



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

ComReg Consumer Line Statistics Report

Q3 2020 – 1 July to 30 September 2020

Information Notice

Reference: 20/106

Version: Final

Date: 30/10/2020

An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

1 Lárcheantar na nDugaí, Sráid na nGildeanna, BÁC 1, Éire, D01 E4X0.
One Dockland Central, Guild Street, Dublin 1, Ireland, D01 E4X0.
Teil | Tel +353 1 804 9600 Suíomh | Web www.comreg.ie

Content

Section	Page
1: Executive Summary	3
2: Consumer Contacts.....	4
3: Consumer Issues Recorded.....	5
3.1 All Issues Recorded.....	5
3.2 All Issues Recorded by Classification Type.....	7
3.3 All Issues Recorded by Queries vs Complaints	8
4: Mobile Service Provider Statistics.....	10
4.1 Mobile Service Provider ECS Queries vs Complaints	10
4.2 Mobile Service Provider ECS Complaints by Classification Type.....	12
4.3 Mobile Service Provider ECS Issues Recorded	13
4.4 Mobile Service Provider ECS Complaints Closed in Q3 2020.....	15
4.5 Mobile Service Provider ECS Complaints Open at 30 September 2020	18
4.6 Mobile Service Provider ECS Complaints per 100,000 Subscribers.....	19
4.7 Mobile Service Provider PRS Issues	20
5: Fixed Service Provider Statistics.....	22
5.1 Fixed Service Provider ECS Queries vs Complaints	22
5.2 Fixed Service Provider ECS Complaints by Classification Type	24
5.3 Fixed Service Provider ECS Issues Recorded	25
5.4 Fixed Service Provider ECS Complaints Closed in Q3 2020.....	27
5.5 Fixed Service Provider ECS Complaints Open at 30 September 2020	30
5.6 Fixed Service Provider ECS Complaints per 100,000 Subscribers	31

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 2020¹.

In Q3 2020, ComReg's Consumer Care team recorded approximately 27,100 contacts and 9,559 issues. In Q2 2020, 11,269 issues were recorded, and approximately 27,000 consumer contacts were received. ComReg's Consumer Care team managed approximately 9,000 Service Provider contacts during Q3 2020, compared to 7,000 in Q2 2020. 76% of all issues recorded were queries and 24% of all issues were complaints. 74% of all issues recorded relate to ECS, 19% relate to PRS, and 7% relate to 'Not for ComReg'/Other.

In Q3 2020, ComReg's Consumer Care team recorded 955 Mobile Service Provider issues for Eir. 519 issues were recorded for 3. 454 issues were recorded for Vodafone. The median resolution time for Mobile Service Provider complaints was 12.0 working days, compared to 8.0 working days in Q2 2020. The average number of complaints per 100,000 subscribers was 9.0, compared to an average of 7.5 complaints per 100,000 subscribers in Q2 2020.

In Q3 2020, ComReg's Consumer Care team recorded 2,872 Fixed Service Provider issues for Eir. 294 issues were recorded for Sky Ireland Limited. 319 issues were recorded for Virgin Media. 724 issues were recorded for Vodafone. The median resolution time for Fixed Service Provider complaints was 10.0 working days, compared to 6.0 working days in Q2 2020. The average number of complaints per 100,000 subscribers was 103.2, compared to an average of 62.7 complaints per 100,000 subscribers in Q2 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 Q3 2020, approximately 27,100 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 2020, phone and e-mail/online form continued to be the most popular methods of contact. ComReg’s Consumer Line received approximately 9,000 service provider contacts in Q3 2020.

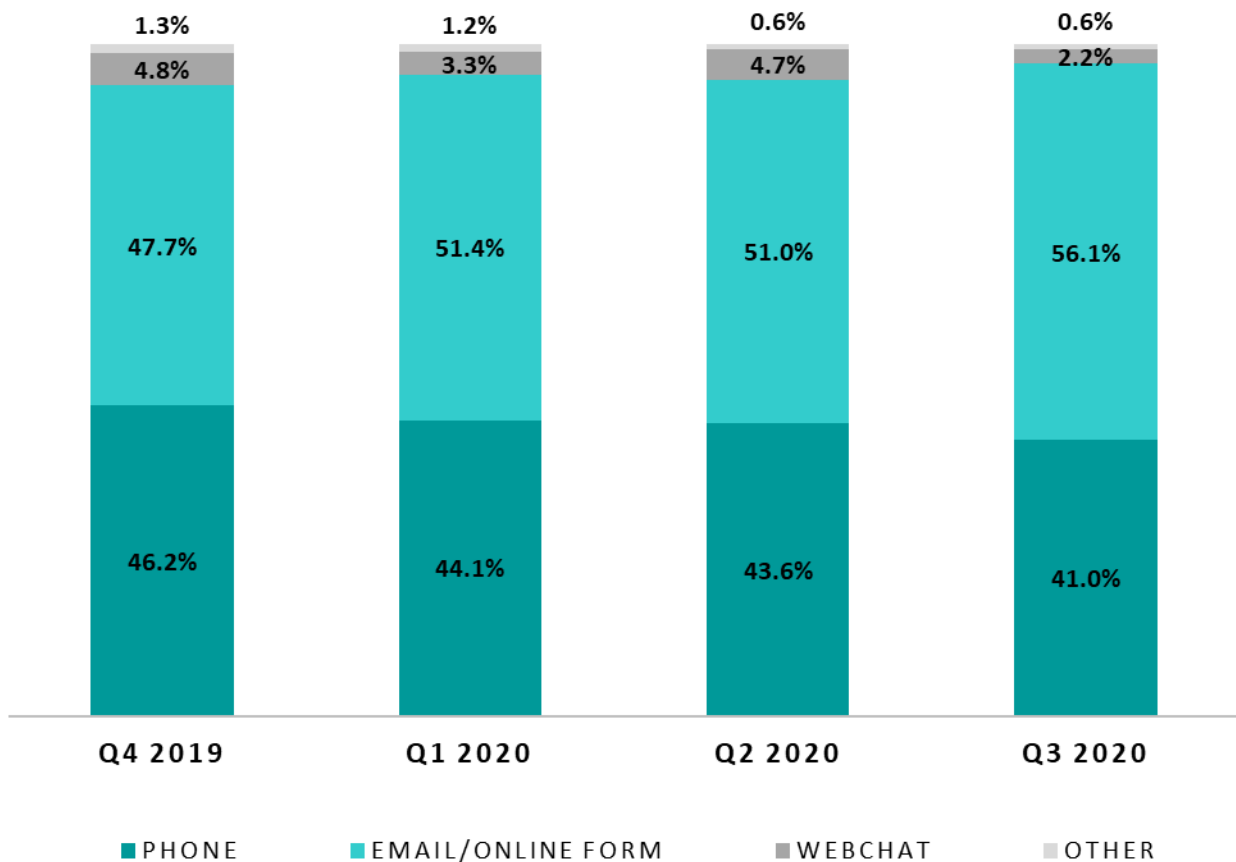


Figure 1: Split of contacts to ComReg’s Consumer Line by channel Q4 2019 – Q3 2020

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 Q3 2020, ComReg recorded 9,559 issues which are classified across three main categories: ECS, PRS and 'Not for ComReg/Other'. There was a 15% decrease in the total number of issues recorded compared to Q2 2020; ECS issues increased by 20%, and PRS issues decreased by 60%. 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 Q3 2019 to Q3 2020.

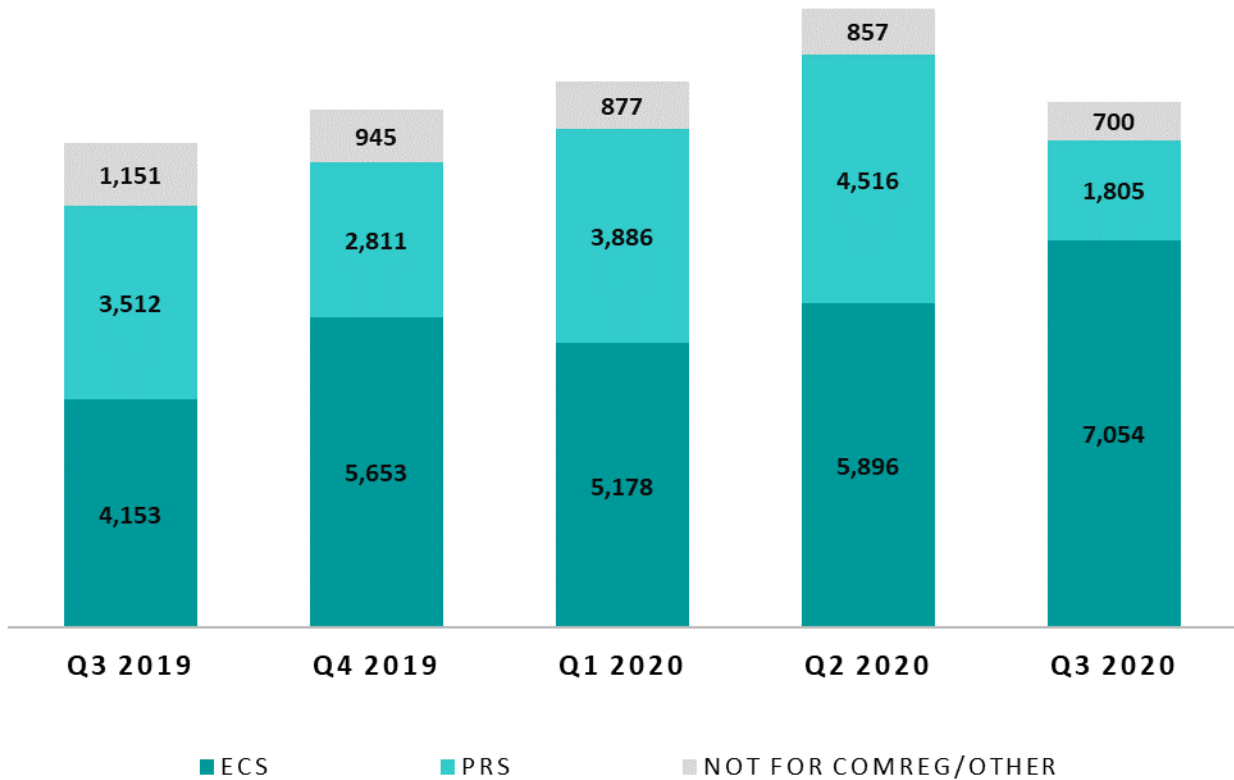


Figure 2: Number of issues recorded Q3 2019 – Q3 2020 by category

In Q3 2020, 74% of all issues recorded were in relation to ECS, while PRS and 'Not for ComReg/Other' issues accounted for 19% and 7% of all other issues, respectively. Figure 3 below shows the split of these three category types.

