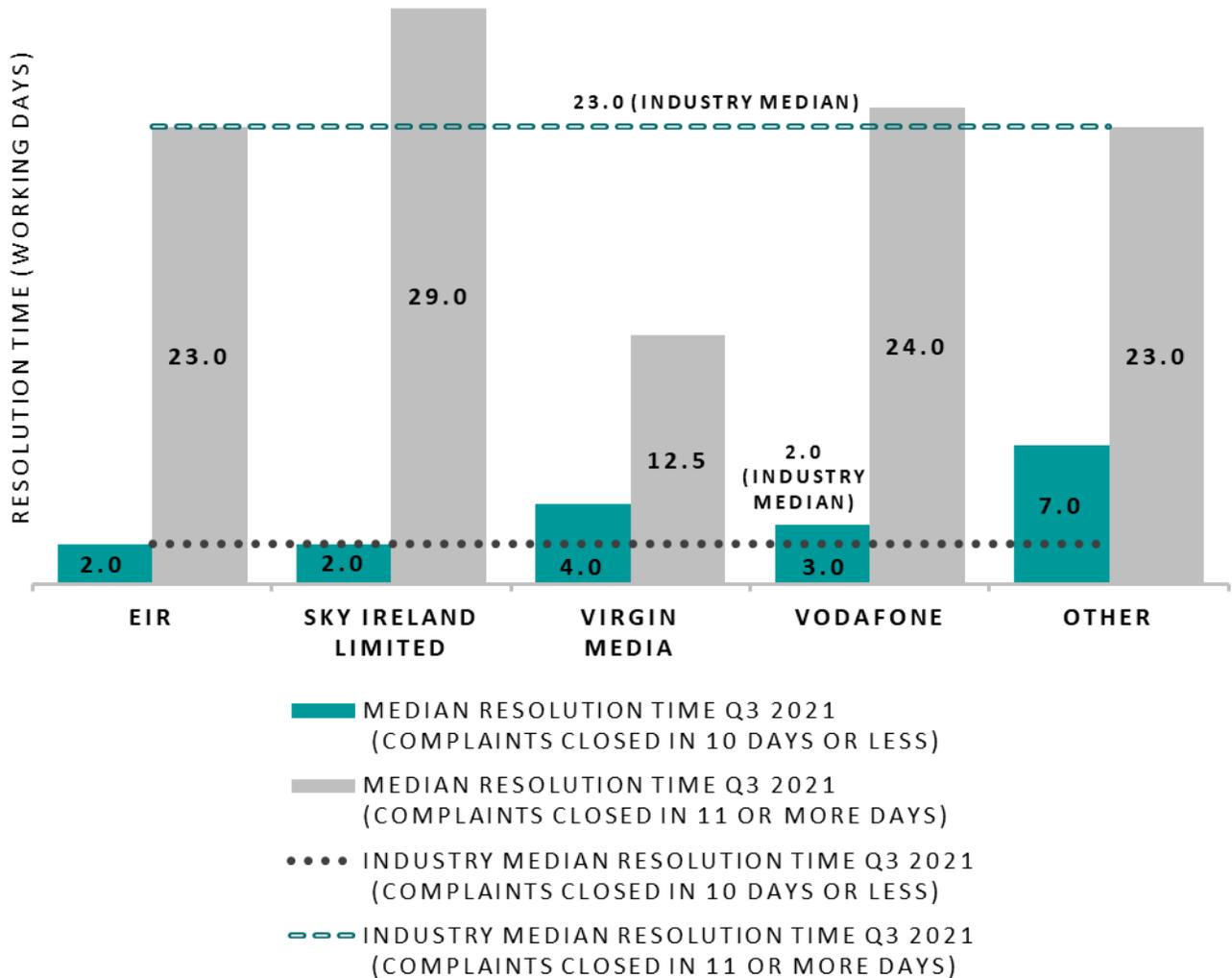


Figure 25: Median complaint resolution time by Fixed Service Provider Q3 2021, complaints closed in 10 days or less versus complaints closed in 11 days or more

5.5 Fixed Service Provider ECS Complaints Open at 30 September 2021

Figure 26 shows the number of ECS complaints open at 30 September 2021, for each Fixed Service Provider listed in Figure 19, broken down by number of working days elapsed since they were first escalated to the Service Provider.

