



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

ComReg Consumer Line Statistics Report

Q4 2020 – 1 October to 31 December 2020

Information Notice

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An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

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Corrigendum Q4 2020

Consumer Line Statistics Report Q4 2020 - 1 October to 31 December 2020 (Document Reference ComReg 21/08) stated 362 queries and 78 complaints were recorded for Sky Ireland Limited in Q4 2020 (Figure 18); this should have stated 369 queries and 71 complaints were recorded for Sky Ireland Limited in Q4 2020. Accordingly, the following charts have been revised: Figure 5, Figure 6, Figure 18, Figure 19, Figure 20, Figure 22, Figure 23, Figure 24 and Figure 25.

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 Q4 2020¹.

In Q4 2020, ComReg's Consumer Care team recorded approximately 21,600 contacts and 7,992 issues. In Q3 2020, 9,559 issues were recorded, and approximately 27,000 consumer contacts were received. ComReg's Consumer Care team managed approximately 6,500 Service Provider contacts during Q4 2020, compared to 9,000 in Q3 2020. 78% of all issues recorded were queries and 22% of all issues were complaints. 82% of all issues recorded relate to ECS, 9% relate to PRS, and 9% relate to 'Not for ComReg'/Other. There was a 16% decrease in the total number of issues recorded compared to Q3 2020; ECS issues decreased by 7%, and PRS issues decreased by 61%.

In Q4 2020, ComReg's Consumer Care team recorded 689 Mobile Service Provider issues for Eir. 464 issues were recorded for 3. 451 issues were recorded for Vodafone. The median resolution time for Mobile Service Provider complaints was 9.0 working days, compared to 12.0 working days in Q3 2020. The average number of complaints per 100,000 subscribers was 7.1, compared to an average of 9.0 complaints per 100,000 subscribers in Q3 2020.

In Q4 2020, ComReg's Consumer Care team recorded 2,120 Fixed Service Provider issues for Eir. 139 issues were recorded for Imagine. 440 issues were recorded for Sky Ireland Limited. 278 issues were recorded for Virgin Media. 974 issues were recorded for Vodafone. The median resolution time for Fixed Service Provider complaints was 8.0 working days, compared to 10.0 working days in Q3 2020. The average number of complaints per 100,000 subscribers was 86.9, compared to an average of 103.2 complaints per 100,000 subscribers in Q3 2020.

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 Contacts

In Q4 2020, approximately 21,600 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 Q4 2020, phone and e-mail/online form continued to be the most popular methods of contact. ComReg’s Consumer Line received approximately 6,500 service provider contacts in Q4 2020.

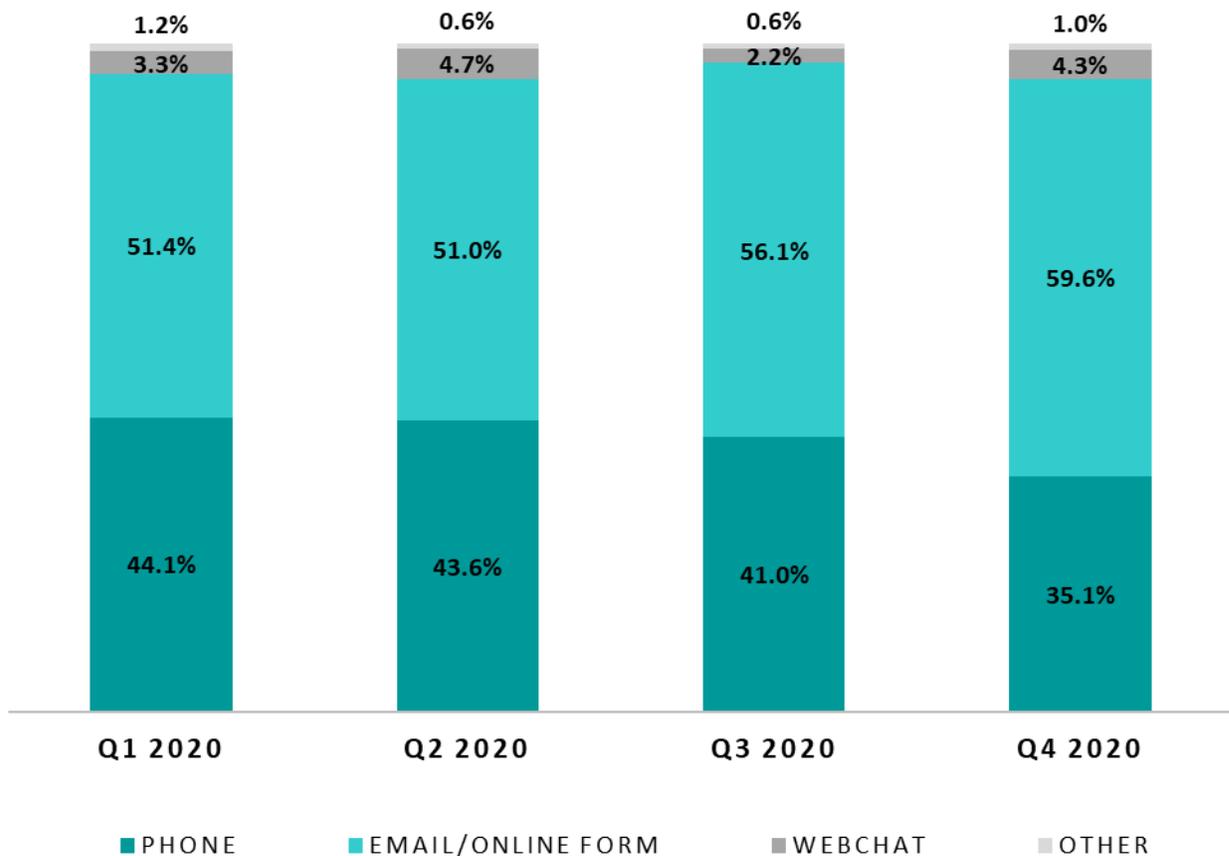


Figure 1: Split of contacts to ComReg’s Consumer Line by channel Q1 2020 – Q4 2020

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.

3: Consumer Issues Recorded

3.1 All Issues Recorded

In Q4 2020, ComReg recorded 7,992 issues which are classified across three main categories: ECS, PRS and ‘Not for ComReg/Other’. There was a 16% decrease in the total number of issues recorded compared to Q3 2020; ECS issues decreased by 7%, and PRS issues decreased by 61%. 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 Q4 2019 to Q4 2020.

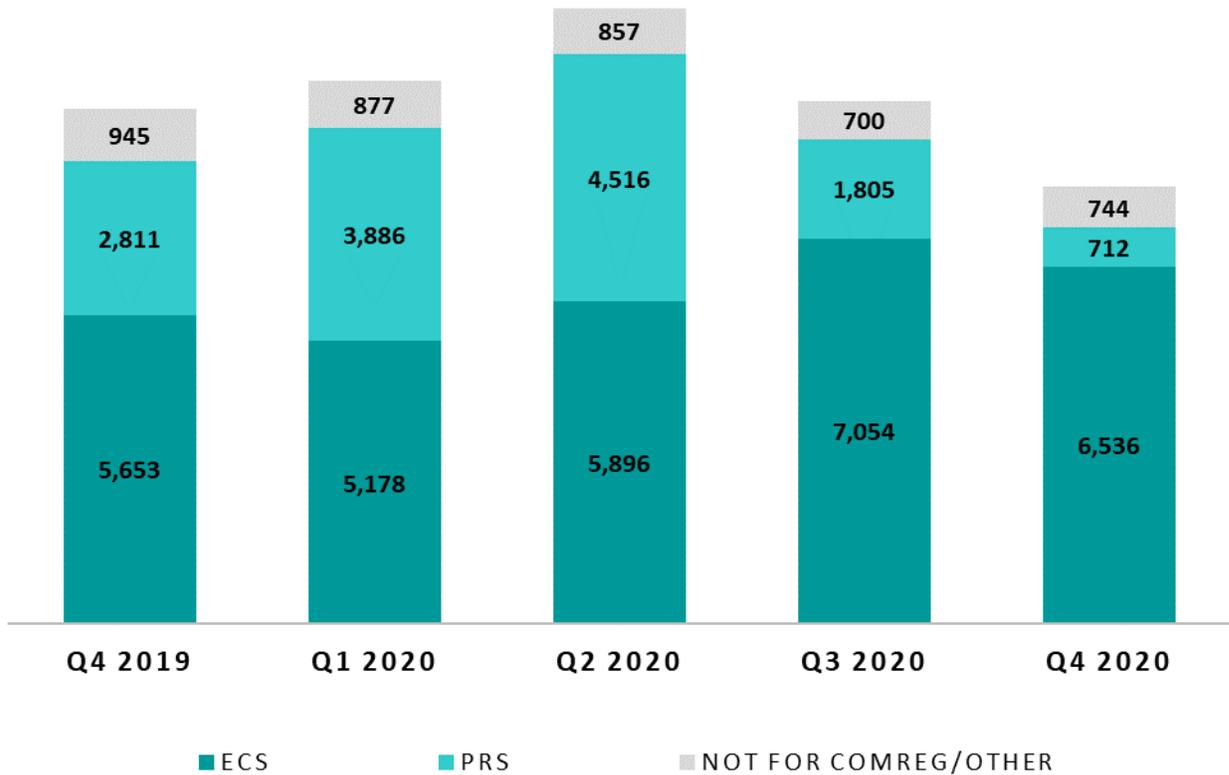


Figure 2: Number of issues recorded Q4 2019 – Q4 2020 by category

In Q4 2020, 82% of all issues recorded were in relation to ECS, while PRS and 'Not for ComReg/Other' issues each accounted for 9% of all other issues. Figure 3 below shows the split of these three category types.

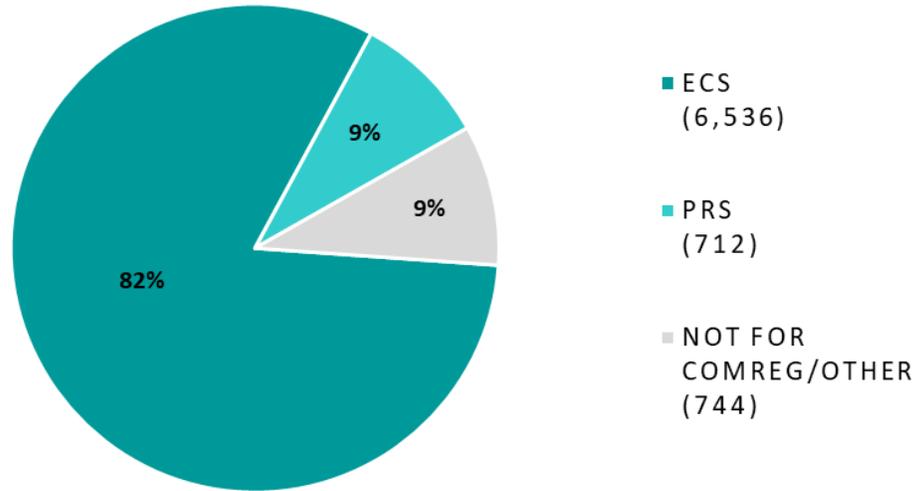


Figure 3: Split of all issues recorded in Q4 2020 by category

3.2 All Issues Recorded by Classification Type³

In Q4 2020, a total of 7,992 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 Q3 2020 to Q4 2020.

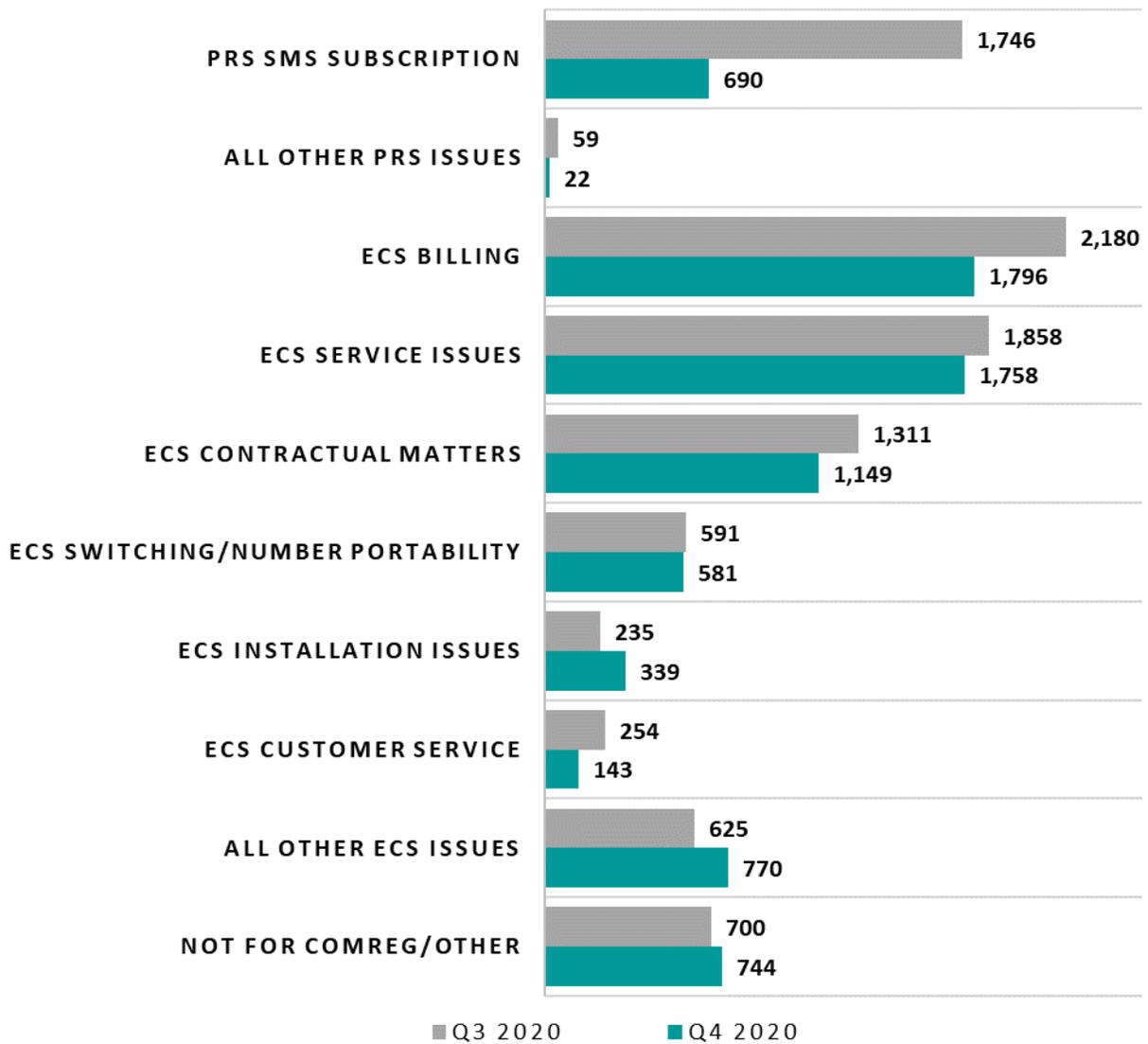


Figure 4: Number of issues recorded by classification type Q3 2020 vs Q4 2020

³ 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 Q4 2020, 78% of all issues recorded were queries, and 22% were complaints. Of the 6,232 queries recorded in Q4 2020, 78% were in relation to ECS and 10% were in relation to PRS. Of the 1,760 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 10 and Figure 21.