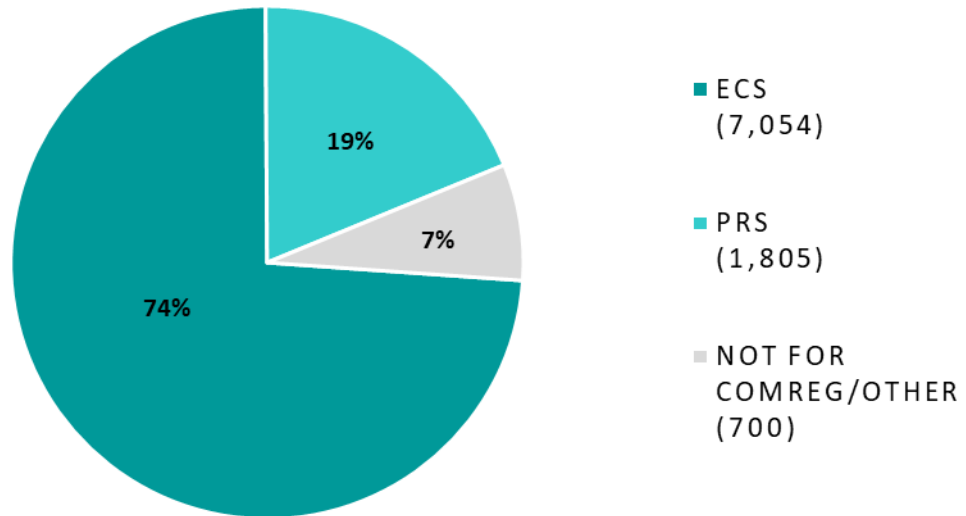


Figure 3: Split of all issues recorded in Q3 2020 by category

3.2 All Issues Recorded by Classification Type³

In Q3 2020, a total of 9,559 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 Q2 2020 to Q3 2020.

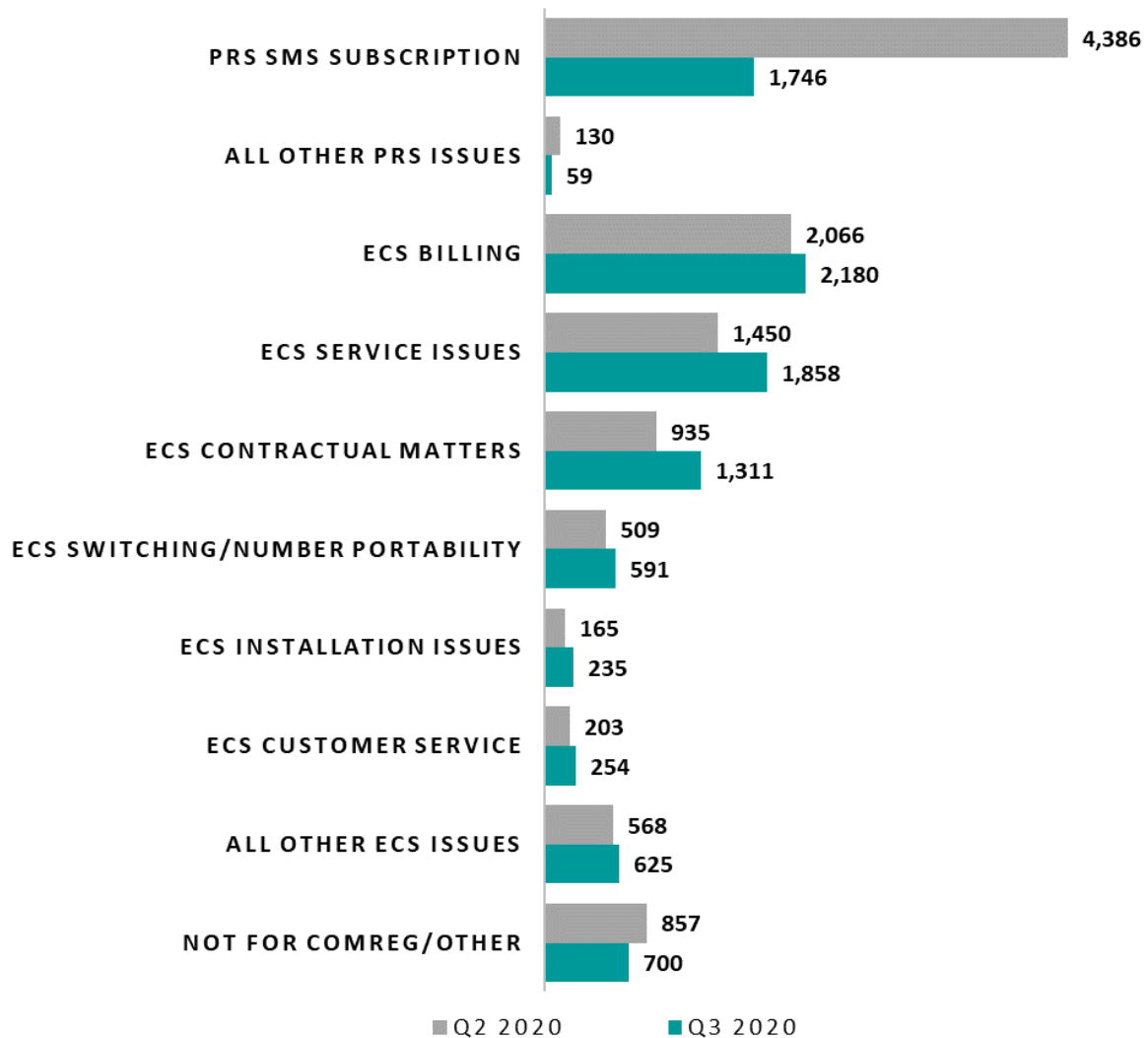


Figure 4: Number of issues recorded by classification type Q2 2020 vs Q3 2020

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 Q3 2020, 76% of all issues recorded were queries, and 24% were complaints. Of the 7,262 queries recorded in Q3 2020, 69% were in relation to ECS and 21% were in relation to PRS. Of the 2,297 complaints recorded, 88% were in relation to ECS and 12% were in relation to PRS. For further detail on the highest volume ECS issues recorded, see Figure 10 and Figure 21.

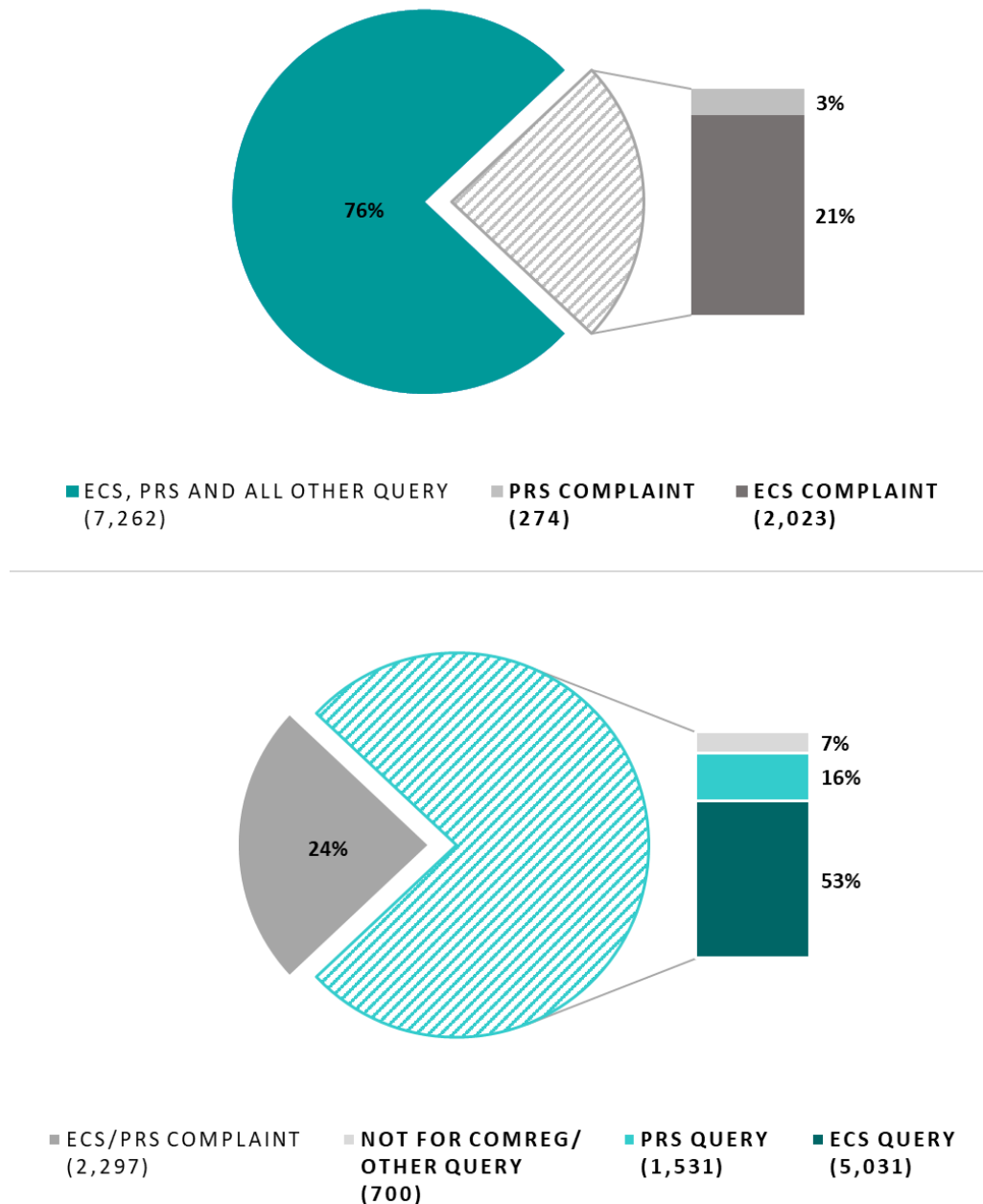


Figure 5: Split of issues recorded by issue type and category Q3 2020

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 Q3 2019 to Q3 2020. From Q3 2019 to Q3 2020, ECS queries increased by 60% and PRS queries decreased by 52%; ECS complaints increased by 101%, and PRS complaints decreased by 18%. 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.