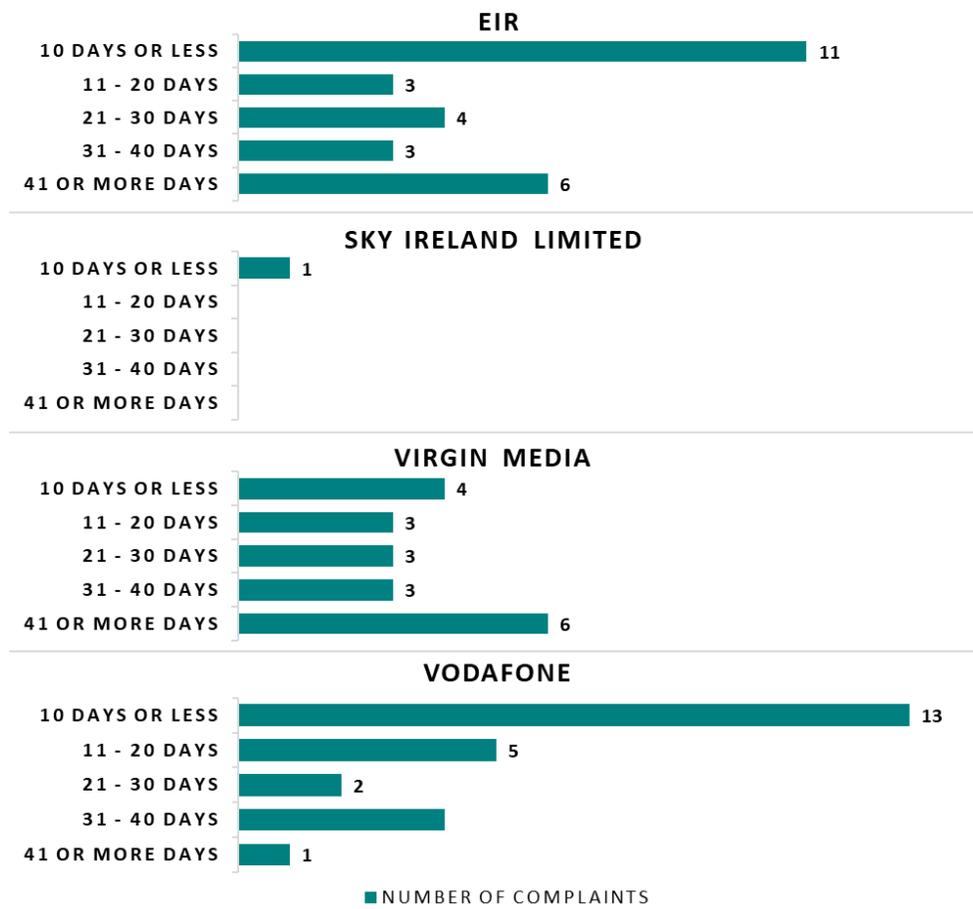


Figure 26: Fixed Service Provider ECS complaints open at 30 September 2021 by number of working days since first escalation

5.6 Fixed Service Provider ECS Complaints per 100,000 Subscribers

Figure 27 below shows the average complaint rate per 100,000 subscribers for each Fixed Service Provider listed in Figure 19 and the total industry average, comparing Q2 2021 to Q3 2021. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Fixed Service Providers.