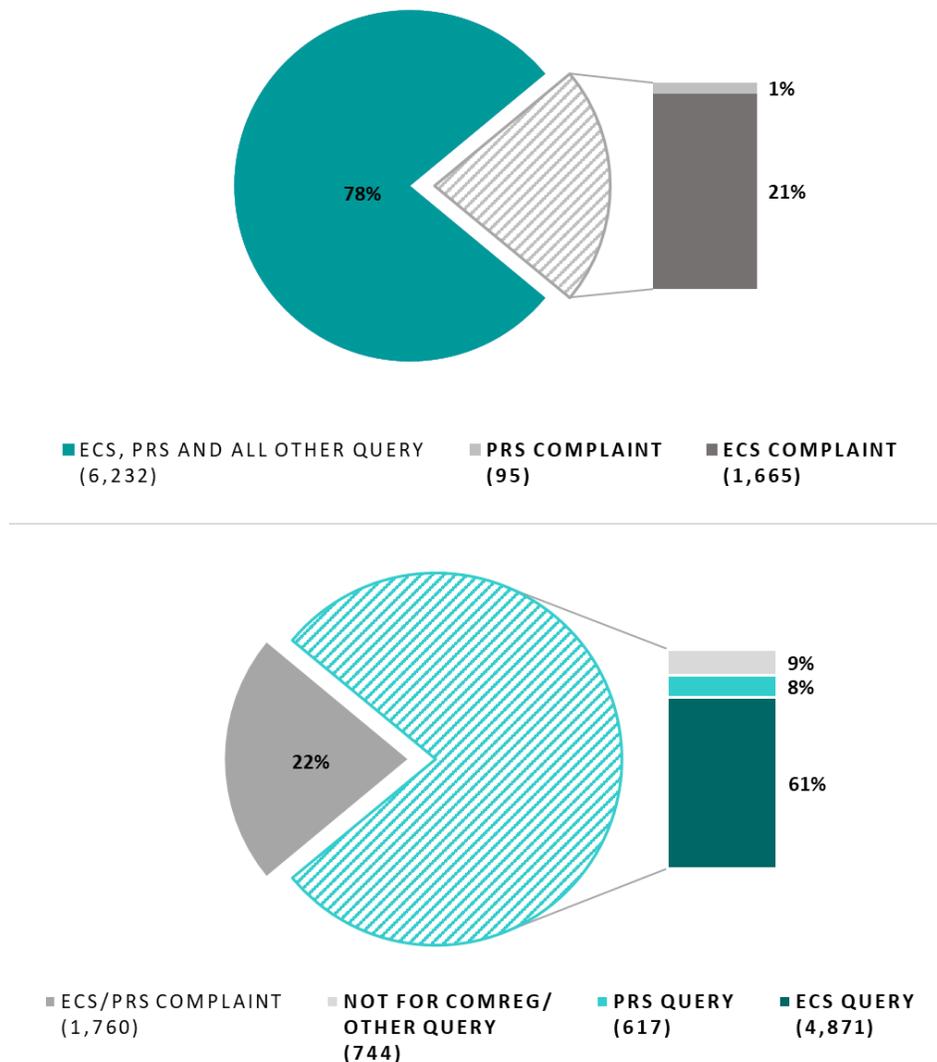


Figure 5: Split of issues recorded by issue type and category Q4 2020

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 Q4 2019 to Q4 2020. From Q4 2019 to Q4 2020, ECS queries increased by 5% and PRS queries decreased by 60%; ECS complaints increased by 62%, and PRS complaints decreased by 63%. 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.

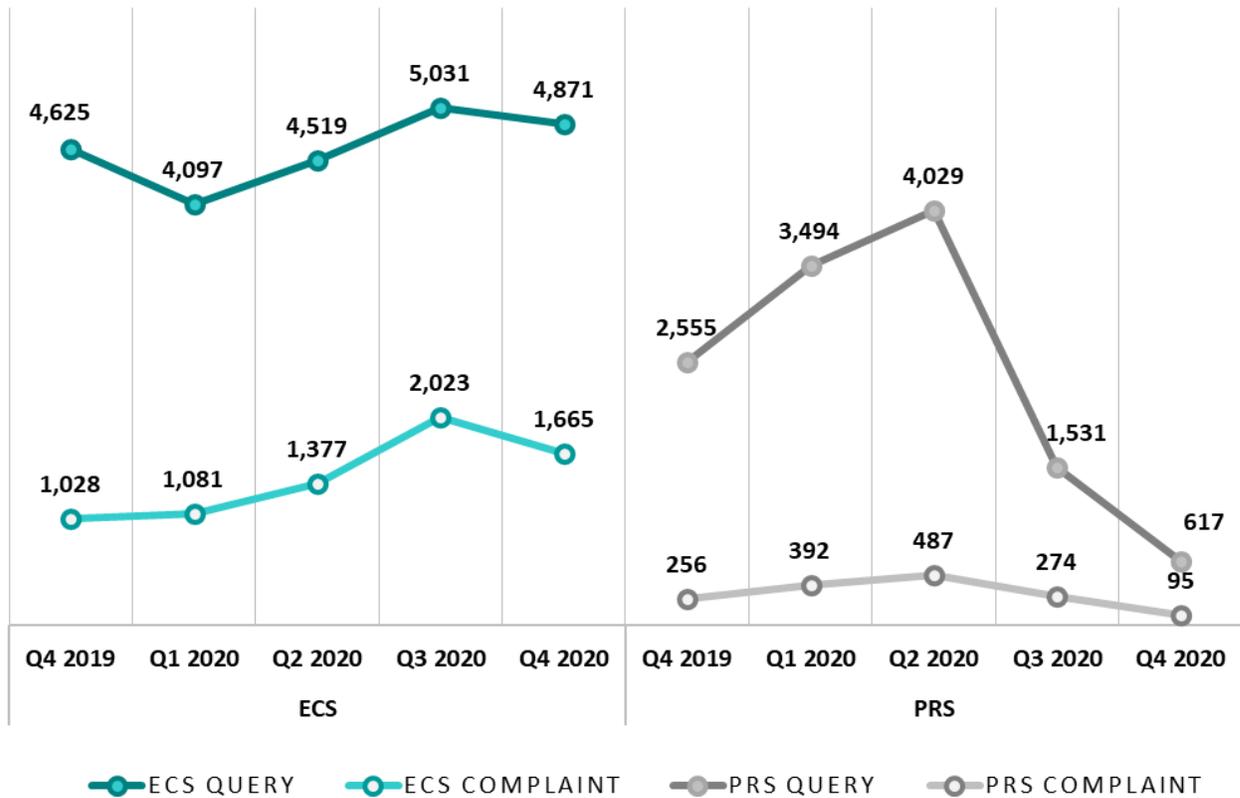


Figure 6: ECS and PRS complaints and queries recorded Q4 2019 – Q4 2020

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 Eir⁴, 3, Vodafone and ‘Other’ Mobile Service Providers⁵, comparing Q3 2020 to Q4 2020. The total number of issues recorded for Mobile Service Providers in Q4 2020 was 1,855, a 15% decrease compared to Q3 2020, where 2,188 issues were recorded.

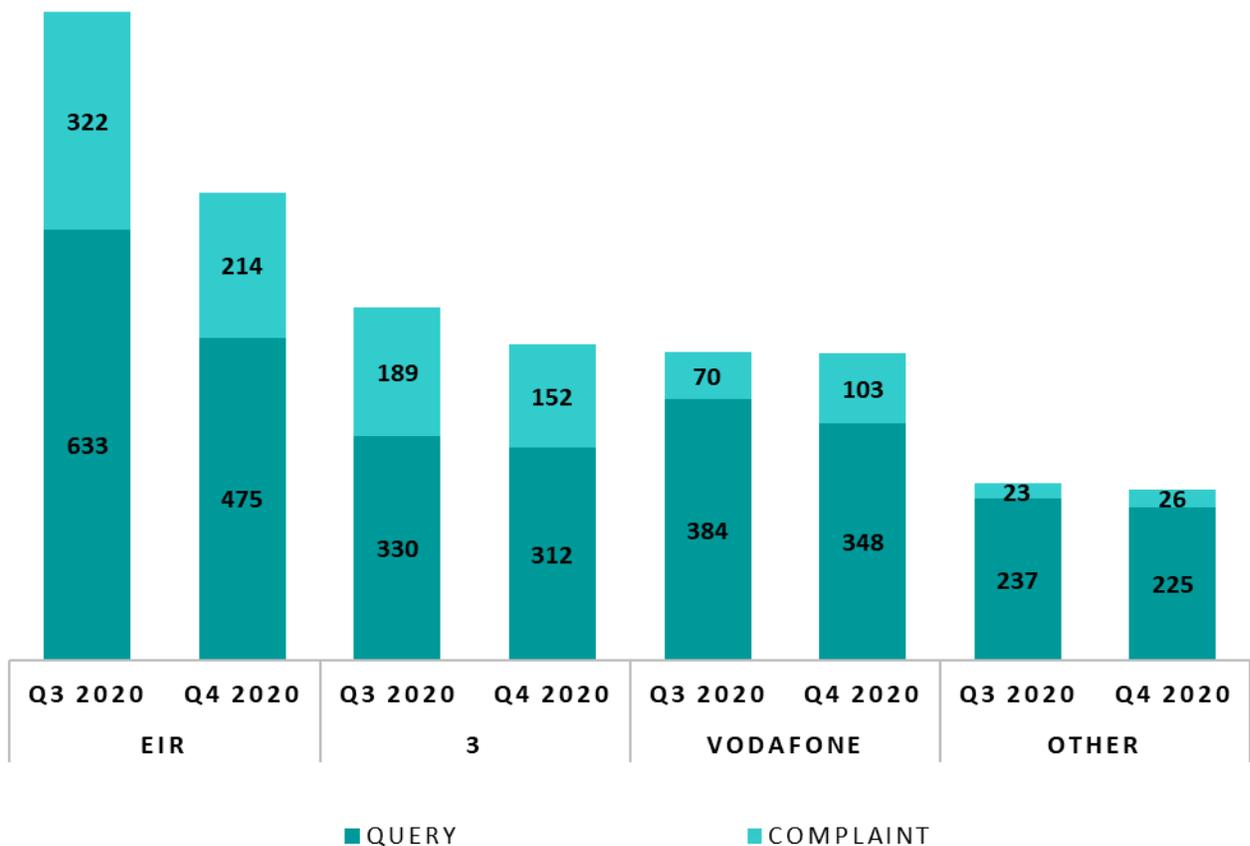


Figure 7: Number of ECS queries and complaints by Mobile Service Provider Q3 2020 vs Q4 2020

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

⁵ ‘Other’ Mobile Service Providers includes issues recorded for those Mobile Service Providers not named in Figure 7, 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 8 shows the split of queries to complaints recorded for each Mobile Service Provider⁴ in Figure 7, including the total industry average, comparing Q3 2020 to Q4 2020. The ‘industry average’ is based on all issues recorded within each quarter for all Mobile Service Providers.