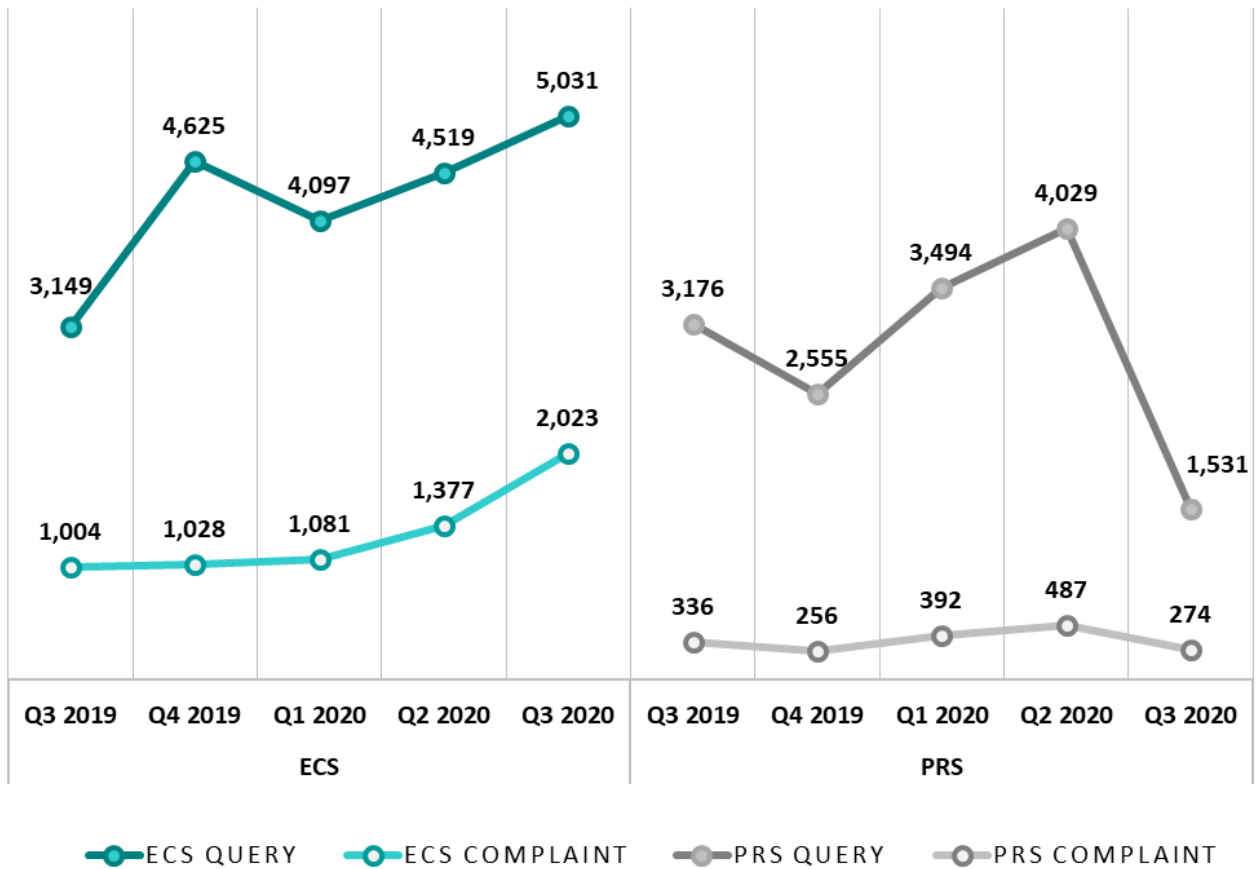


Figure 6: ECS and PRS complaints and queries recorded Q3 2019 – Q3 2020

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 and Vodafone, comparing Q2 2020 to Q3 2020.

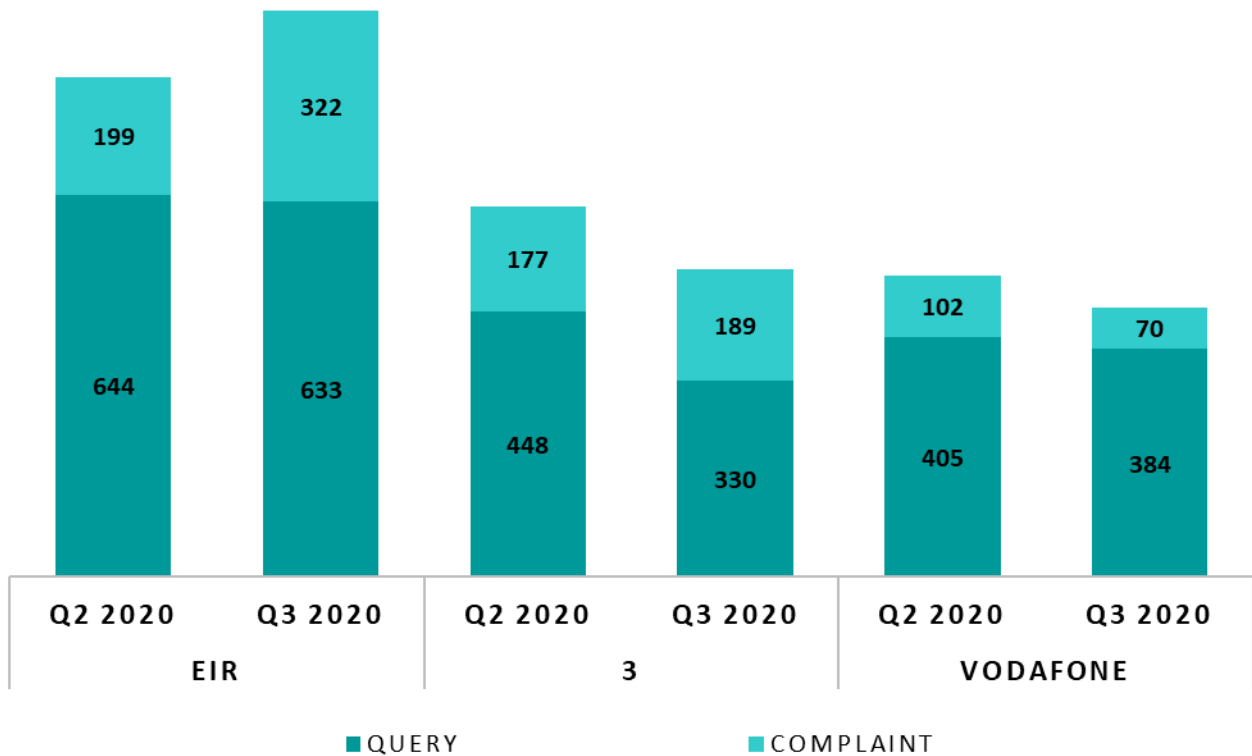


Figure 7: Number of ECS queries and complaints by Mobile Service Provider Q2 2020 vs Q3 2020

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

Figure 8 shows the split of queries to complaints recorded for Eir⁴, 3 and Vodafone, including the total industry average, comparing Q2 2020 to Q3 2020. The ‘industry average’ is based on all issues recorded within each quarter for all Mobile Service Providers.

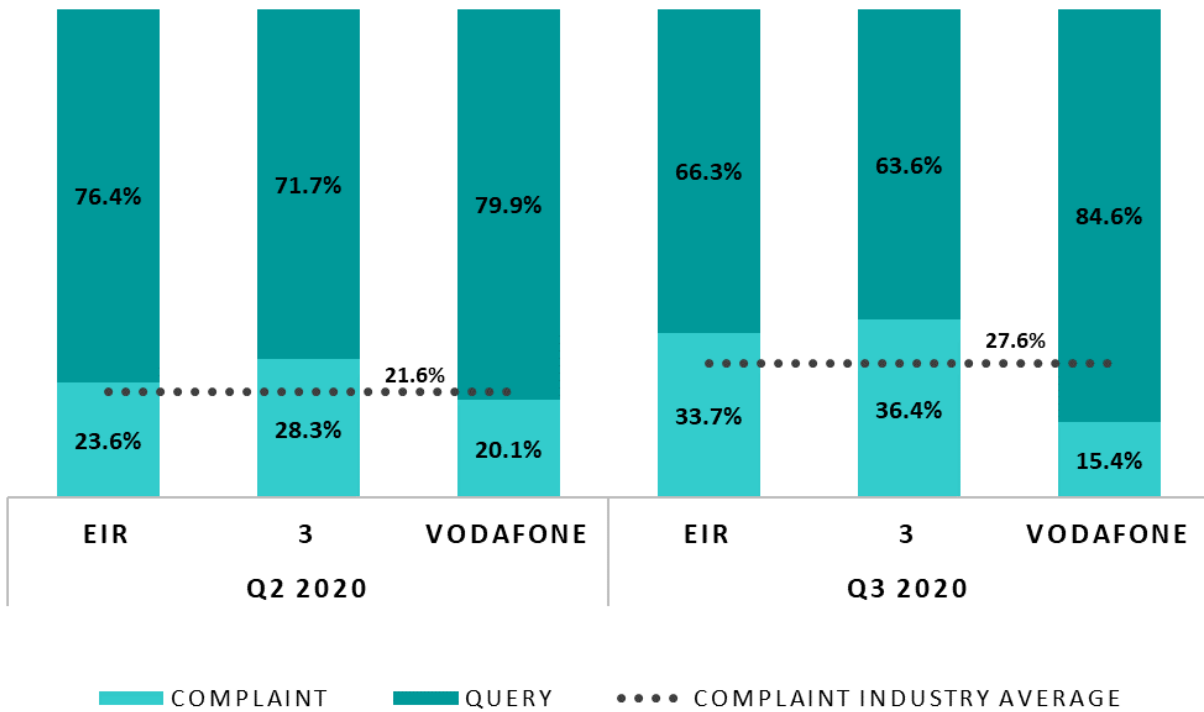


Figure 8: Split of ECS queries and complaints by Mobile Service Provider Q2 2020 vs Q3 2020

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 Q2 2020 with Q3 2020. For details of the highest number of issues recorded for each Mobile Service Provider, see Figure 10.

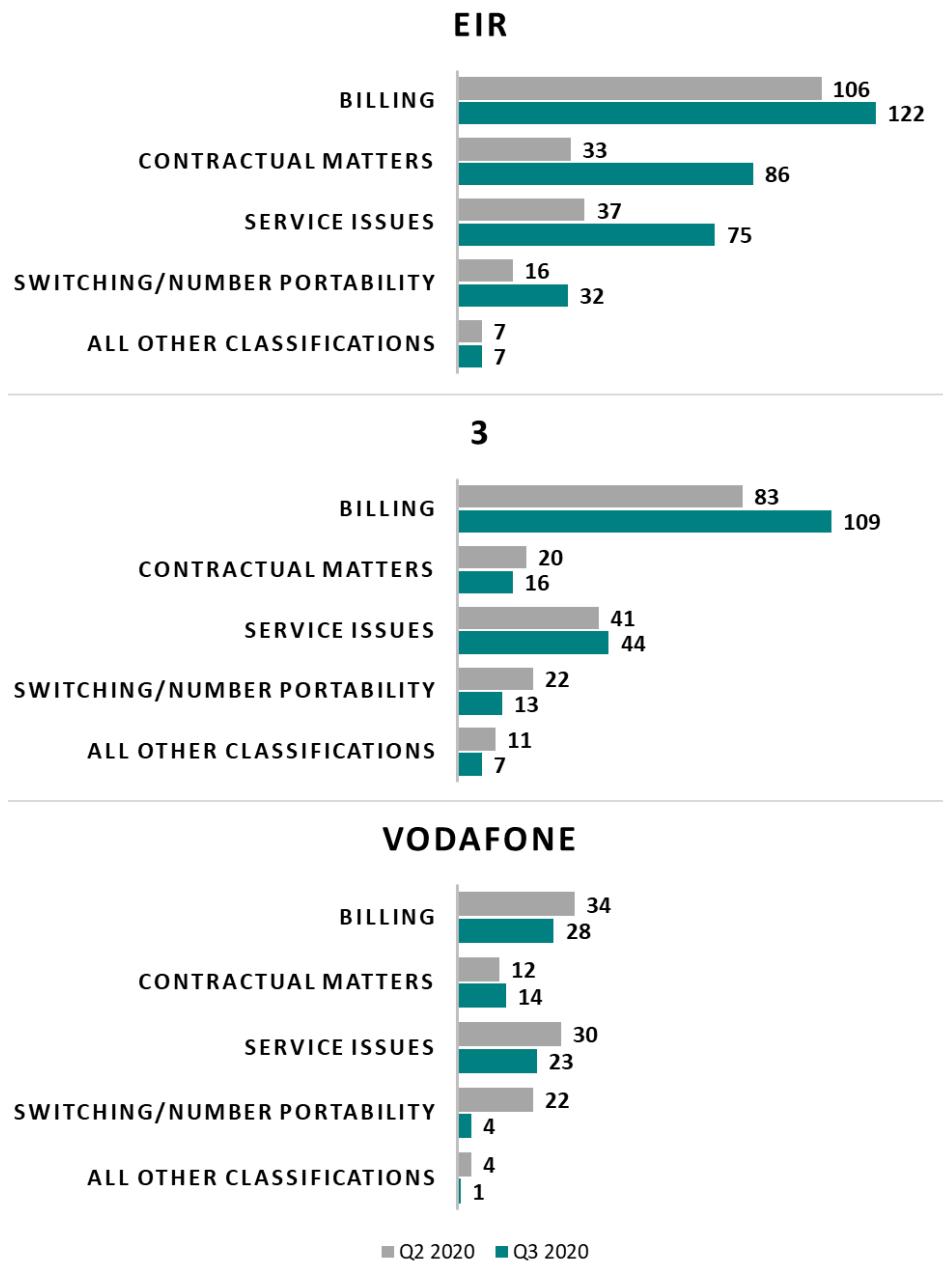


Figure 9: Mobile Service Provider ECS complaints by classification type Q2 2020 vs Q3 2020

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 Q2 2020 to Q3 2020.