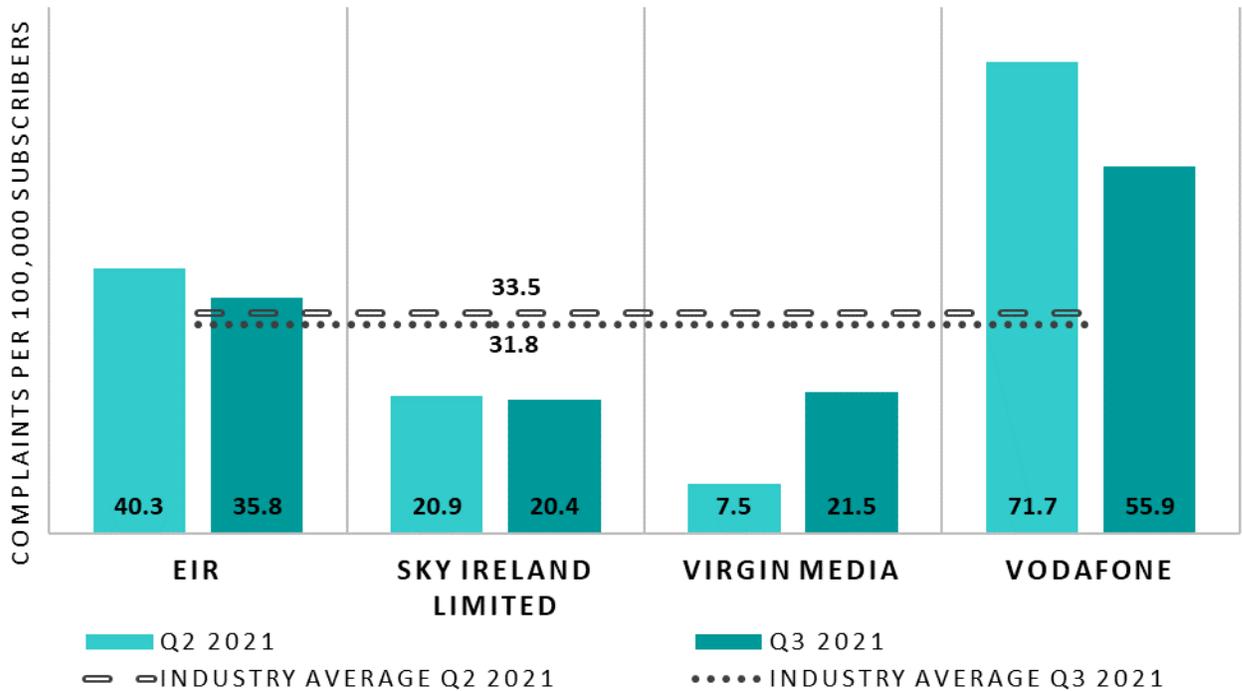


Figure 27: ECS complaints by Fixed Service Provider per 100,000 subscribers Q2 2021 vs Q3 2021

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 28 below shows the number of mobile coverage issues versus all other service issues (as reported by consumers) for each Mobile Service Provider^{6,7,8} listed in Figure 8, comparing Q2 2021 to Q3 2021.