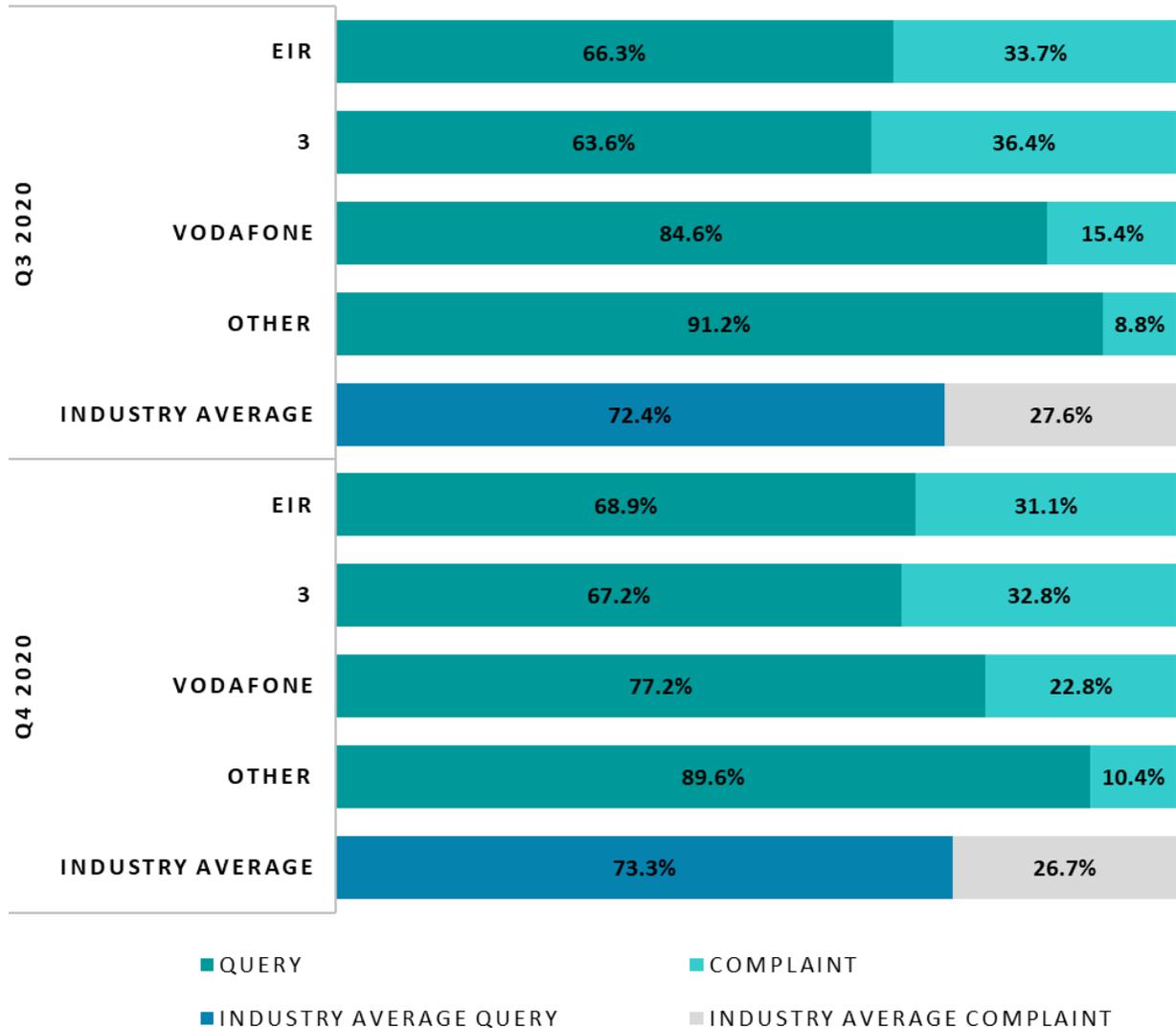
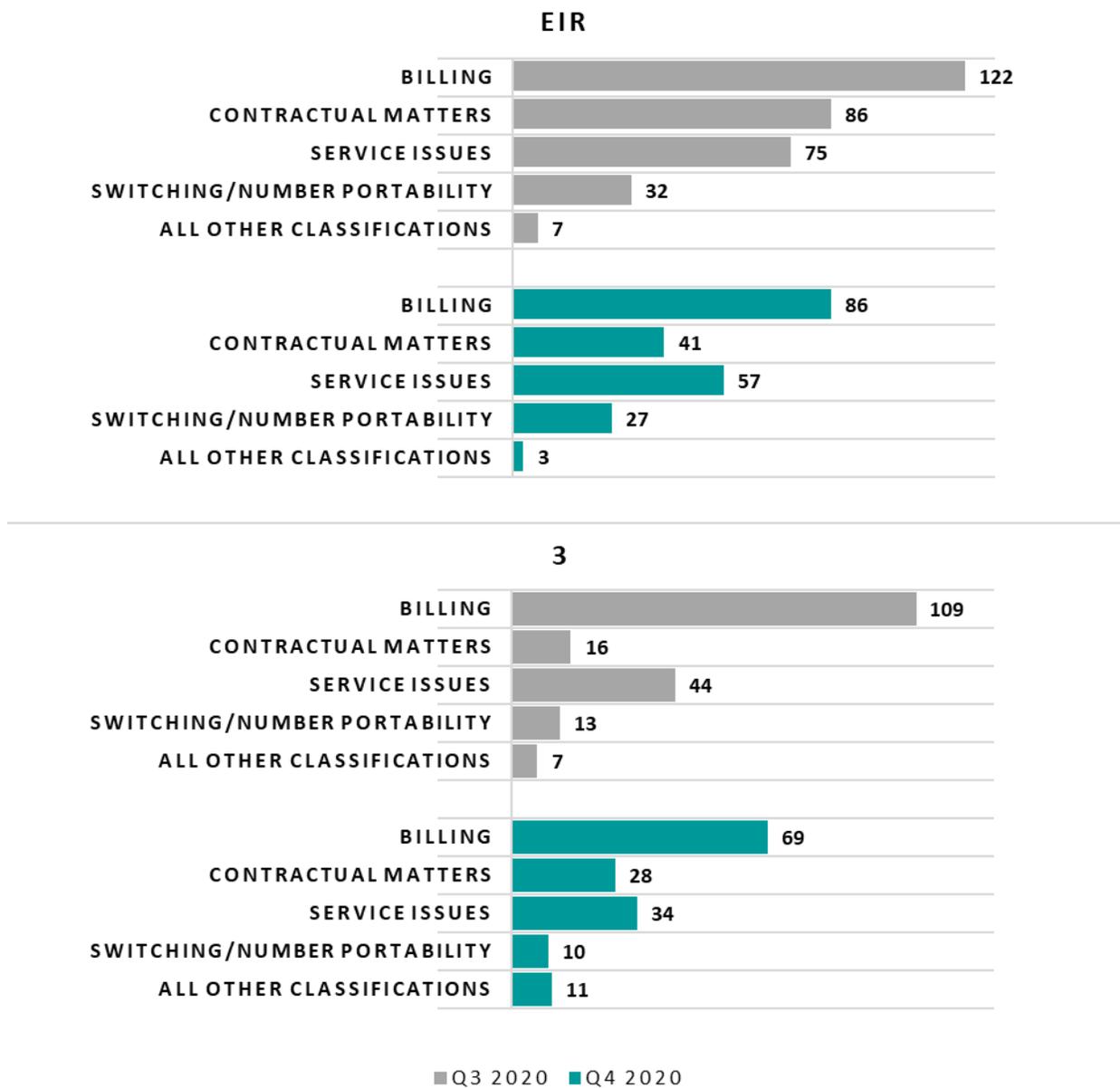


Figure 8: Split of ECS queries and complaints by Mobile Service Provider Q3 2020 vs Q4 2020

4.2 Mobile Service Provider ECS Complaints by Classification Type

Figure 9 shows ECS complaints by classification type for each Mobile Service Provider⁴ listed in Figure 7, comparing Q3 2020 with Q4 2020. For details of the highest number of issues recorded for each Mobile Service Provider, see Figure 10.



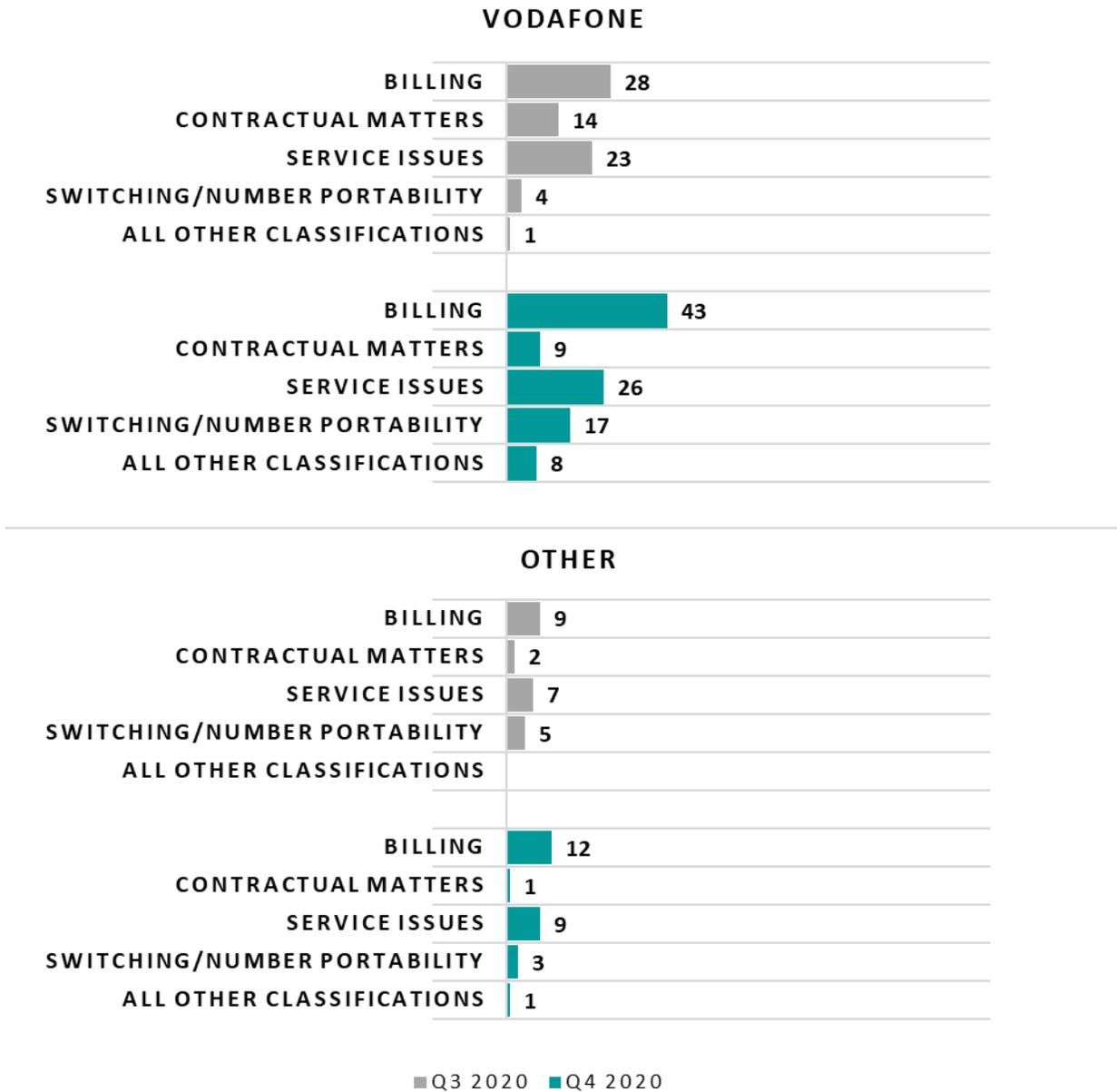


Figure 9: Mobile Service Provider ECS complaints by classification type Q3 2020 vs Q4 2020

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 Q3 2020 to Q4 2020.

	Number of Issues Q3 2020	Number of Issues Q4 2020
Eir⁴		
Billed more than agreed amount	110	80
Loss of service	87	63
Refund not received	44	48
Contract termination issues - cancellation procedures	79	47
Billed after cancellation	59	45
Mobile coverage	80	44
Switching/number portability - unlock code issue	37	36
Equipment issues - handset		31
Contract termination issues - cancellation not accepted	43	29
Switching/number portability - delay switching	35	28
3		
Billed more than agreed amount	91	60
Refund not received	37	35
Mobile coverage	42	33
Switching/number portability - unlock code issue	25	27
Billed after cancellation	30	25
Equipment issues - handset		23
Net neutrality - broadband speeds received		22
Loss of service	35	20
Service issues - intermittent service	20	17
Contract termination issues - cancellation not accepted		17

Vodafone		
Billed more than agreed amount	59	64
Switching/number portability - unlock code issue	33	50
Loss of service	26	42
Mobile coverage	43	30
Billed after cancellation	24	27
Equipment issues - handset	21	24
Refund not received		18
Switching/number portability - delay switching		15
Misleading sales	23	14
Contract termination issues - cancellation procedures	15	12

Figure 10: Highest number of issues recorded by Mobile Service Provider Q3 2020 vs Q4 2020

4.4 Mobile Service Provider ECS Complaints Closed in Q4 2020

Figure 11 shows the number of ECS complaints closed in Q4 2020, for each Mobile Service Provider⁴ listed in Figure 7, broken down by number of working days open (Monday to Friday, and excluding public holidays). Complaints closed within Q4 2020 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