	Number of Issues Q2 2020	Number of Issues Q3 2020
Eir⁴		
Billed more than agreed amount	151	110
Loss of service	71	87
Mobile coverage	32	80
Contract termination issues - cancellation procedures	45	79
Billed after cancellation	49	59
Refund not received	44	44
Contract termination issues - cancellation not accepted	26	43
Service issues - intermittent service	35	39
Switching/number portability - unlock code issue		37
Switching/number portability - delay switching	34	35
3		
Billed more than agreed amount	123	91
Mobile coverage	23	42
Refund not received	32	37
Loss of service	42	35
Billed after cancellation	20	30
Switching/number portability - unlock code issue	24	25
Billed for service not requested		21
Service issues - intermittent service	39	20
Billed for service not received	24	18
Credit not applied	24	18

Vodafone		
Billed more than agreed amount	55	59
Mobile coverage	27	43
Switching/number portability - unlock code issue	50	33
Loss of service	40	26
Billed after cancellation		24
Misleading sales		23
Equipment issues - handset	24	21
Billed for service not received		16
Billed for service not requested	15	15
Contract termination issues - cancellation procedures		15

Figure 10: Highest number of issues recorded by Mobile Service Provider Q2 2020 vs Q3 2020

4.4 Mobile Service Provider ECS Complaints Closed in Q3 2020

Figure 11 shows the number of ECS complaints closed in Q3 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 Q3 2020 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

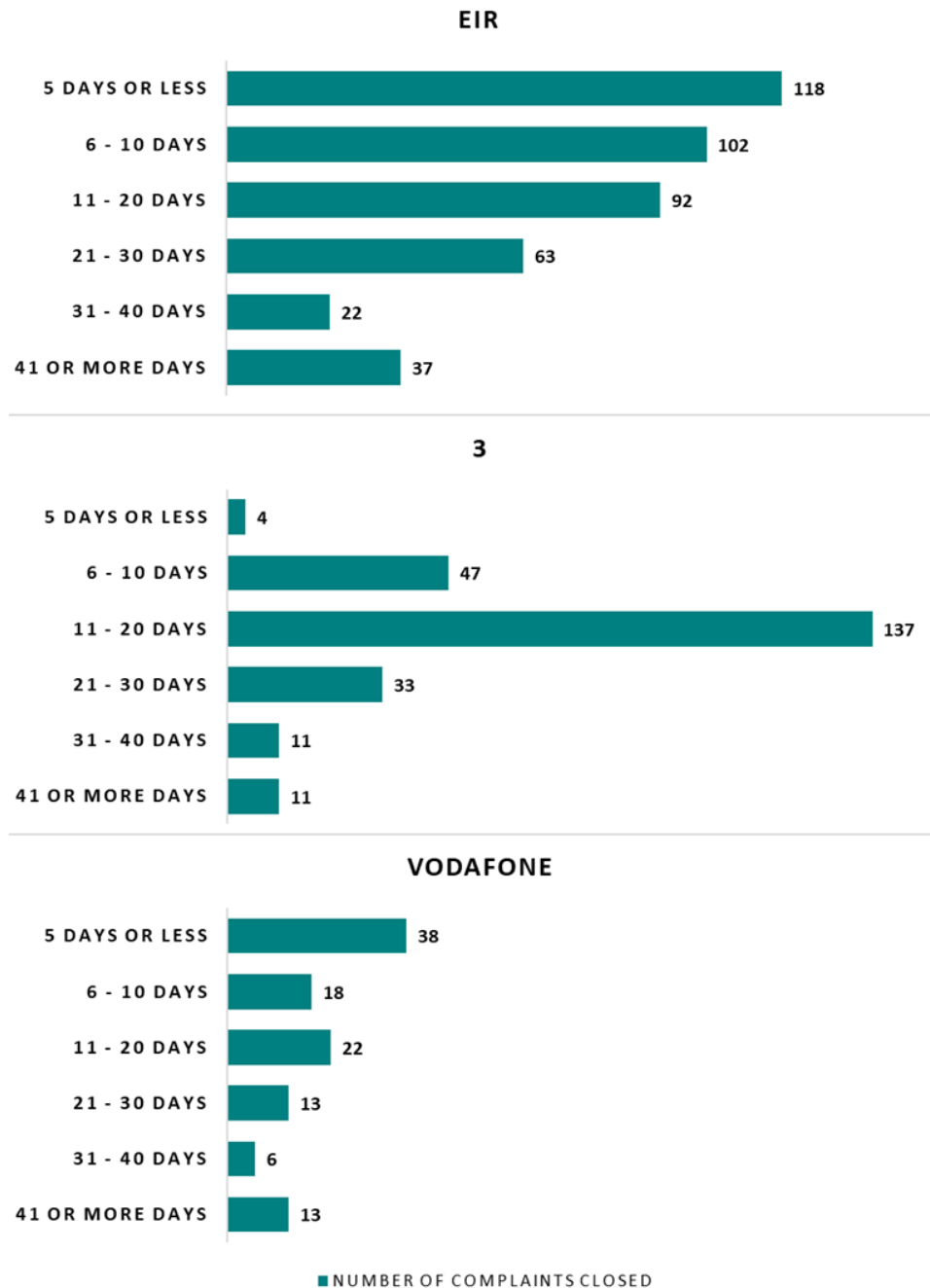


Figure 11: ECS complaints closed in Q3 2020 by Mobile Service Provider and number of working days open

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 Q2 2020⁵ to Q3 2020. Complaints closed within Q3 2020 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 July 2020. The ‘industry median’ is a ‘snapshot’ based on all complaints closed within each quarter for all Mobile Service Providers.

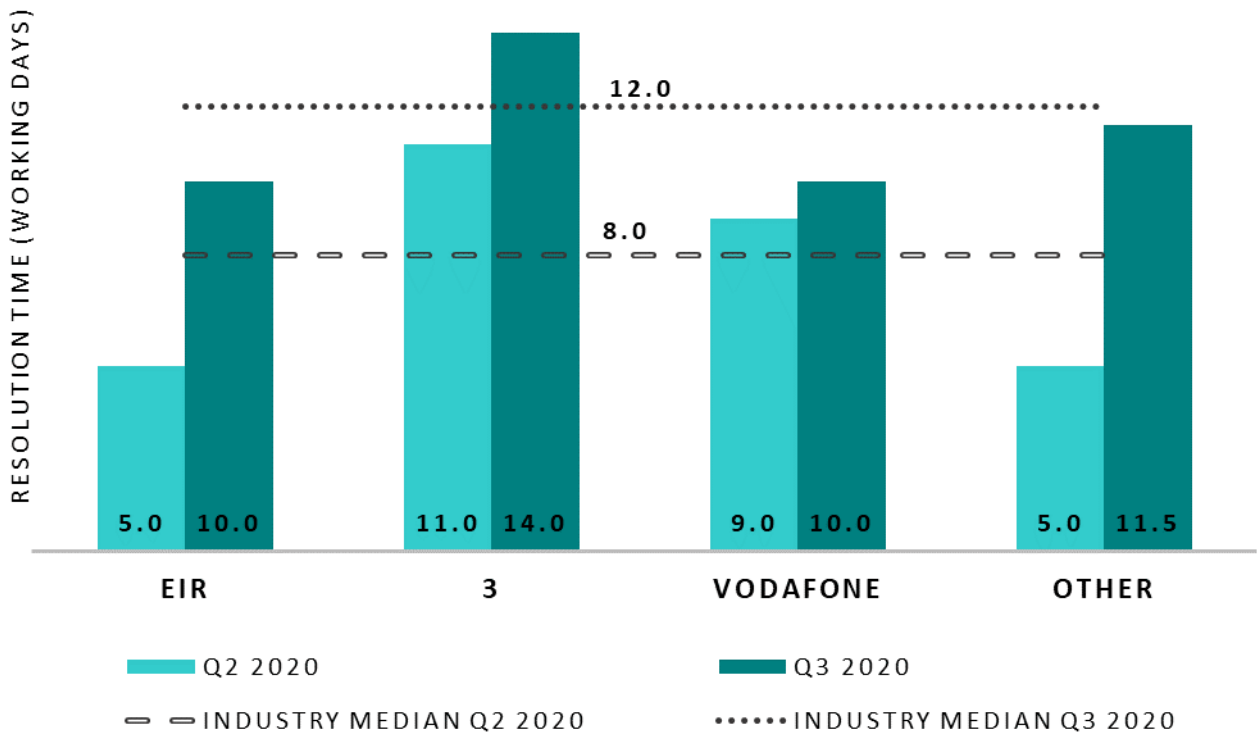


Figure 12: Median complaint resolution time by Mobile Service Provider Q2 2020 vs Q3 2020

⁵ For details of complaints closed in Q2 2020, see ComReg Consumer Line Statistics Report Q2 2020.

Figure 13 provides a further breakdown of the Q3 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.