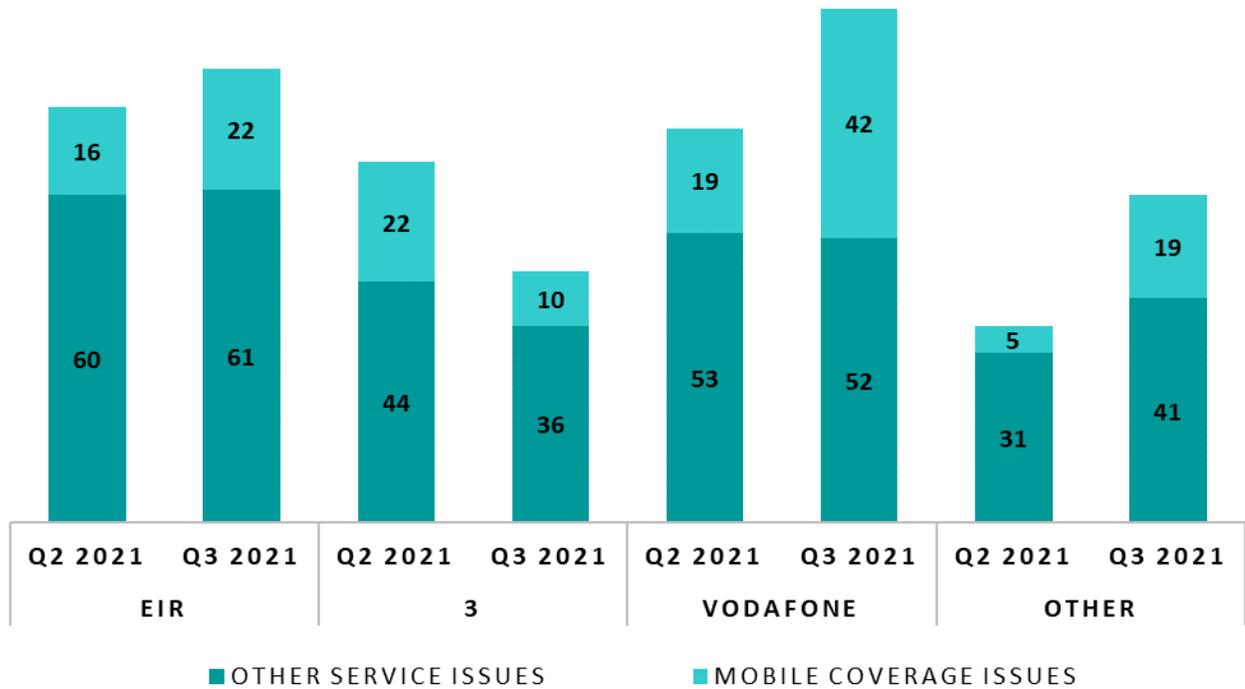
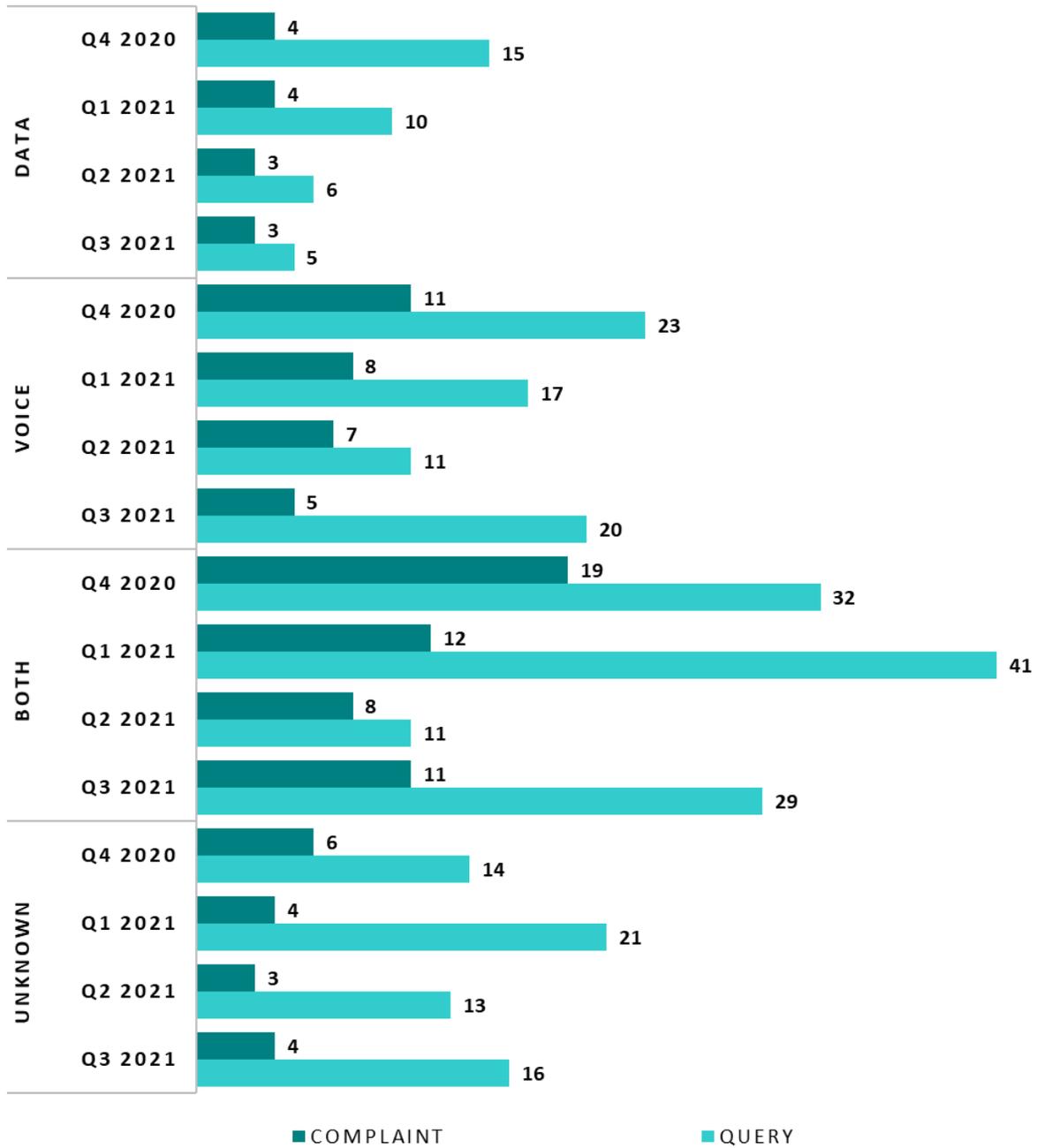


Figure 28: Number of ECS service issues by Mobile Service Provider Q2 2021 vs Q3 2021



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

Figure 29: Mobile Coverage Issues by Type Q4 2020 – Q3 2021

Figure 30 shows the average number of mobile coverage issues recorded per 100,000 subscribers for each Mobile Service Provider^{6,7,8,8} listed in Figure 8. The ‘industry average’ is based on mobile coverage issues recorded for all Mobile Service Providers within each quarter.