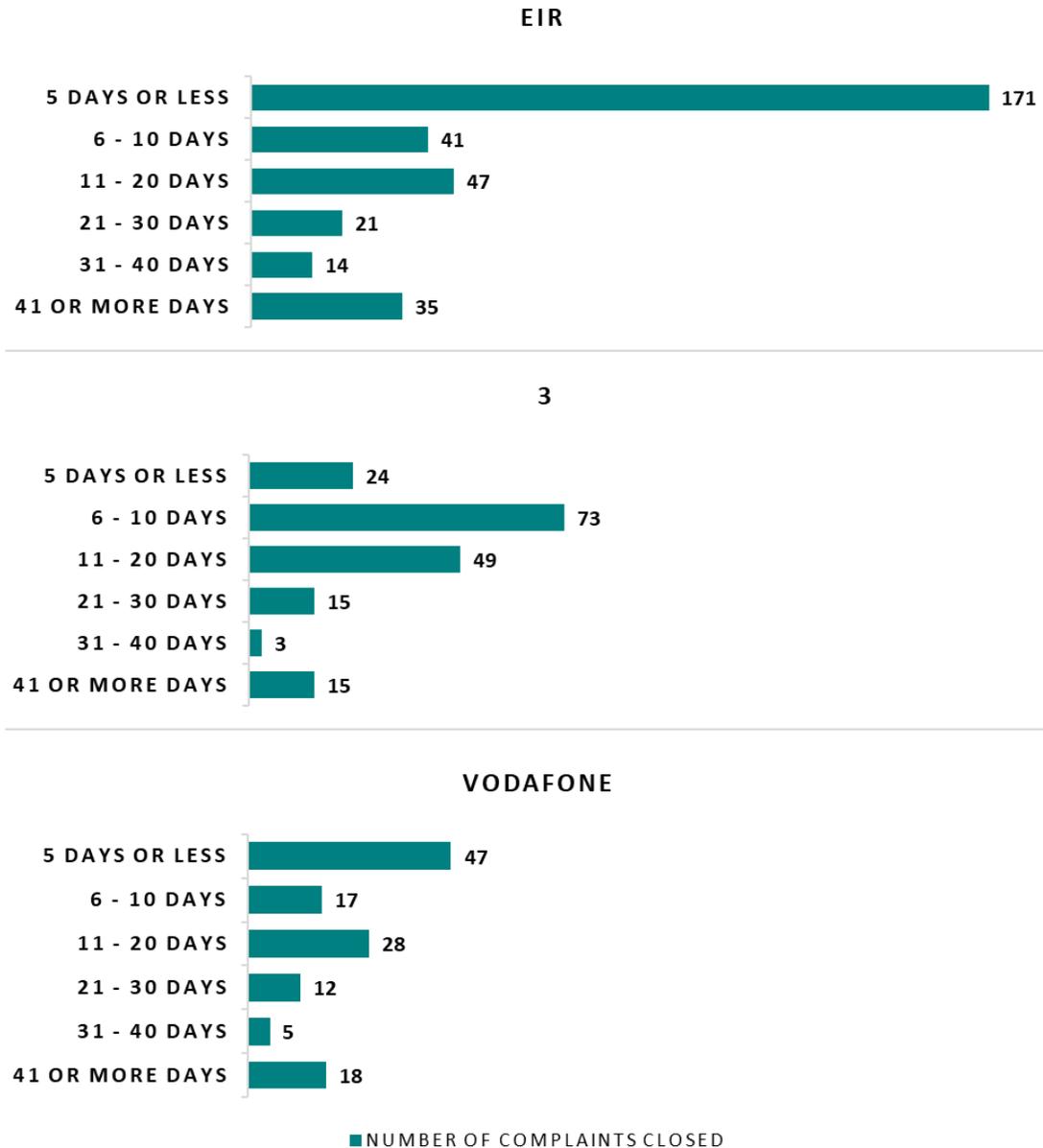


Figure 11: ECS complaints closed in Q4 2020 by Mobile Service Provider and number of working days open

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 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 Q3 2020⁶ to Q4 2020. Complaints closed within Q4 2020 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 October 2020. The ‘industry median’ is a ‘snapshot’ based on all complaints closed within each quarter for all Mobile Service Providers.

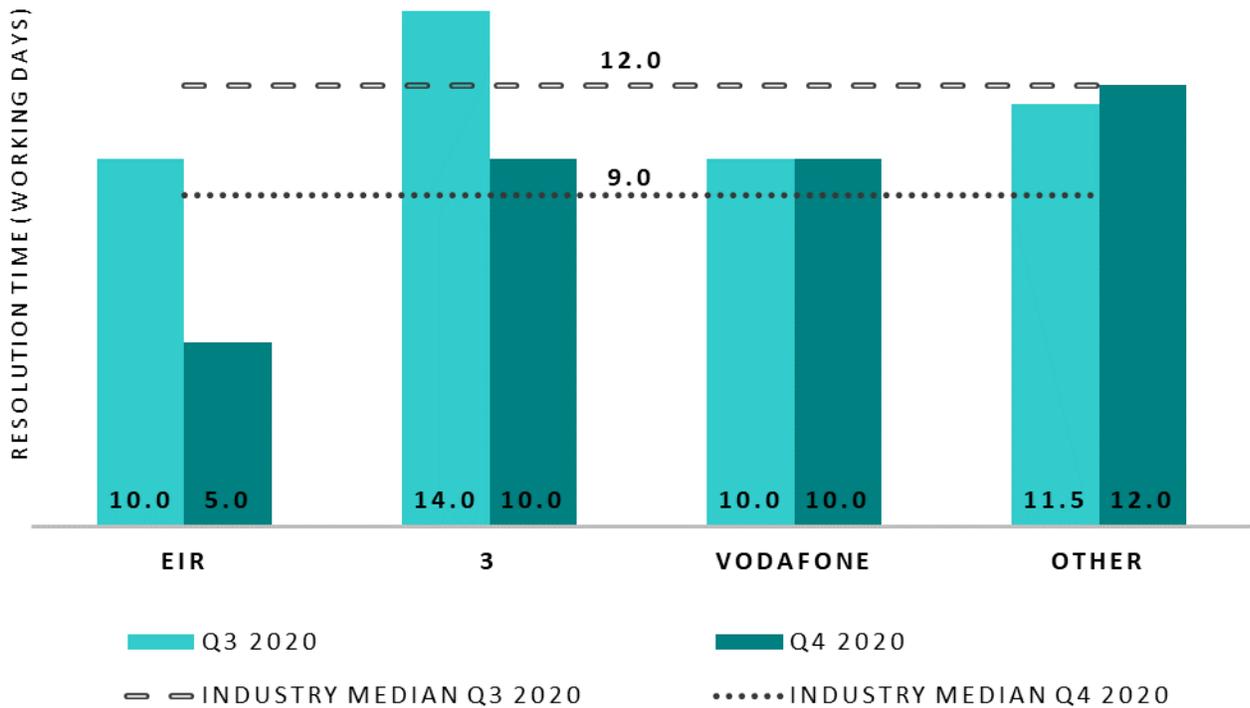


Figure 12: Median complaint resolution time by Mobile Service Provider Q3 2020 vs Q4 2020

⁶ For details of complaints closed in Q3 2020, see ComReg Consumer Line Statistics Report Q3 2020.

Figure 13 provides a further breakdown of the Q4 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.

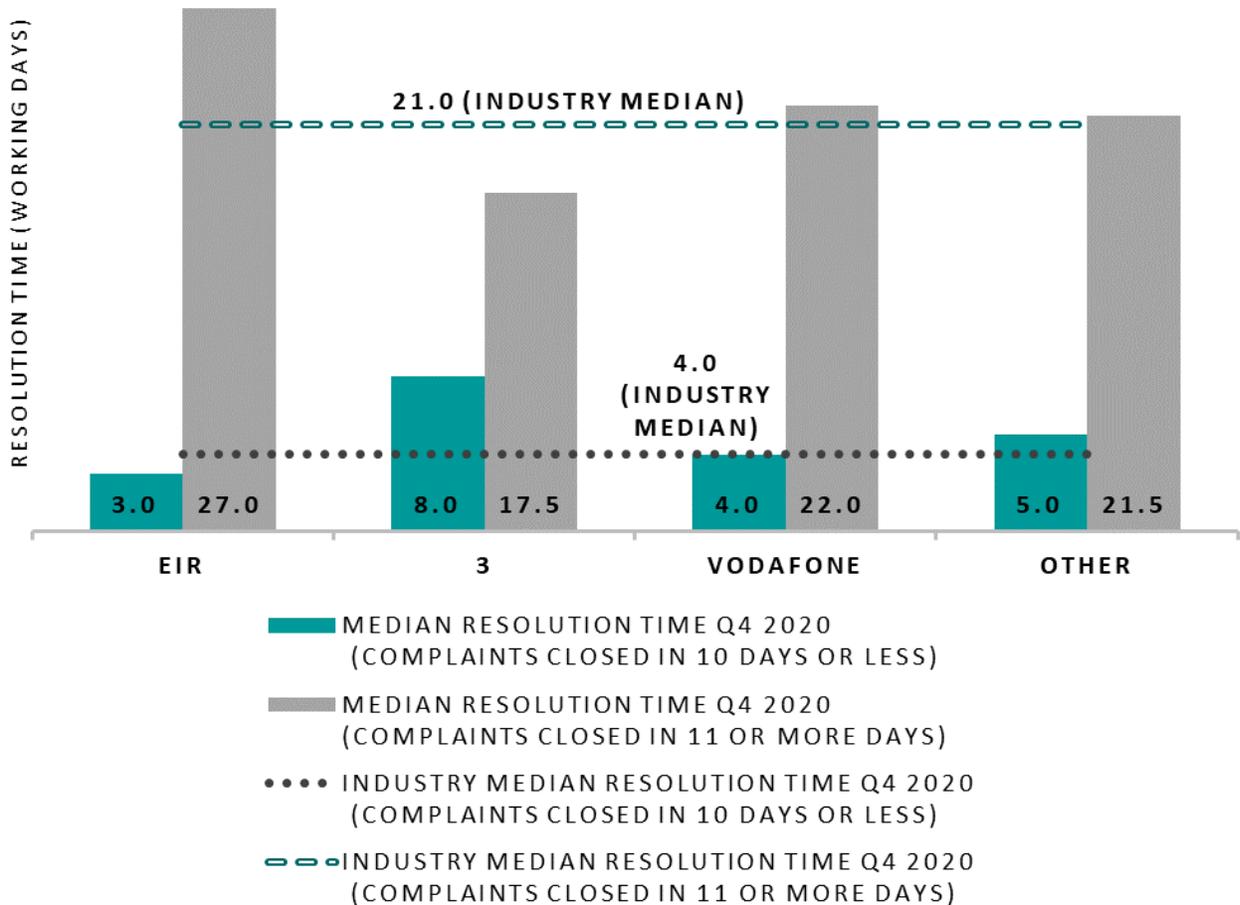


Figure 13: Median complaint resolution time by Mobile Service Provider Q4 2020, complaints closed in 10 days or less vs complaints closed in 11 days or more

4.5 Mobile Service Provider ECS Complaints Open at 31 December 2020

Figure 14 shows the number ECS complaints open at 31 December 2020, for each Mobile Service Provider⁴ listed in Figure 7, broken down by the number of working days elapsed since they were first escalated to the Service Provider.

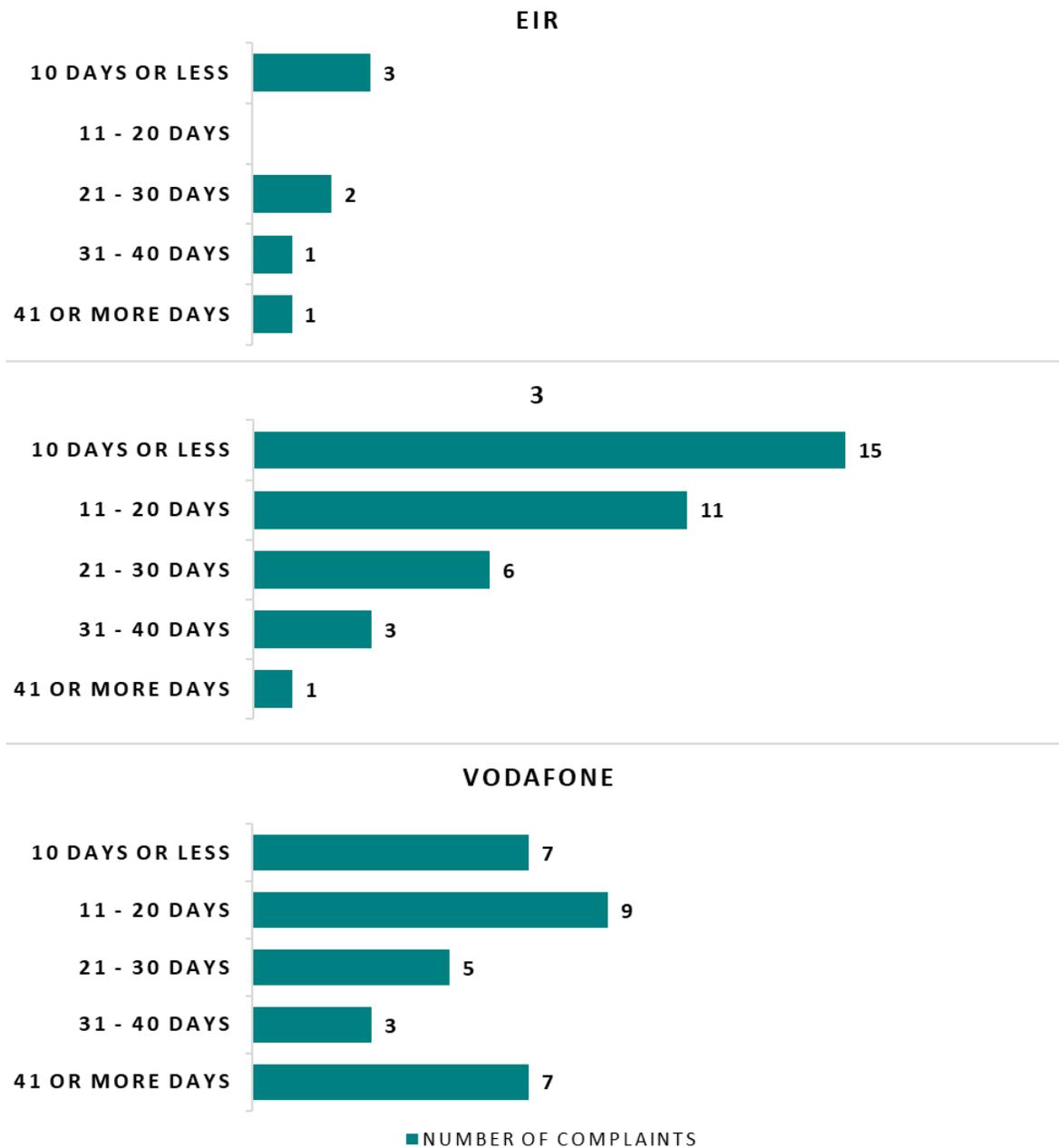


Figure 14: Mobile Service Provider ECS complaints open at 31 December 2020 by number of working days since first escalation

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 Provider⁴ listed in Figure 7 and the total industry average, comparing Q3 2020 to Q4 2020. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Mobile Service Providers.