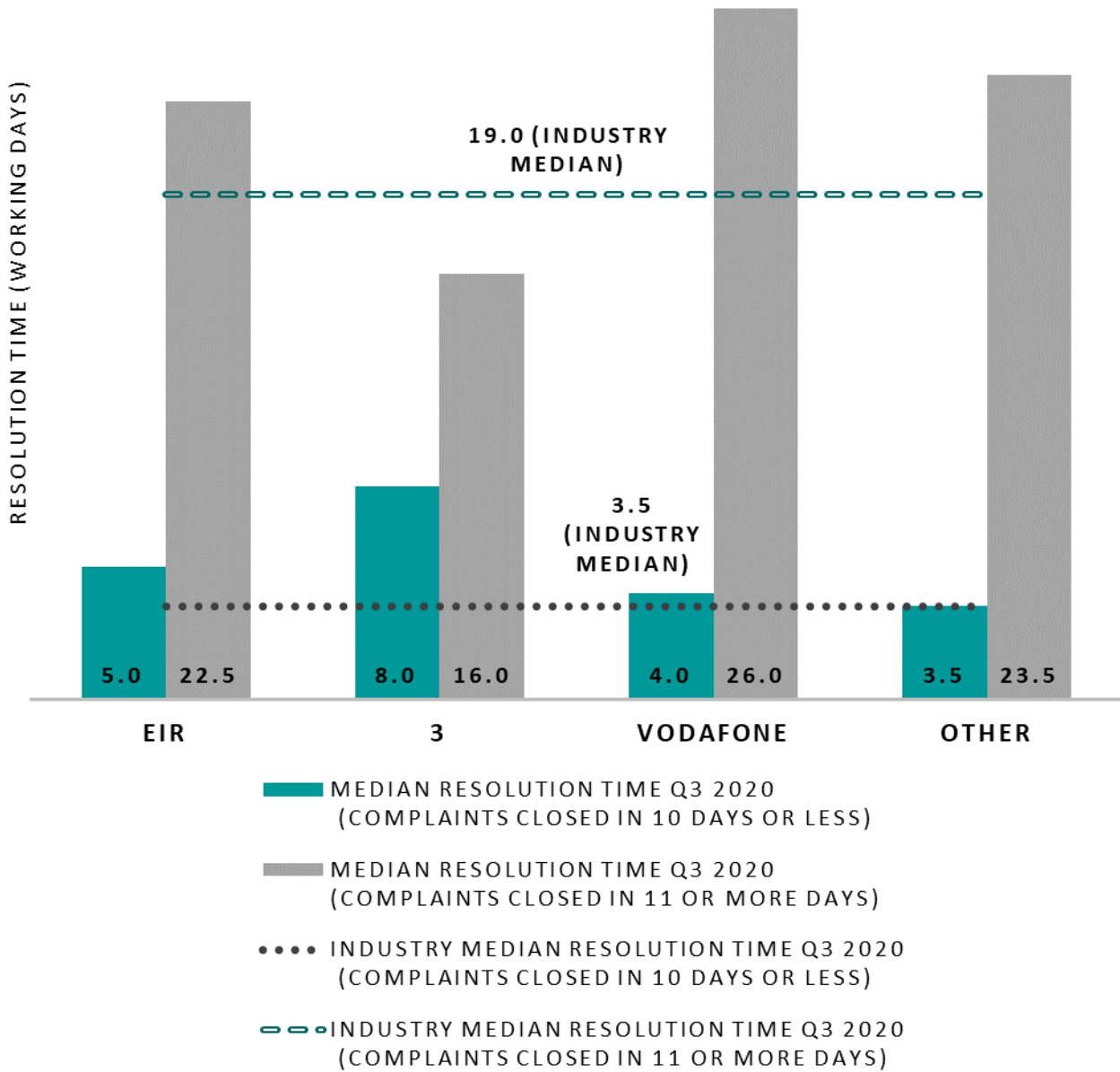


Figure 13: Median complaint resolution time by Mobile Service Provider Q3 2020, complaints closed in 10 days or less vs complaints closed in 11 days or more

4.5 Mobile Service Provider ECS Complaints Open at 30 September 2020

Figure 14 shows the number ECS complaints open at 30 September 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.

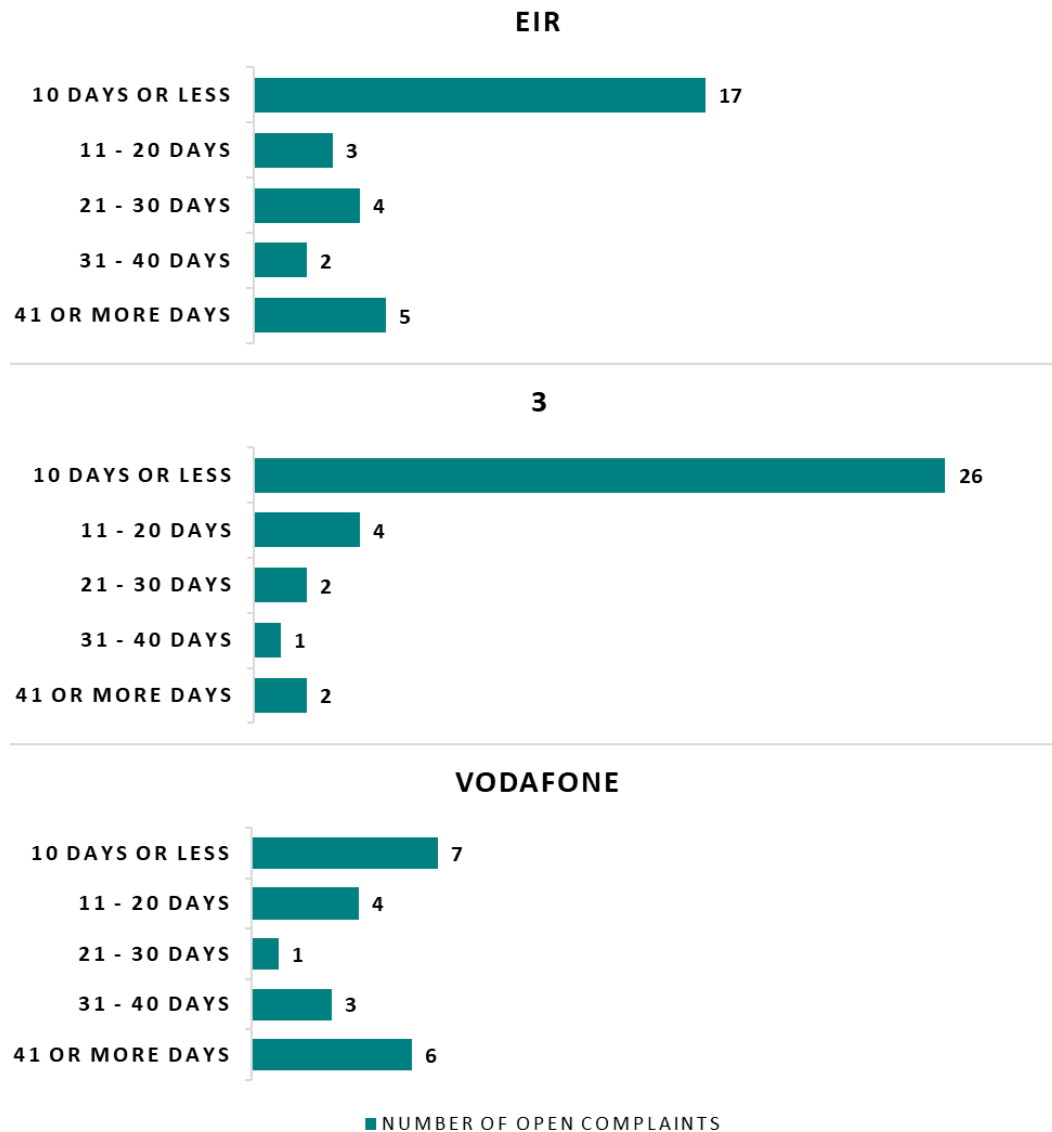


Figure 14: Mobile Service Provider ECS complaints open at 30 September 2020 by number of working days since first escalation

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 Q2 2020 to Q3 2020. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Mobile Service Providers.

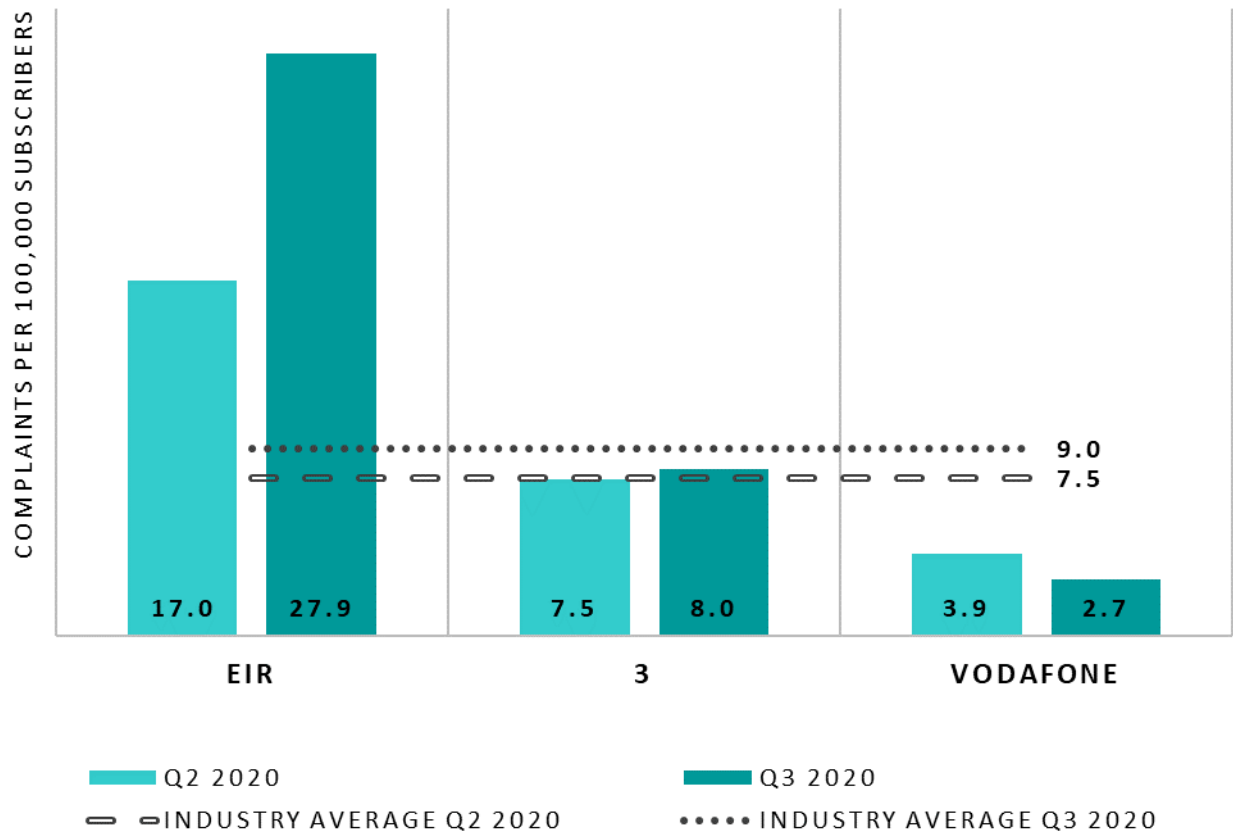


Figure 15: ECS complaints per 100,000 subscribers by Mobile Service Provider Q2 2020 vs Q3 2020

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 Q3 2020 split by short code and premium rate service provider⁶ (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
	57977 (txtNation Ltd)	57976 (txtNation Ltd)	57721 (mGage Europe Limited)	Other	
Eir	219	188	30	252	689
Tesco Mobile Ireland	59	69	2	69	199
3	110	93	22	142	367
Virgin Media	10	22	0	10	42
Vodafone	91	51	0	97	239
Other	60	51	5	153	269
Total	549	474	59	723	1,805

Figure 16: Number of PRS issues recorded by PRS short code, premium rate service provider and Mobile Service Provider Q3 2020

⁶ <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 Q2 2020 to Q3 2020. The ‘industry average’ is based on all PRS issues recorded for all Mobile Service Providers within each quarter.