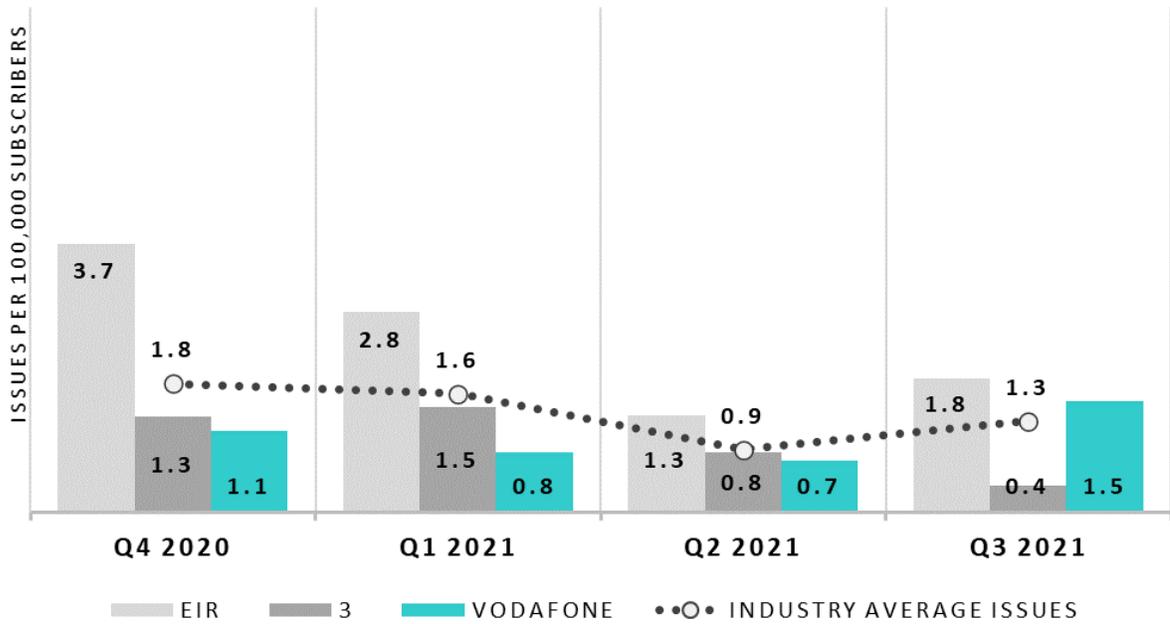


Figure 30: Mobile Coverage issues (per 100,000 Subscribers) Q4 2020 – Q3 2021

Annex 3: Classification Type Index

This Classification Type Index reflects the classification and sub-classification types¹² relevant to highest volume issues recorded in Q3 2021¹³.

<p>Billing includes:</p> <ul style="list-style-type: none"> Billed after cancellation Billed for calls not made Billed more than agreed amount Credit not applied Double billed Refund not received
<p>Contractual Matters includes:</p> <ul style="list-style-type: none"> Contract change notification - pricing transparency Contract termination issues - cancellation not accepted Contract termination issues - cancellation procedures Pricing transparency Misleading sales
<p>Customer Service includes:</p> <ul style="list-style-type: none"> Accessing complaints process - issue lodging formal complaint
<p>Installation Issues includes:</p> <ul style="list-style-type: none"> Delay in installation
<p>Service Issues includes:</p> <ul style="list-style-type: none"> Equipment issues - handset Equipment issues - other equipment Loss of service Mobile coverage Net neutrality - broadband speeds received Service availability Service issues - intermittent service
<p>Switching/Number Portability Issues includes:</p> <ul style="list-style-type: none"> Delay switching Number loss UAN/CRN issue Unlock code issue

¹² Sub-classification types may vary each quarter based on the nature of issues reported by consumers.

¹³ For detail on classification and sub-classification types relevant to highest volume issues recorded in Q2 2021, see ComReg Consumer Line Statistics Report Q2 2021.

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