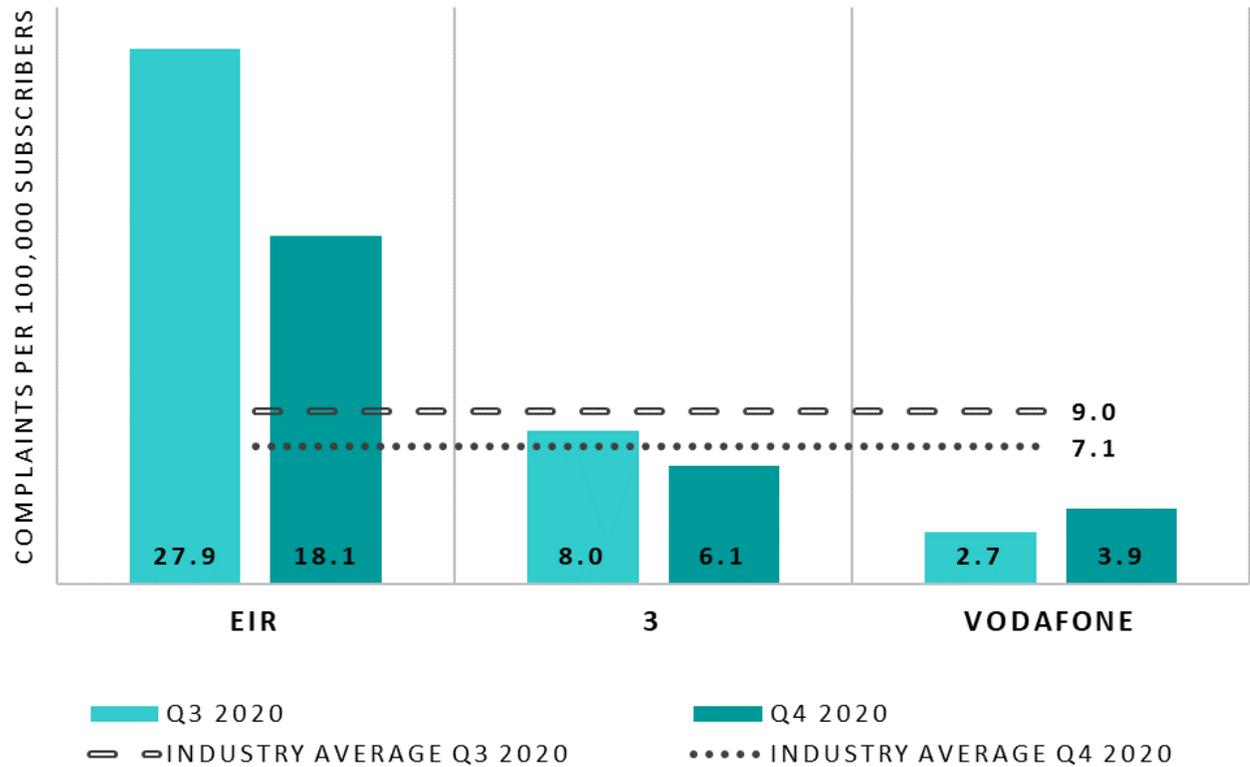


Figure 15: ECS complaints per 100,000 subscribers by Mobile Service Provider Q3 2020 vs Q4 2020

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 Q4 2020 split by short code and premium rate service provider⁷ (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).

Network Operator	Short Code and Premium Rate Service Provider			Total
	57976 (txtNation Ltd)	57977 (txtNation Ltd)	Other	
Eir	163	60	106	329
Tesco Mobile Ireland	40	13	25	78
3	38	28	50	116
Virgin Media	29	8	9	46
Other	55	27	61	143
Total	325	136	251	712

Figure 16: Number of PRS issues recorded by PRS short code, premium rate service provider and Mobile Service Provider Q4 2020

⁷ <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 17 shows the average number of PRS issues recorded (rounded to the nearest whole number) per 100,000 subscribers for each Mobile Service Provider⁴ listed in Figure 16 and the total industry average, comparing Q3 2020 to Q4 2020. The ‘industry average’ is based on all PRS issues recorded for all Mobile Service Providers within each quarter.

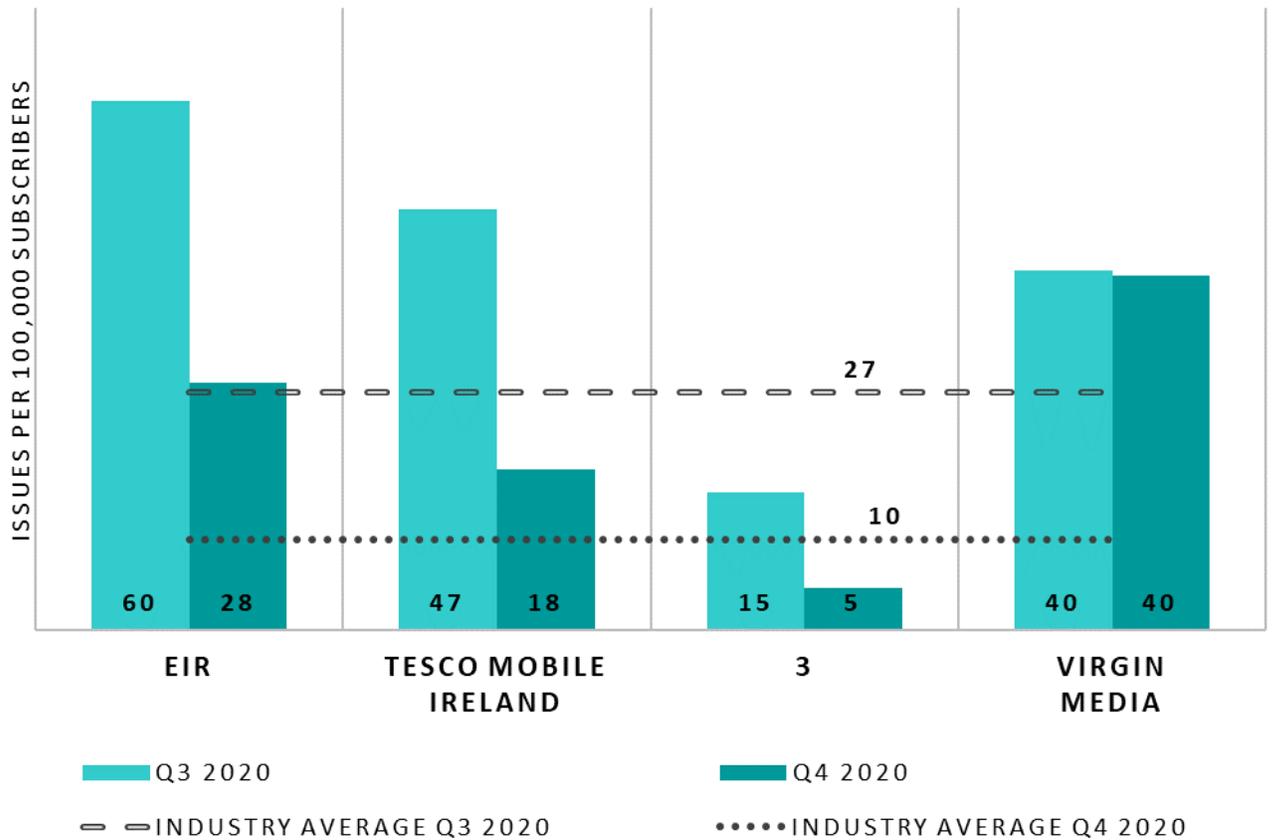


Figure 17: PRS issues by ECS Provider per 100,000 subscribers Q3 2020 vs Q4 2020

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, Imagine¹, Sky Ireland Limited, Virgin Media, Vodafone, and all 'Other'⁸ Fixed Service Providers, comparing Q3 2020⁹ to Q4 2020. The total number of issues recorded for Fixed Service Providers in Q4 2020 was 4,681, a 4% decrease compared to Q3 2020, where 4,866 issues were recorded.

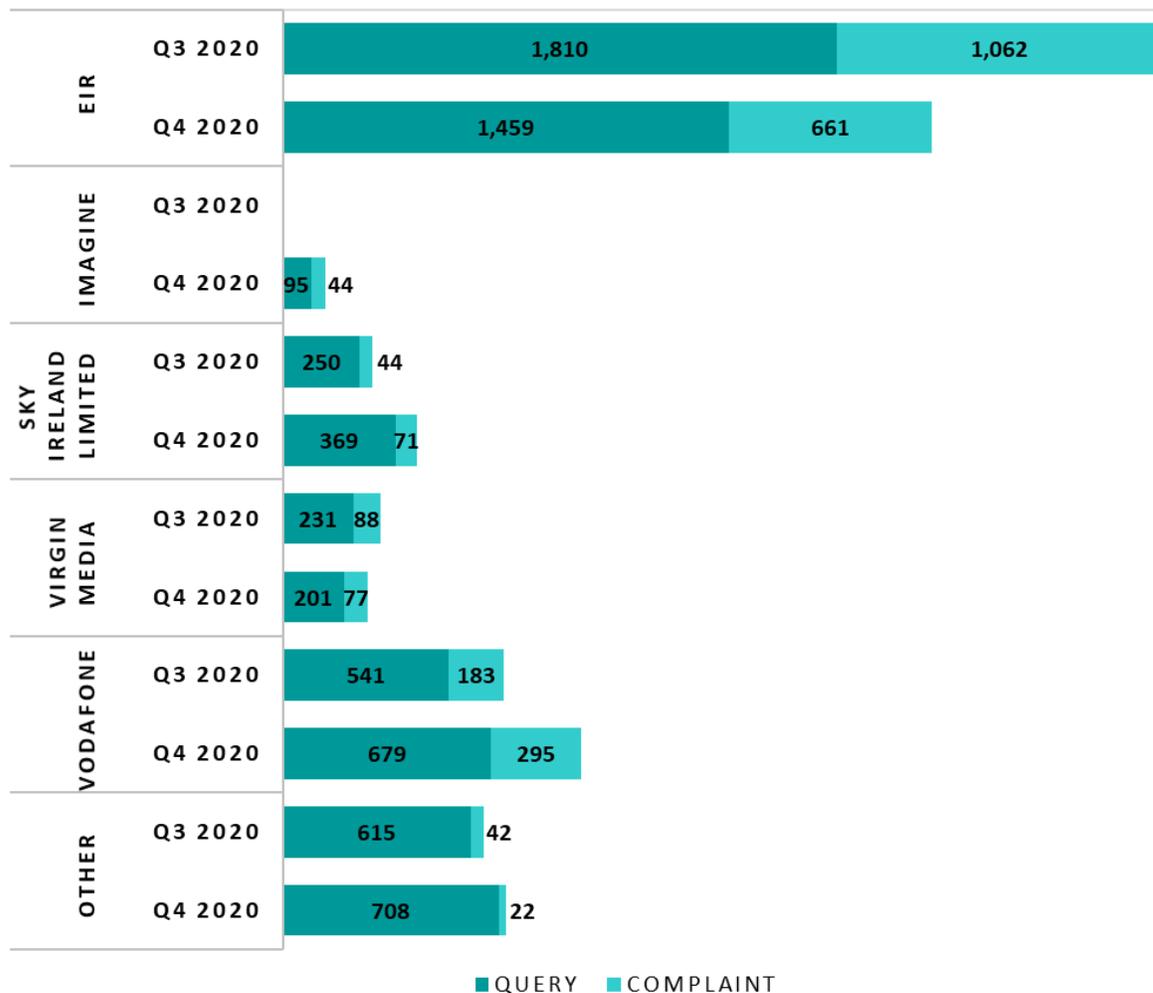


Figure 18: Number of ECS issues queries and complaints by Fixed Service Provider Q3 2020 vs Q4 2020

⁸ 'Other' Fixed Service Providers includes issues recorded for those Fixed Service Providers not named in Figure 18, 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.

⁹ On this chart, issues recorded for Imagine are included in 'Other' figures for Q3 2020.

Figure 19 shows the split of queries to complaints recorded for Eir, Imagine⁹, Sky Ireland Limited, Virgin Media and Vodafone, including the total industry average comparing Q3 2020 to Q4 2020. The 'industry average' is based on all issues recorded within each quarter for all Fixed Service Providers.