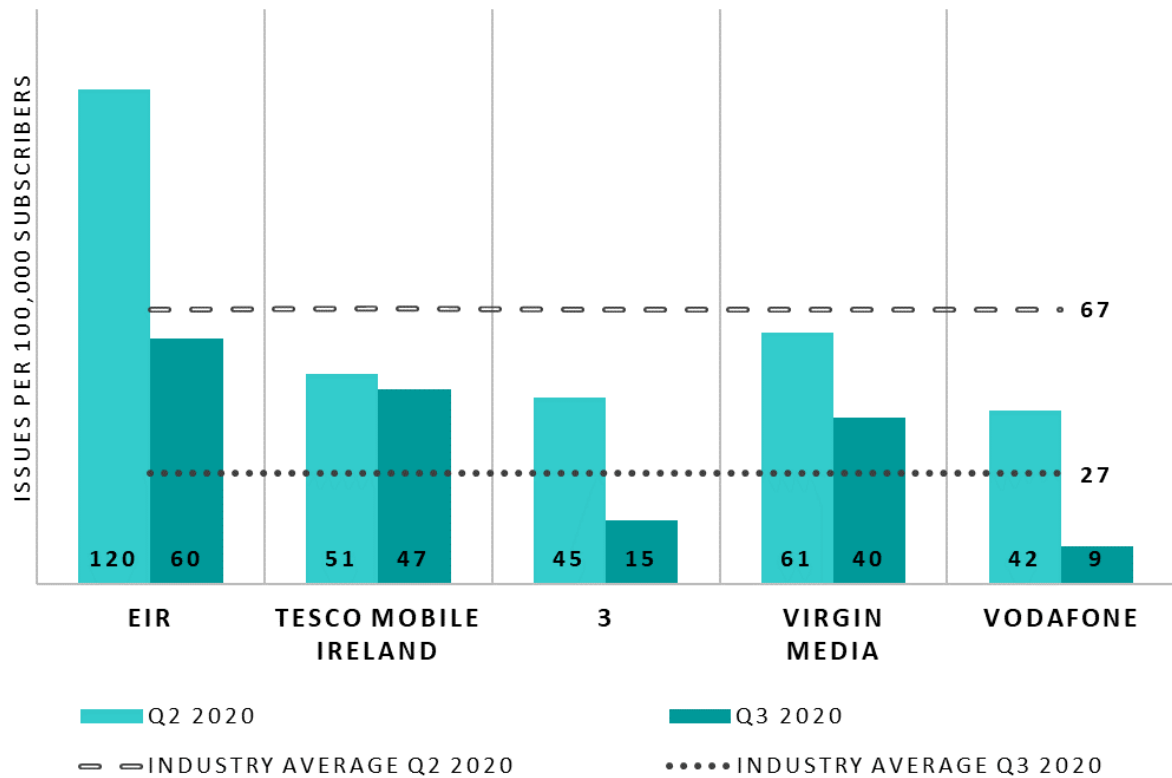


Figure 17: PRS issues by ECS Provider per 100,000 subscribers Q2 2020 vs Q3 2020

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 Q2 2020 to Q3 2020.

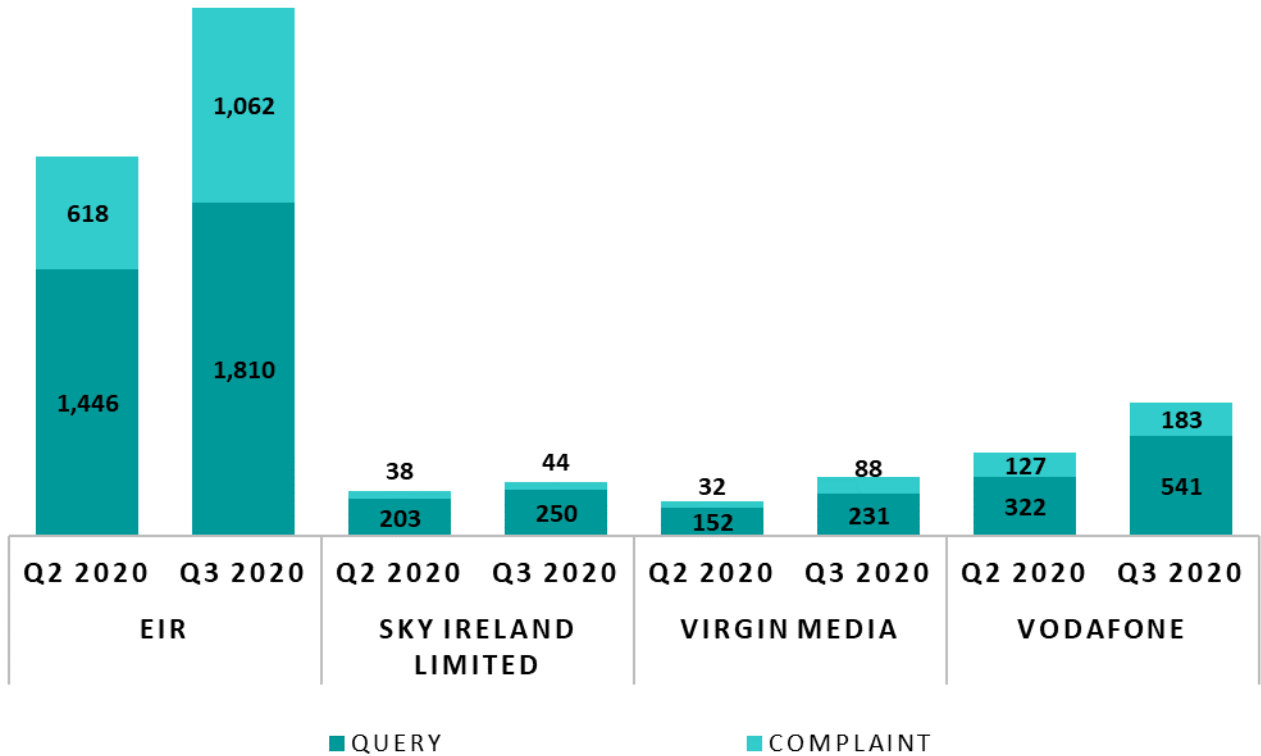


Figure 18: Number of ECS issues queries and complaints by Fixed Service Provider Q2 2020 vs Q3 2020

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 Q2 2020 to Q3 2020. The 'industry average' is based on all issues recorded within each quarter for all Fixed Service Providers.

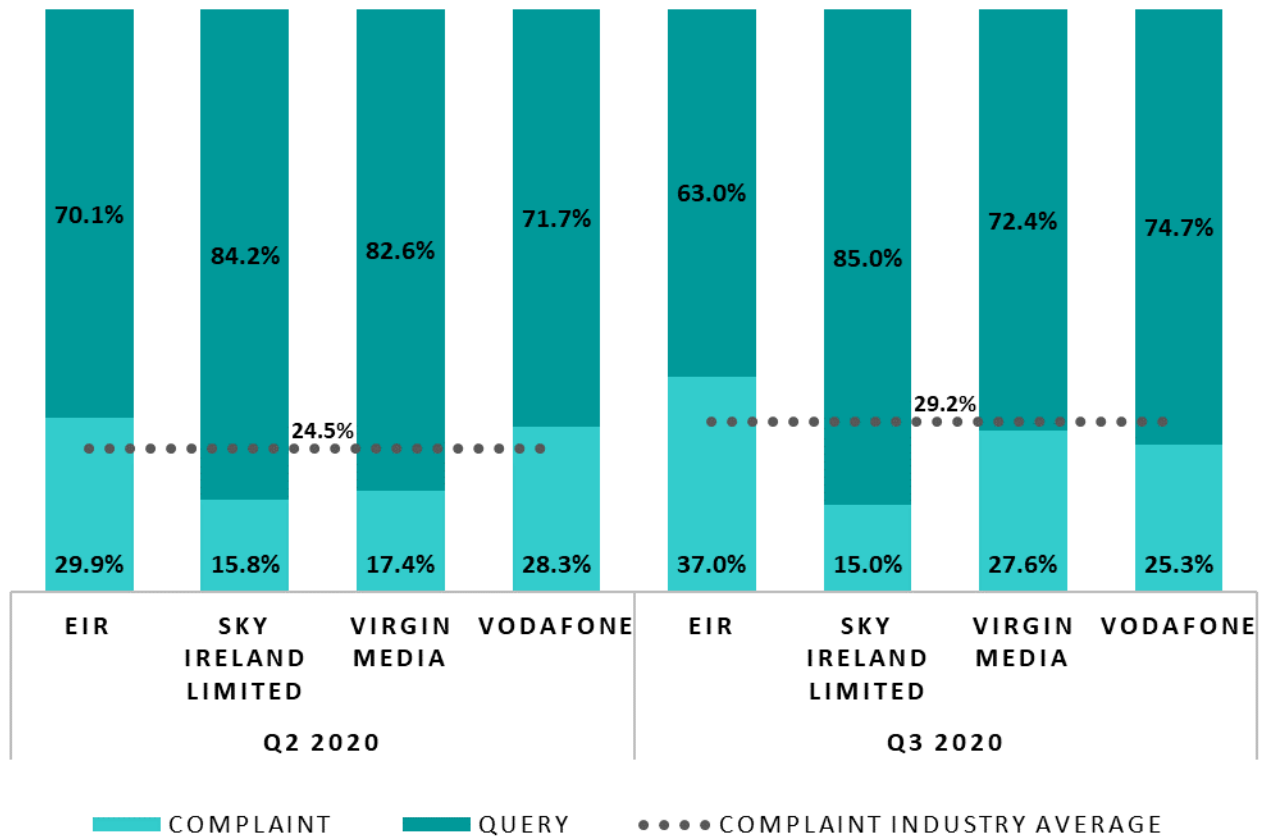


Figure 19: Split of ECS queries and complaints by Fixed Service Provider Q2 2020 vs Q3 2020

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 Q2 2020 with Q3 2020. For details of the highest number of issues recorded for each Fixed Service Provider, see Figure 21.