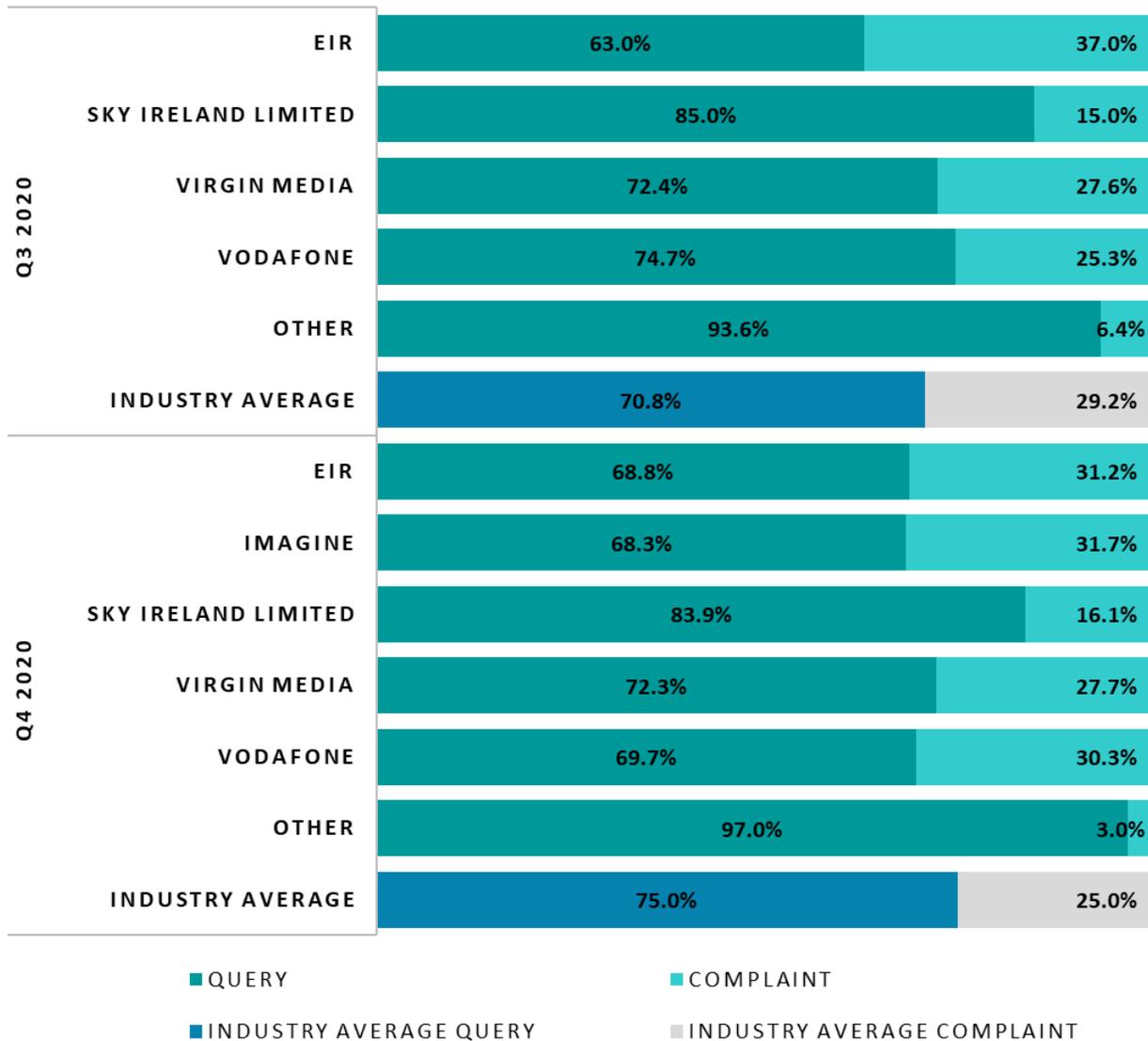
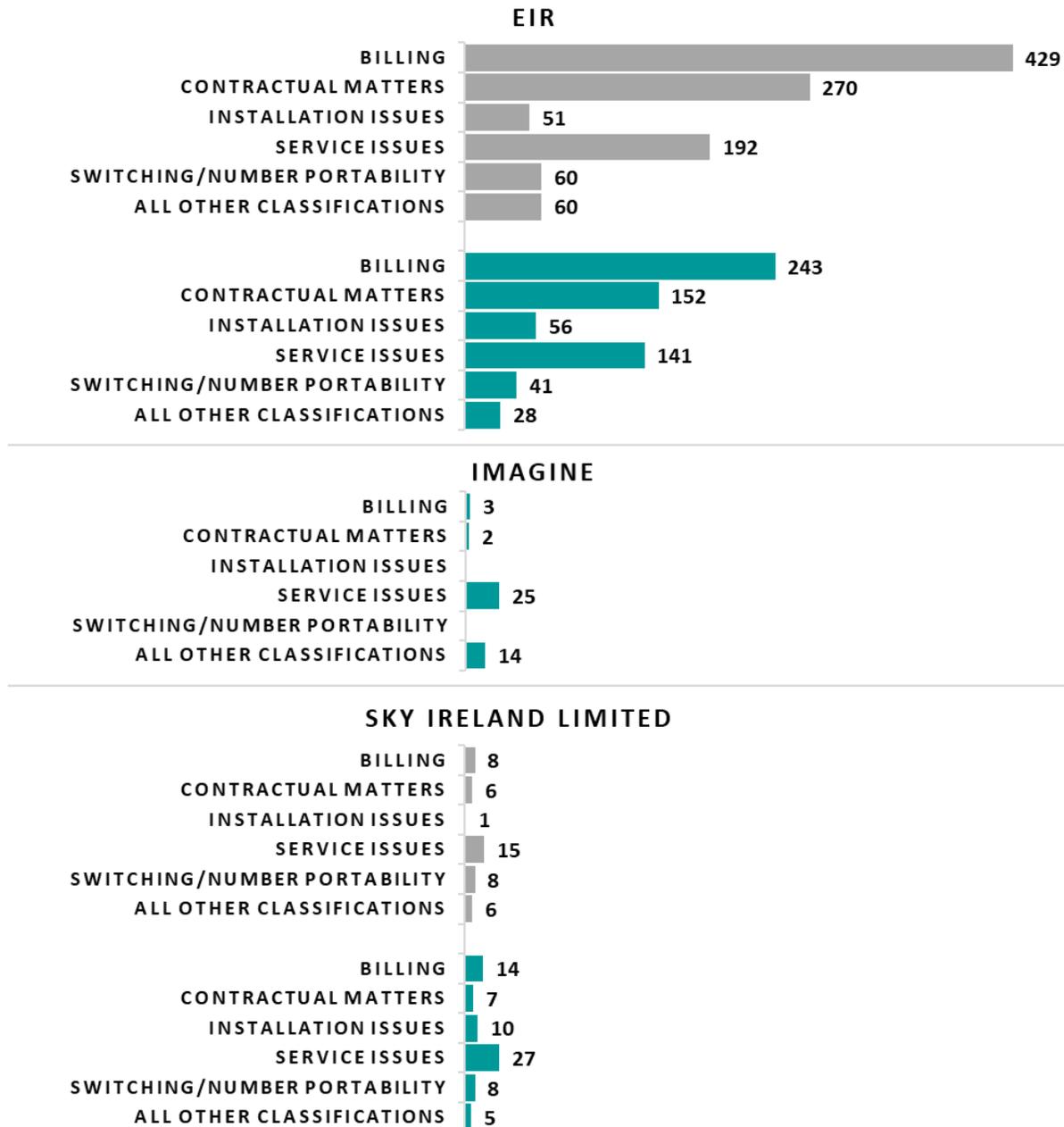


Figure 19: Split of ECS queries and complaints by Fixed Service Provider Q3 2020 vs Q4 2020

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 Q3 2020⁹ with Q4 2020. For details of the highest number of issues recorded for each Fixed Service Provider, see Figure 21.



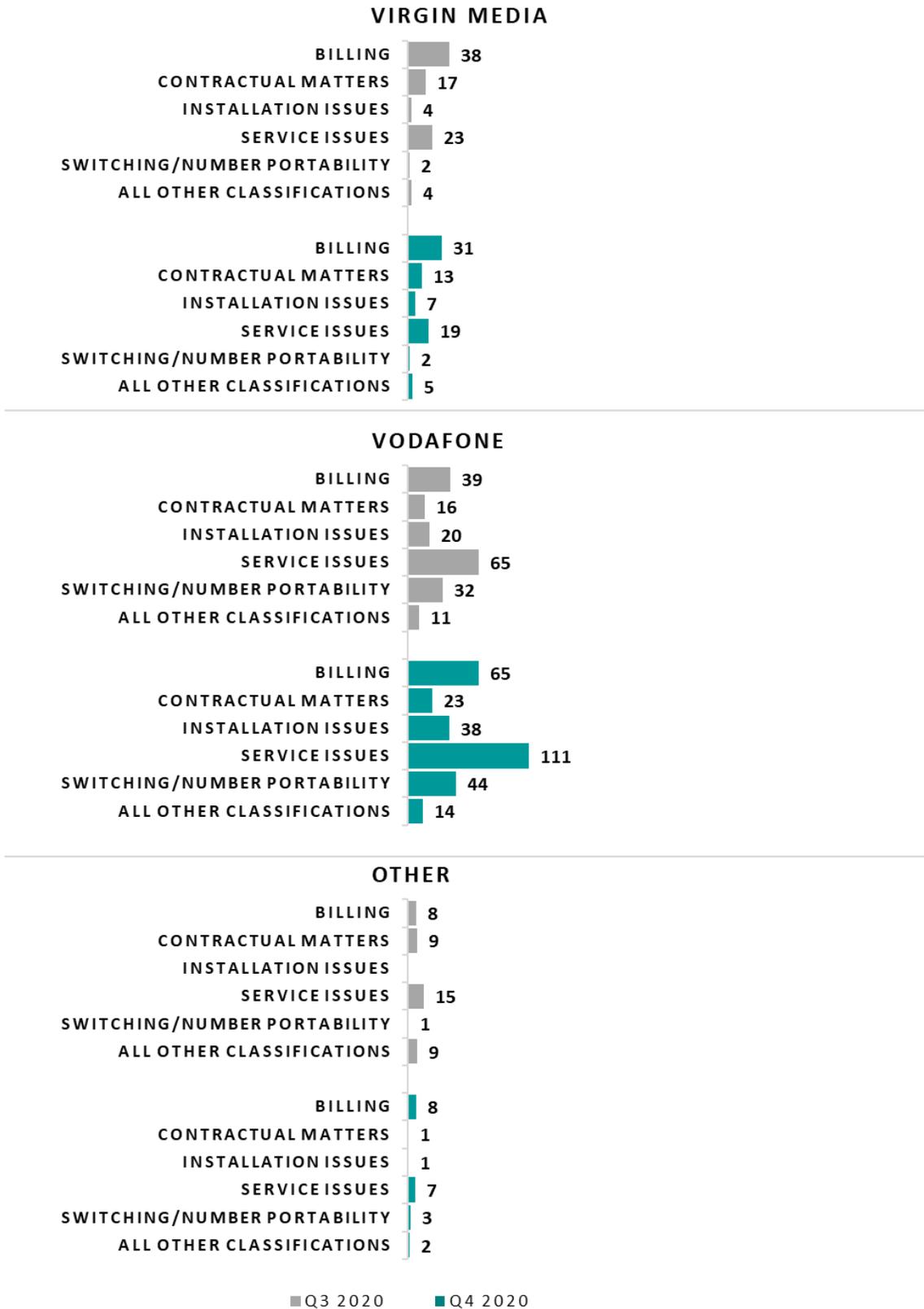


Figure 20: Fixed Service Provider ECS complaints by classification type Q3 2020 vs Q4 2020

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 Q3 2020 to Q4 2020.

	Number of Issues Q3 2020	Number of Issues Q4 2020
Eir		
Billed more than agreed amount	359	196
Loss of service	331	259
Contract termination issues - cancellation procedures	331	244
Billed after cancellation	304	228
Contract termination issues - cancellation not accepted	156	162
Service issues - intermittent service	132	117
Service availability		108
Delay in installation	104	104
Refund not received	85	83
Net neutrality - broadband speeds received		71
Imagine¹		
Service issues - intermittent service		46
Net neutrality - broadband speeds received		42
Loss of service		13
Billed more than agreed amount		7
Service availability		4
Terms & conditions - unlimited/fair usage		4
Contract termination issues - cancellation not accepted		3
Billed after cancellation		3
Contractual matters - pricing transparency		2
Accessing complaints process - issue lodging formal complaint		2

Sky Ireland Limited		
Loss of service	44	72
Billed more than agreed amount	28	44
Service issues - intermittent service	20	35
Contract termination issues - cancellation procedures	22	31
Billed after cancellation	26	29
Delay in installation	11	27
Service availability		20
Switching/number portability - UAN/CRN issue	13	19
Net neutrality - broadband speeds received	20	17
Contract termination issues - cancellation not accepted	8	17
Virgin Media		
Billed more than agreed amount	56	46
Contract termination issues - cancellation procedures	29	23
Service issues - intermittent service	22	23
Loss of service	27	20
Billed after cancellation	25	18
Delay in installation	10	11
Contract termination issues - cancellation not accepted	10	10
Billed for service not requested		9
Terms & conditions - cancellation penalties		8
Service availability		8
Vodafone		
Loss of service	138	204
Delay in installation	49	90
Service issues - intermittent service	53	83
Billed after cancellation	70	76
Billed more than agreed amount	46	57
Net neutrality - broadband speeds received	39	51
Switching/number portability - number loss	40	48
Switching/number portability - delay switching	29	42
Switching/number portability - UAN/CRN issue	46	35
Contract termination issues - cancellation not accepted	22	32

Figure 21: Highest number of issues recorded by Fixed Service Provider Q3 2020 vs Q4 2020

5.4 Fixed Service Provider ECS Complaints Closed in Q4 2020

Figure 22 below shows ECS complaints closed in Q4 2020, for each Fixed Service Provider listed in Figure 18, broken down by number of working days. Complaints closed within Q4 2020 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