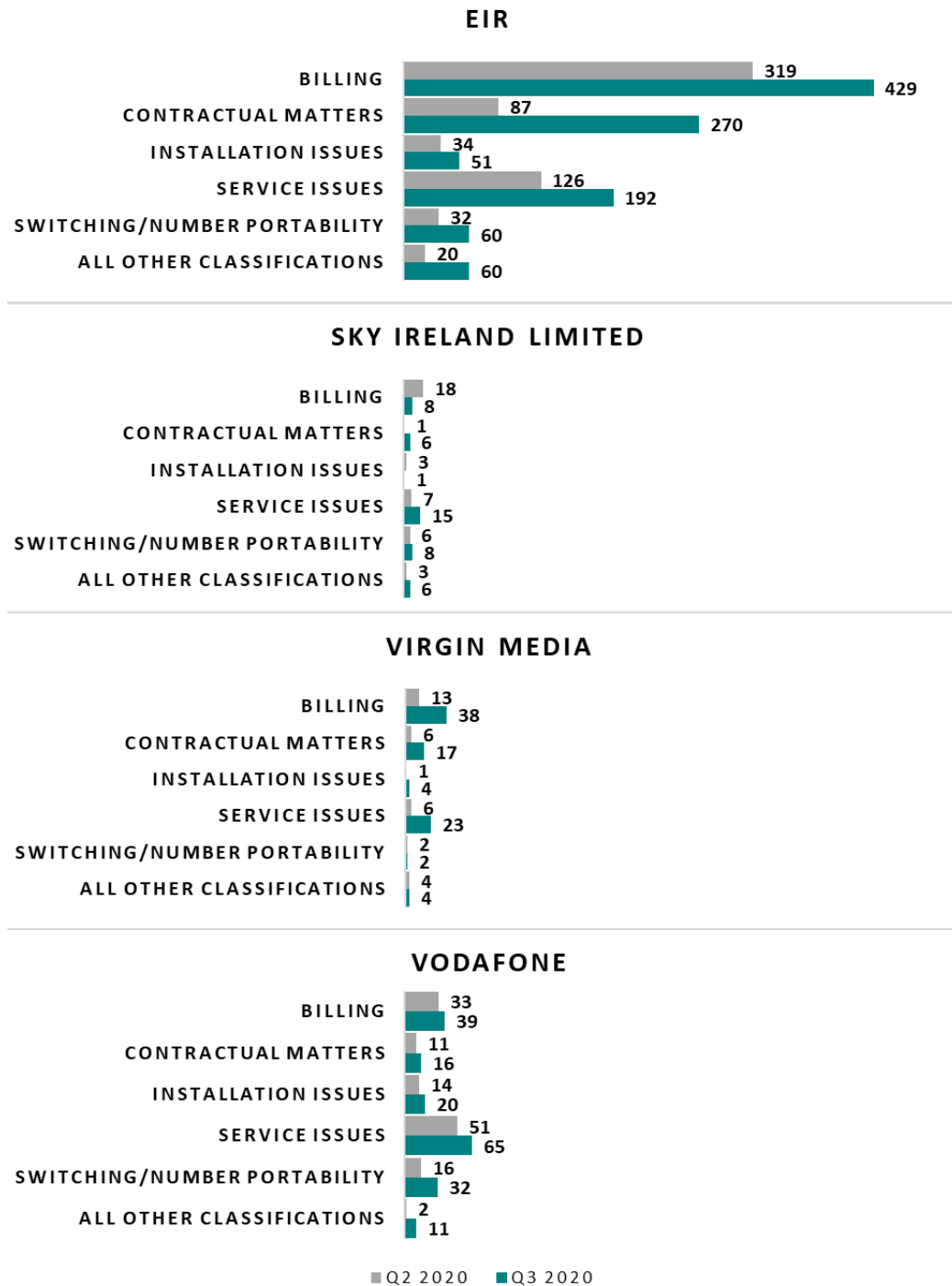


Figure 20: Fixed Service Provider ECS complaints by classification type Q2 2020 vs Q3 2020

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 Q2 2020 to Q3 2020.

	Number of Issues Q2 2020	Number of Issues Q3 2020
Eir		
Billed more than agreed amount	369	359
Loss of service	210	331
Contract termination issues - cancellation procedures	154	331
Billed after cancellation	269	304
Service issues - e-mail	74	185
Contract termination issues - cancellation not accepted	69	156
Service issues - intermittent service	90	132
Delay in installation	89	104
Accessing complaints process - issue lodging formal complaint	50	87
Refund not received		85
Sky Ireland Limited		
Loss of service	34	44
Billed more than agreed amount	31	28
Billed after cancellation	32	26
Contract termination issues - cancellation procedures	10	22
Service issues - intermittent service	21	20
Net neutrality - broadband speeds received	11	20
Switching/number portability - delay switching	12	13
Switching/number portability - UAN/CRN issue	8	13
Delay in installation	9	11
Contract termination issues - cancellation not accepted		8

Virgin Media		
Billed more than agreed amount	30	56
Contract termination issues - cancellation procedures	14	29
Loss of service	6	27
Billed after cancellation	15	25
Service issues - intermittent service	12	22
Accessing complaints process - issue lodging formal complaint		15
Contract termination issues - cancellation not accepted	9	10
Misleading sales		10
Delay in installation		10
Net neutrality - broadband speeds received		9
Vodafone		
Loss of service	84	138
Billed after cancellation	31	70
Service issues - intermittent service	46	53
Delay in installation	24	49
Billed more than agreed amount	31	46
Switching/number portability - UAN/CRN issue		46
Switching/number portability - number loss	27	40
Net neutrality - broadband speeds received	20	39
Switching/number portability - delay switching	12	29
Contract termination issues - cancellation not accepted		22

Figure 21: Highest number of issues recorded by Fixed Service Provider Q2 2020 vs Q3 2020

5.4 Fixed Service Provider ECS Complaints Closed in Q3 2020

Figure 22 below shows ECS complaints closed in Q3 2020, for each Fixed Service Provider listed in Figure 18, broken down by number of working days. Complaints closed within Q3 2020 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

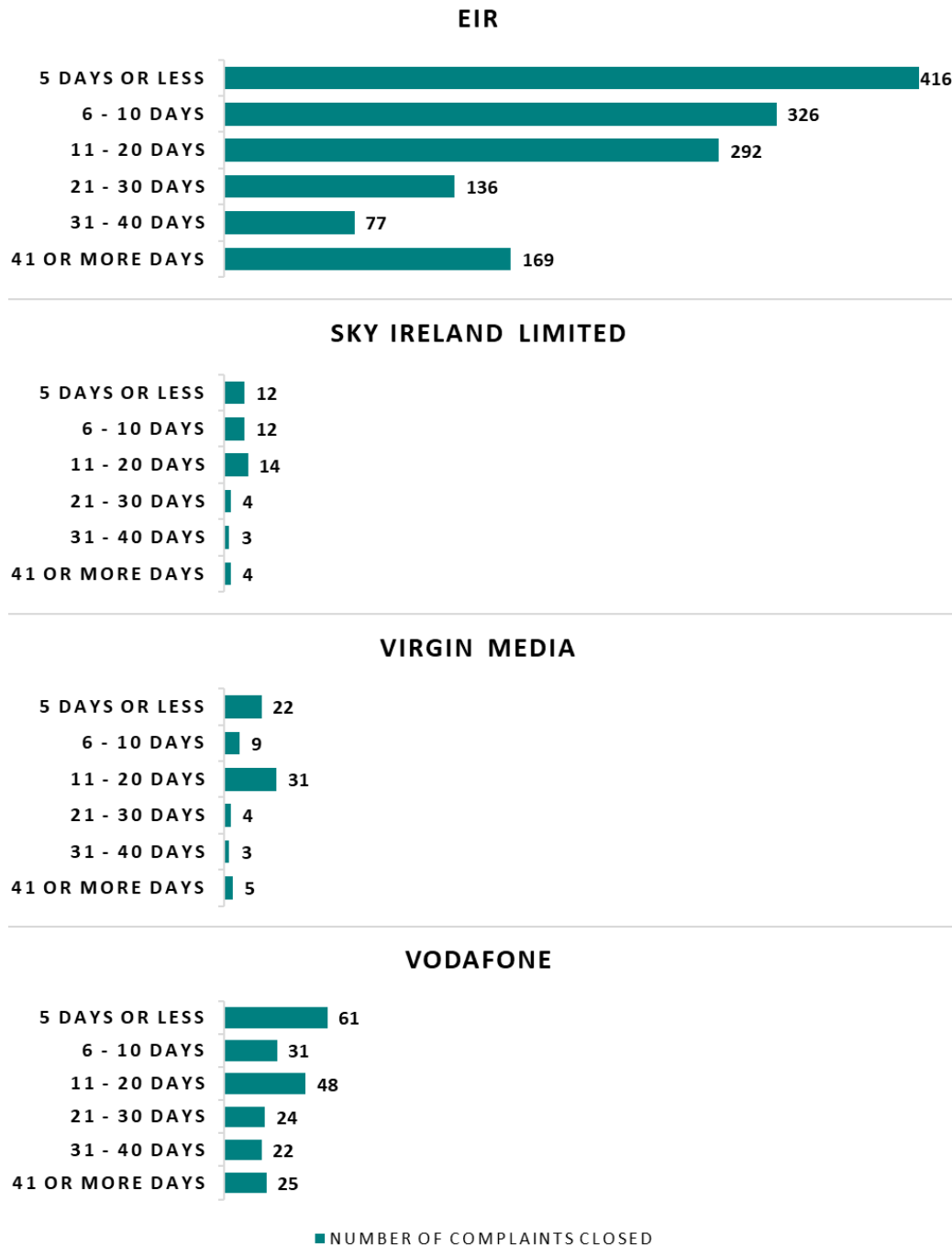


Figure 22: Fixed Service Provider ECS complaints closed in Q3 2020 by number of working days open

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 Q2 2020⁵ to Q3 2020. Complaints closed within Q3 2020 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 July 2020. The ‘industry median’ is a ‘snapshot’ based on all complaints closed within each quarter for all Fixed Service Providers.

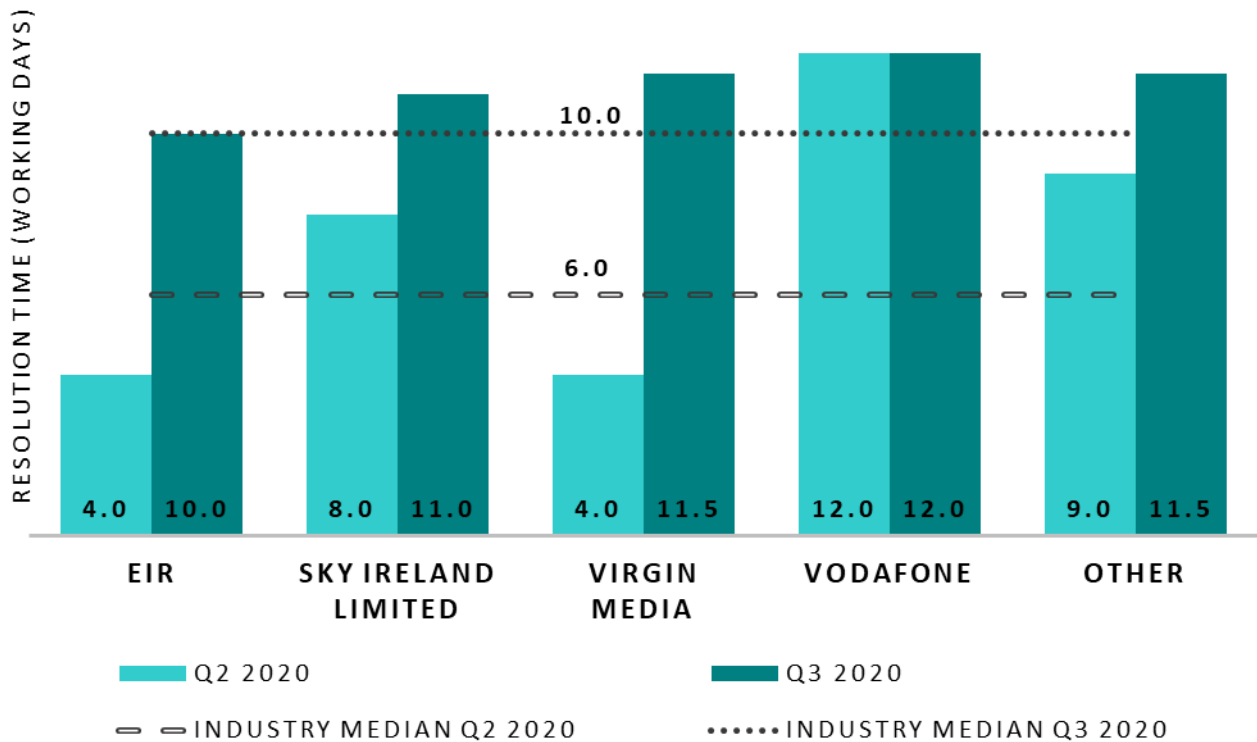


Figure 23: Median complaint resolution time by Fixed Service Provider Q2 2020 vs Q3 2020

Figure 24 provides a further breakdown of the Q3 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.