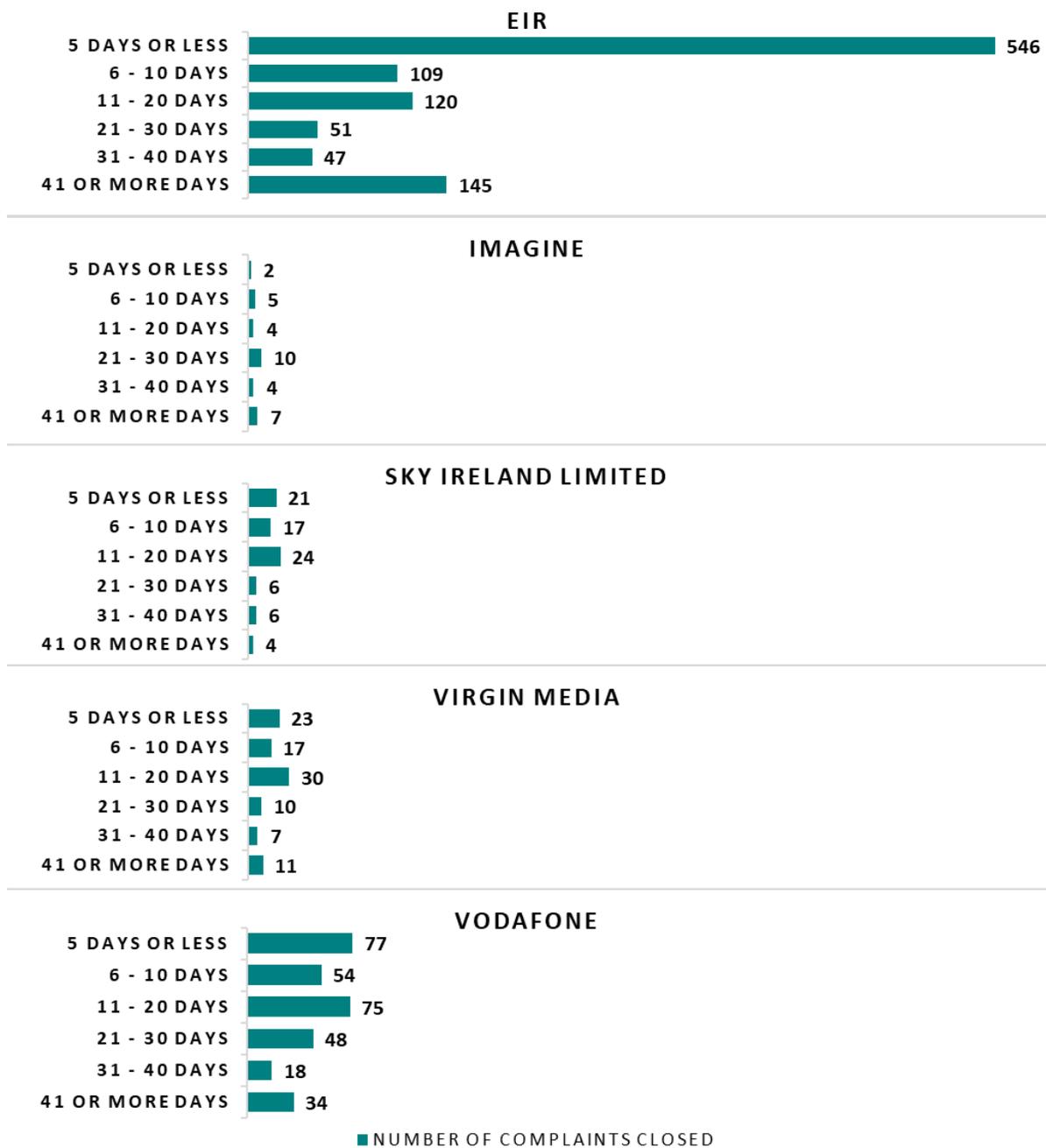


Figure 22: Fixed Service Provider ECS complaints closed in Q4 2020 by number of working days open

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 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 Q3 2020⁹ to Q4 2020. Complaints closed within Q4 2020 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 October 2020. The ‘industry median’ is a ‘snapshot’ based on all complaints closed within each quarter for all Fixed Service Providers.

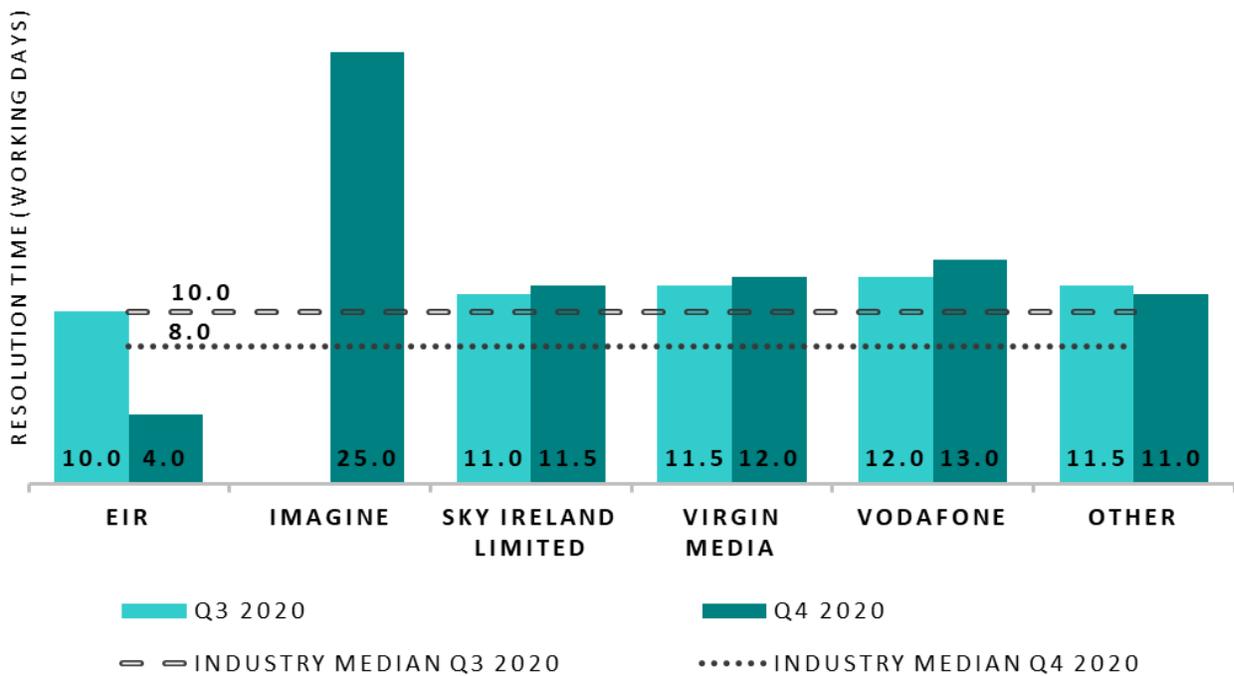


Figure 23: Median complaint resolution time by Fixed Service Provider Q3 2020 vs Q4 2020

Figure 24 provides a further breakdown of the Q4 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.

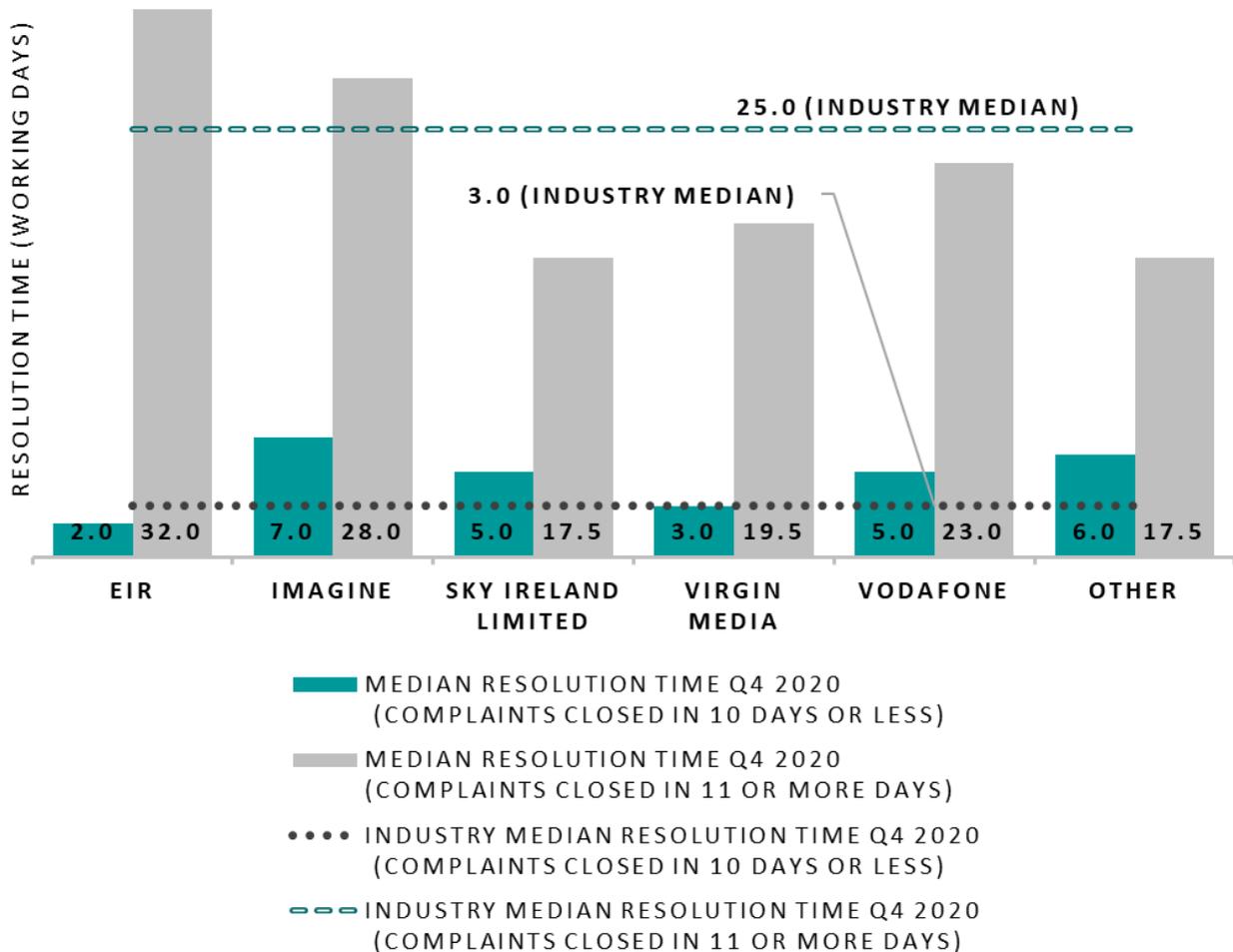


Figure 24: Median complaint resolution time by Fixed Service Provider Q4 2020, complaints closed in 10 days or less versus complaints closed in 11 days or more

5.5 Fixed Service Provider ECS Complaints Open at 31 December 2020

Figure 25 shows the number of ECS complaints open at 31 December 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.

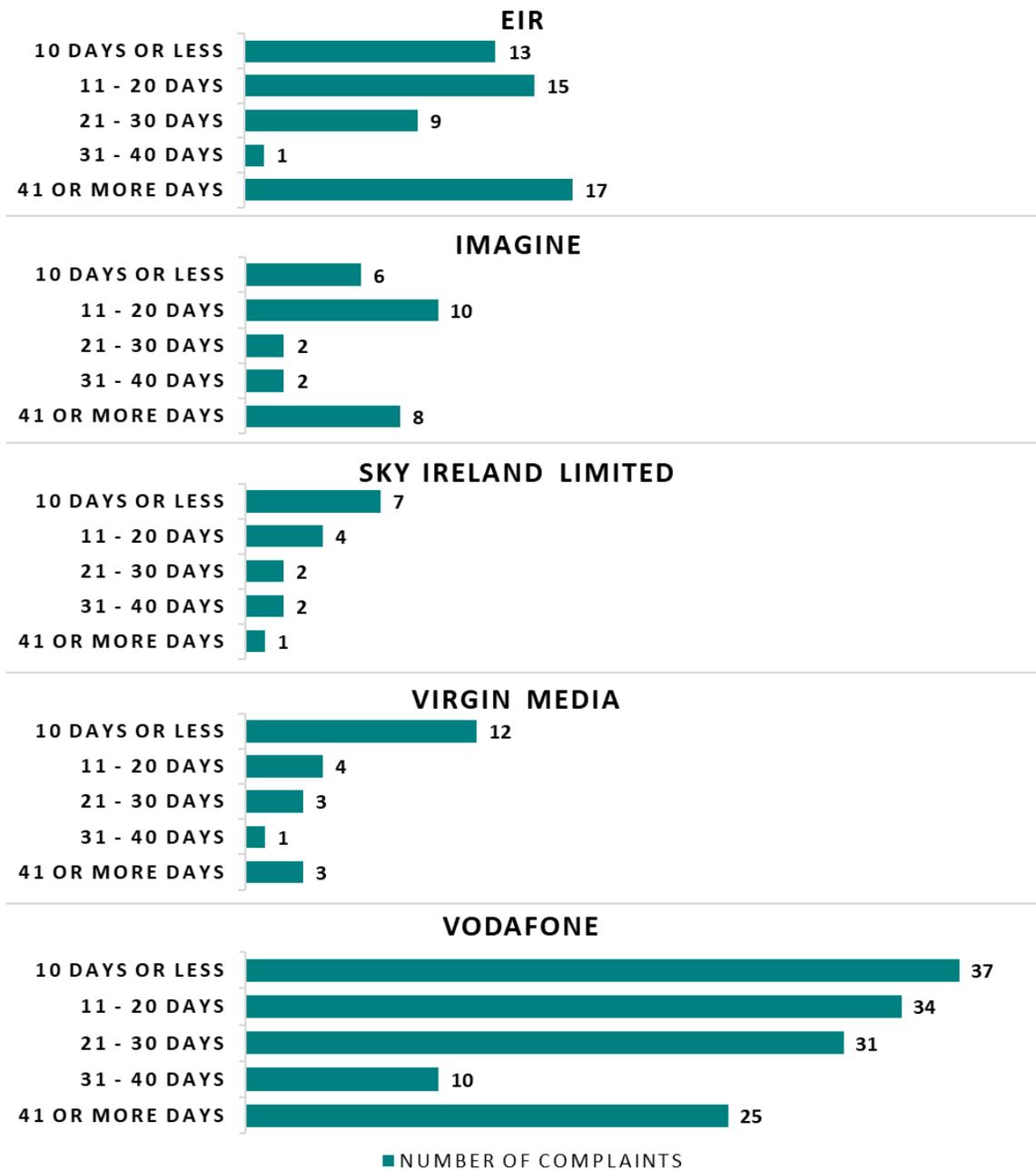


Figure 25: Fixed Service Provider ECS complaints open at 31 December 2020 by number of working days since first escalation

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 18¹⁰ and the total industry average, comparing Q3 2020 to Q4 2020. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Fixed Service Providers.

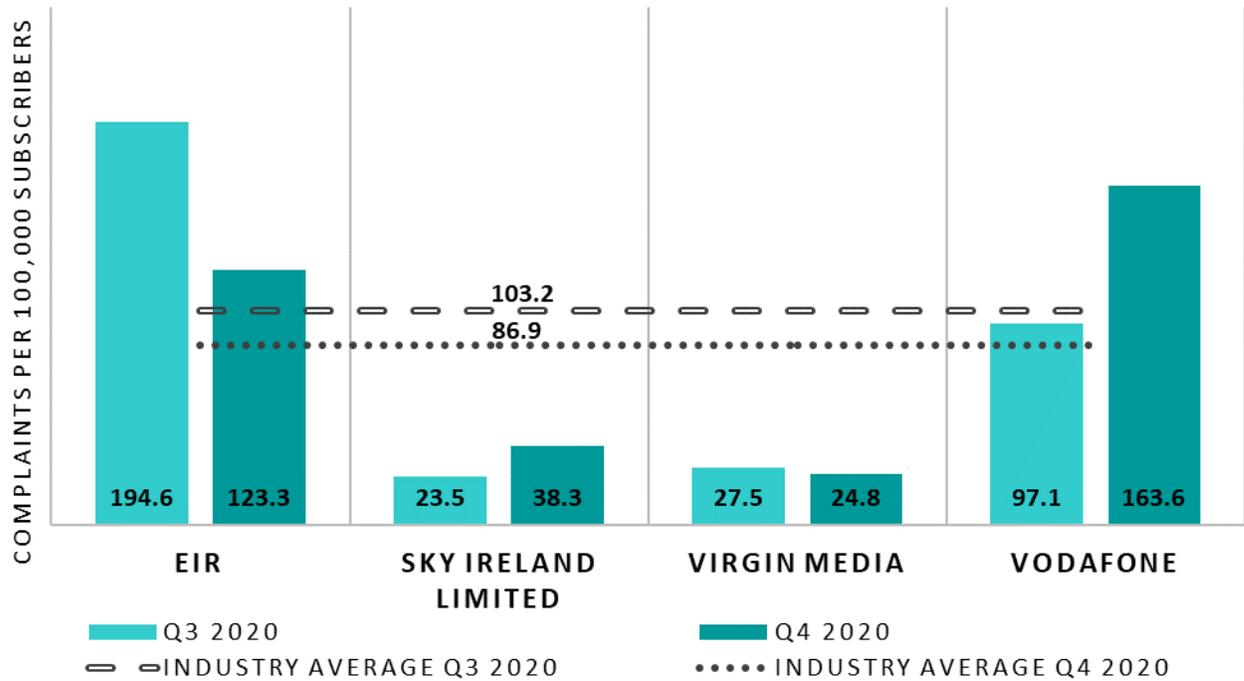


Figure 26: ECS complaints by Fixed Service Provider per 100,000 subscribers Q3 2020 vs Q4 2020

¹⁰ Where subscriber data for the Fixed Service Provider is publicly available.

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 Provider⁴ listed in Figure 7, comparing Q3 2020 to Q4 2020.

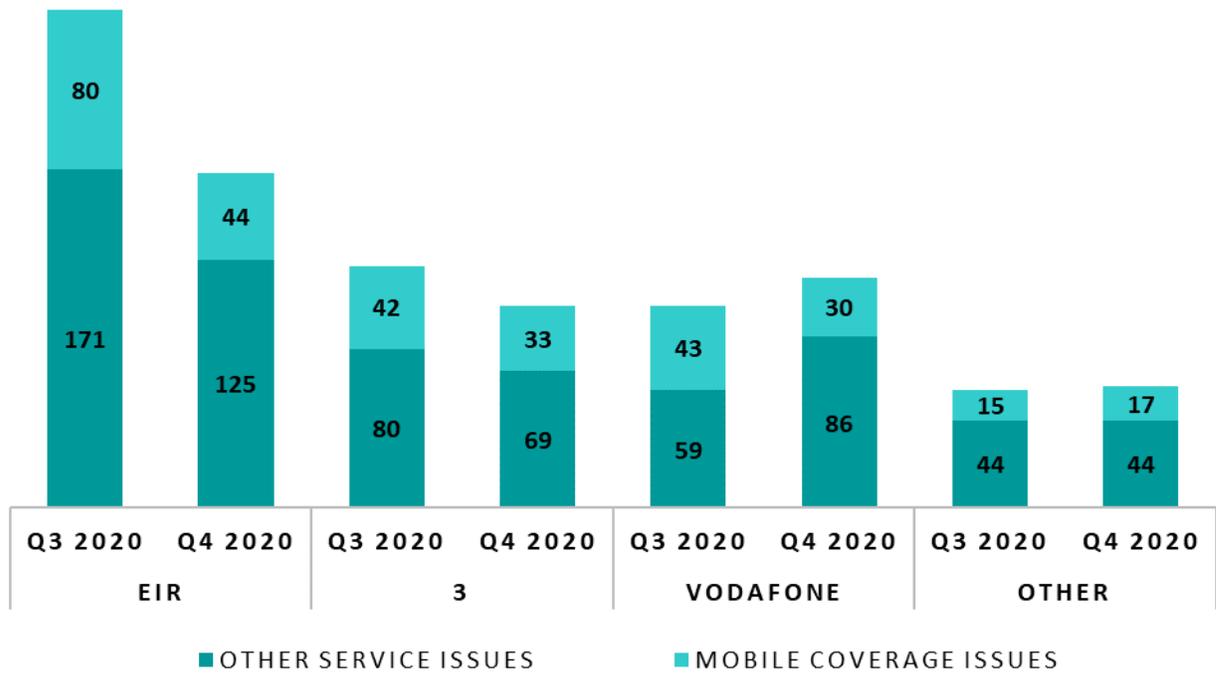
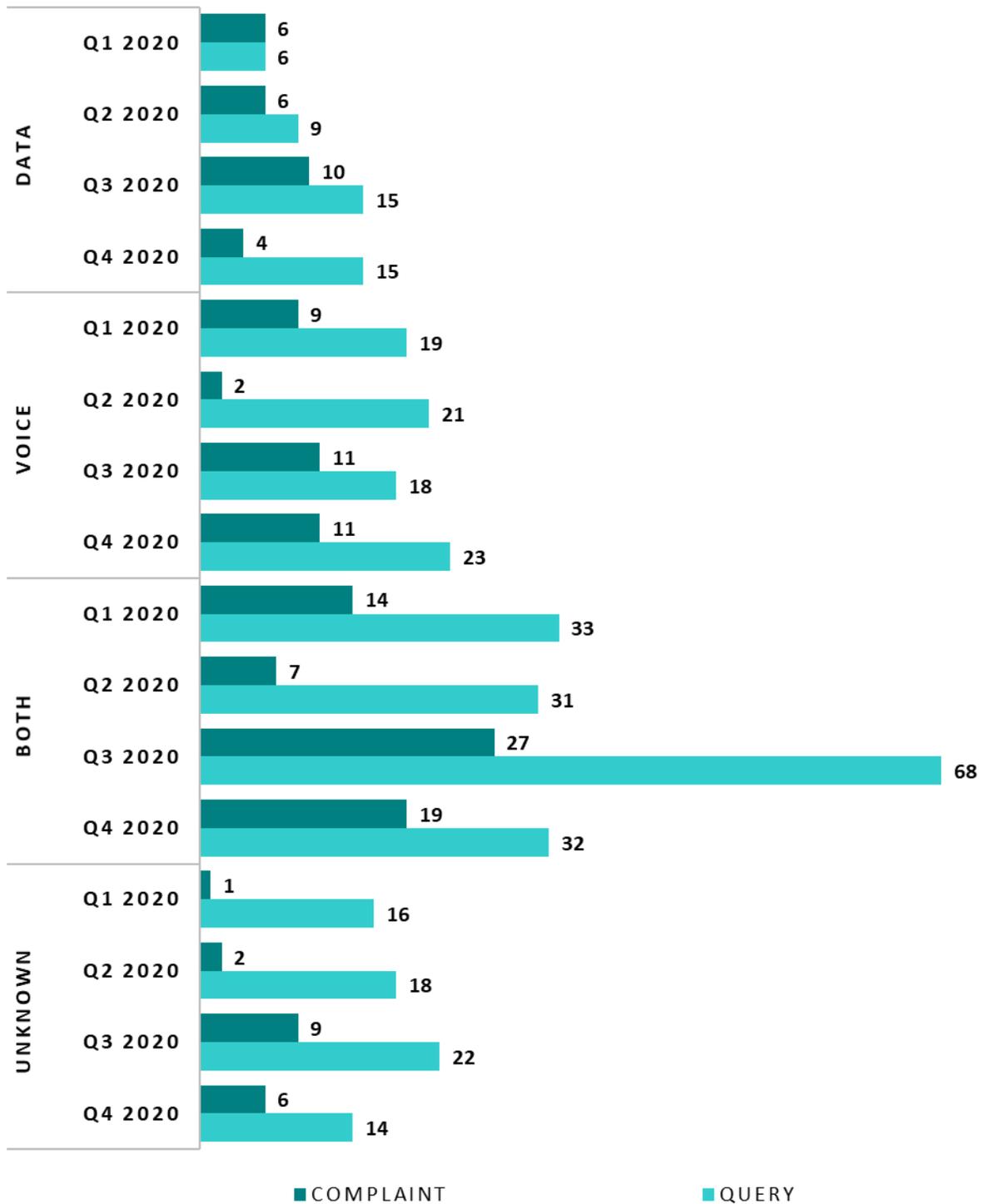


Figure 27: Number of ECS service issues by Mobile Service Provider Q3 2020 vs Q4 2020



*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 Q1 2020 – Q4 2020

Figure 29 shows the average number of mobile coverage issues recorded per 100,000 subscribers for each Mobile Service Provider⁴ listed in Figure 7. The ‘industry average’ is based on mobile coverage issues recorded for all Mobile Service Providers within each quarter.

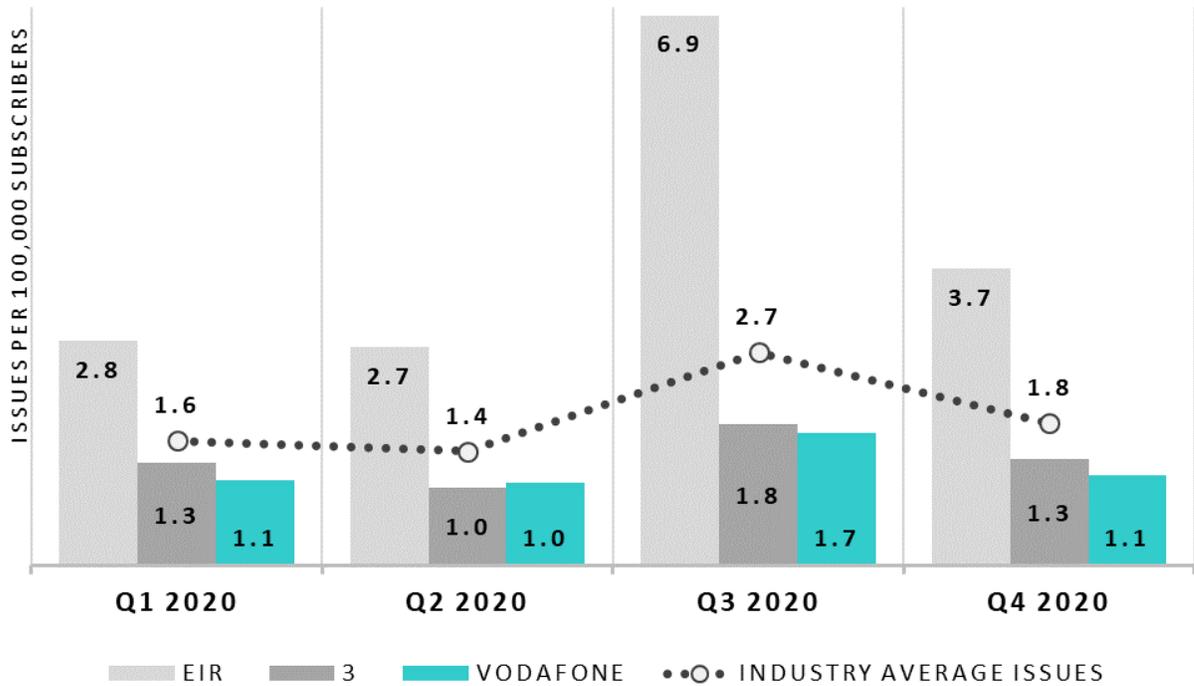


Figure 29: Mobile Coverage issues (per 100,000 Subscribers) Q1 2020 – Q4 2020

Annex 3: Classification Type Index

This Classification Type Index reflects the classification and sub-classification types¹¹ relevant to highest volume issues recorded in Q4 2020¹².

<p>Billing includes:</p> <ul style="list-style-type: none"> Billed after cancellation Billed for service not requested Billed more than agreed amount Refund not received
<p>Contractual Matters includes:</p> <ul style="list-style-type: none"> Contract termination issues - cancellation not accepted Contract termination issues - cancellation procedures Misleading sales Pricing transparency Terms & conditions - cancellation penalties Terms & conditions - unlimited/fair usage
<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>Other ECS includes:</p> <ul style="list-style-type: none"> Net neutrality - broadband speeds received
<p>Service Issues includes:</p> <ul style="list-style-type: none"> Equipment issues - handset Loss of service Mobile coverage 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

¹¹ Sub-classification types may vary each quarter based on the nature of issues reported by consumers.

¹² For detail on classification and sub-classification types relevant to highest volume issues recorded in Q3 2020, see ComReg Consumer Line Statistics Report Q3 2020.

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