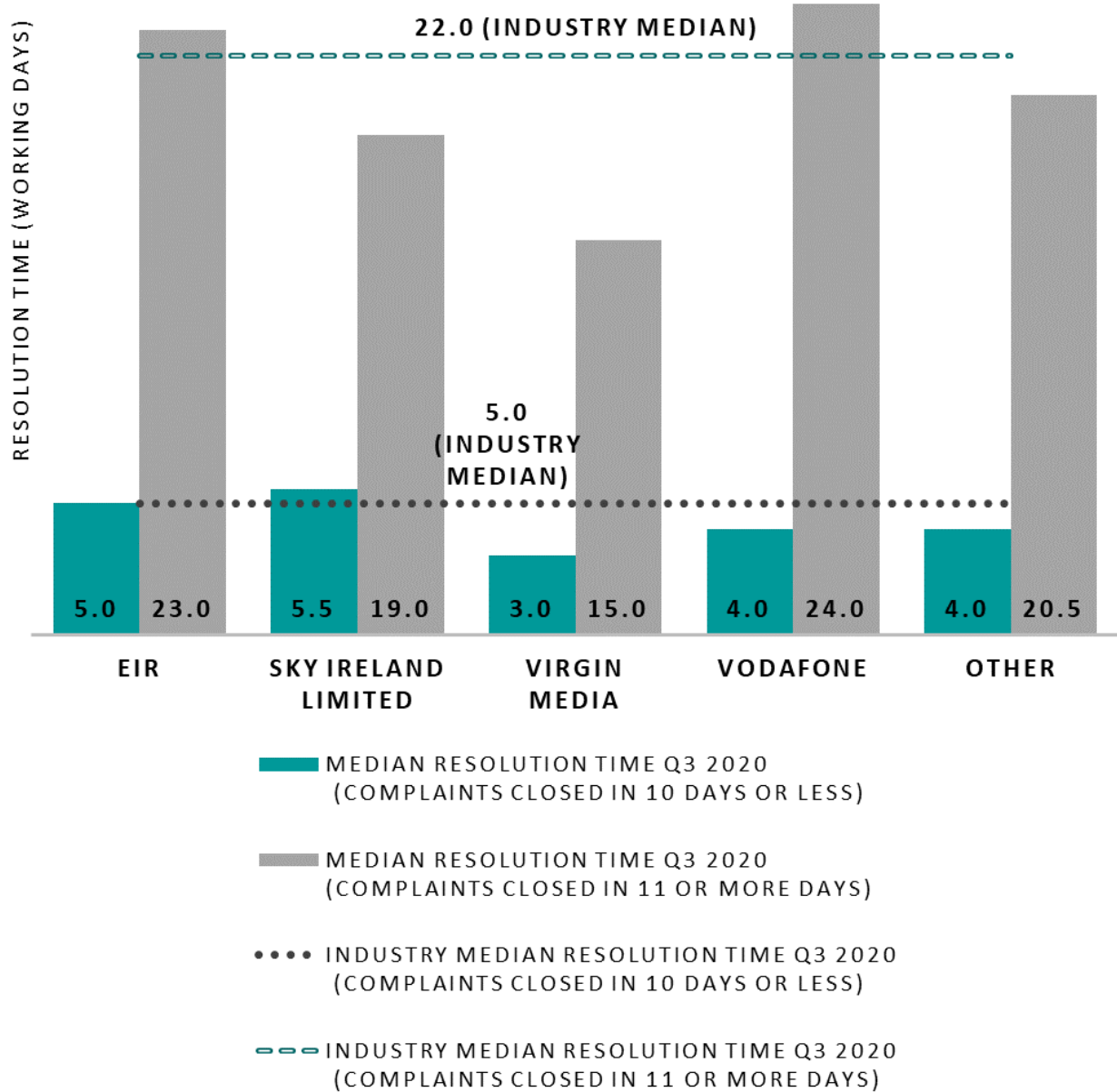


Figure 24: Median complaint resolution time by Fixed Service Provider Q3 2020, complaints closed in 10 days or less versus complaints closed in 11 days or more

5.5 Fixed Service Provider ECS Complaints Open at 30 September 2020

Figure 25 shows the number of ECS complaints open at 30 September 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.

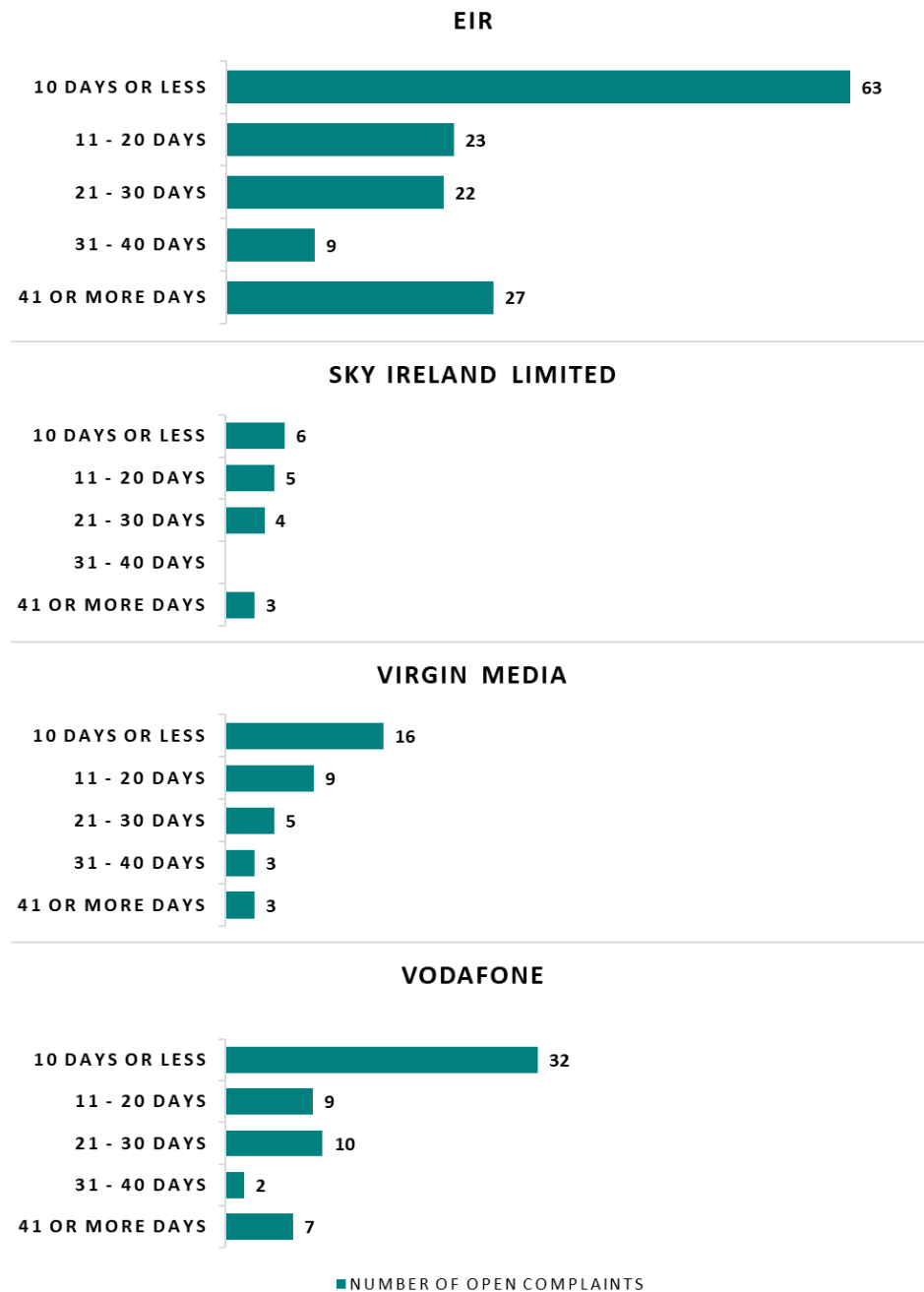


Figure 25: Fixed Service Provider ECS complaints open at 30 September 2020 by number of working days since first escalation

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 Q2 2020 to Q3 2020. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Fixed Service Providers.

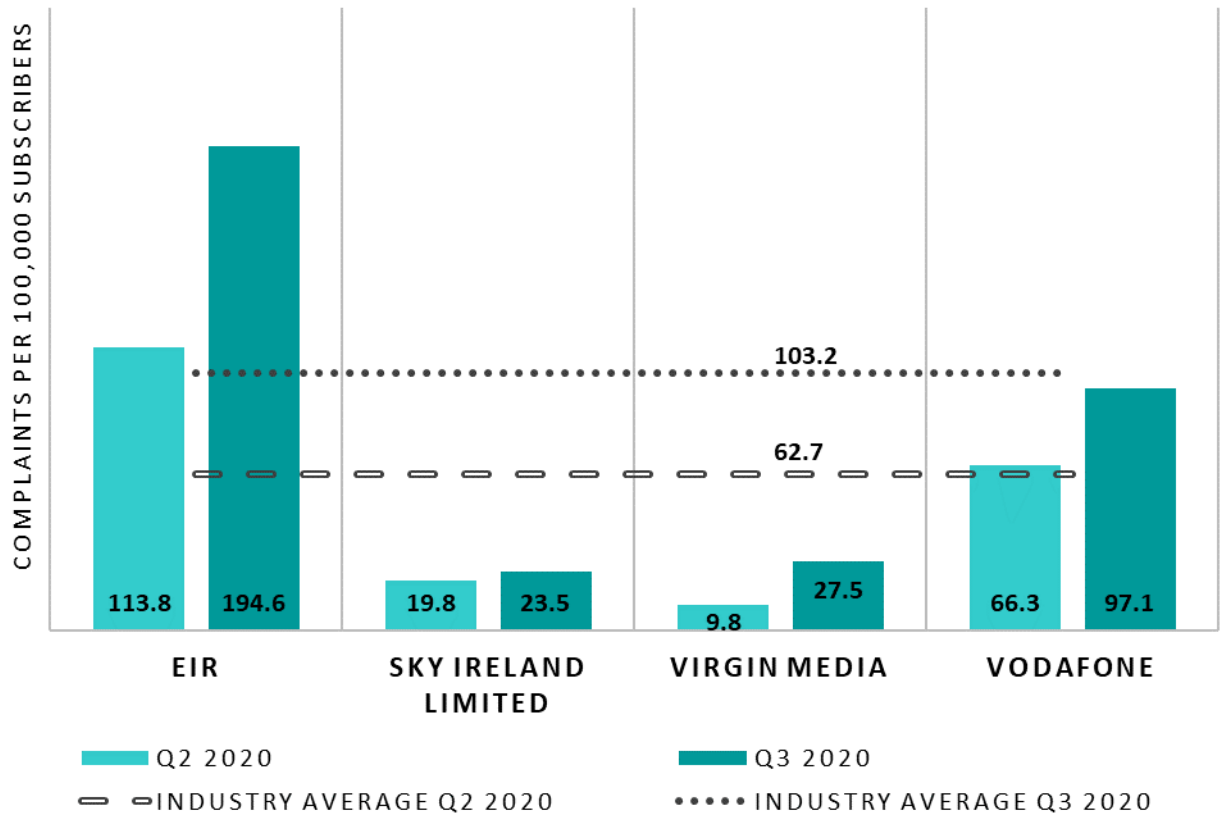


Figure 26: ECS complaints by Fixed Service Provider per 100,000 subscribers Q2 2020 vs Q3 2020

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 Provider⁴ listed in Figure 7, comparing Q2 2020 to Q3 2020.

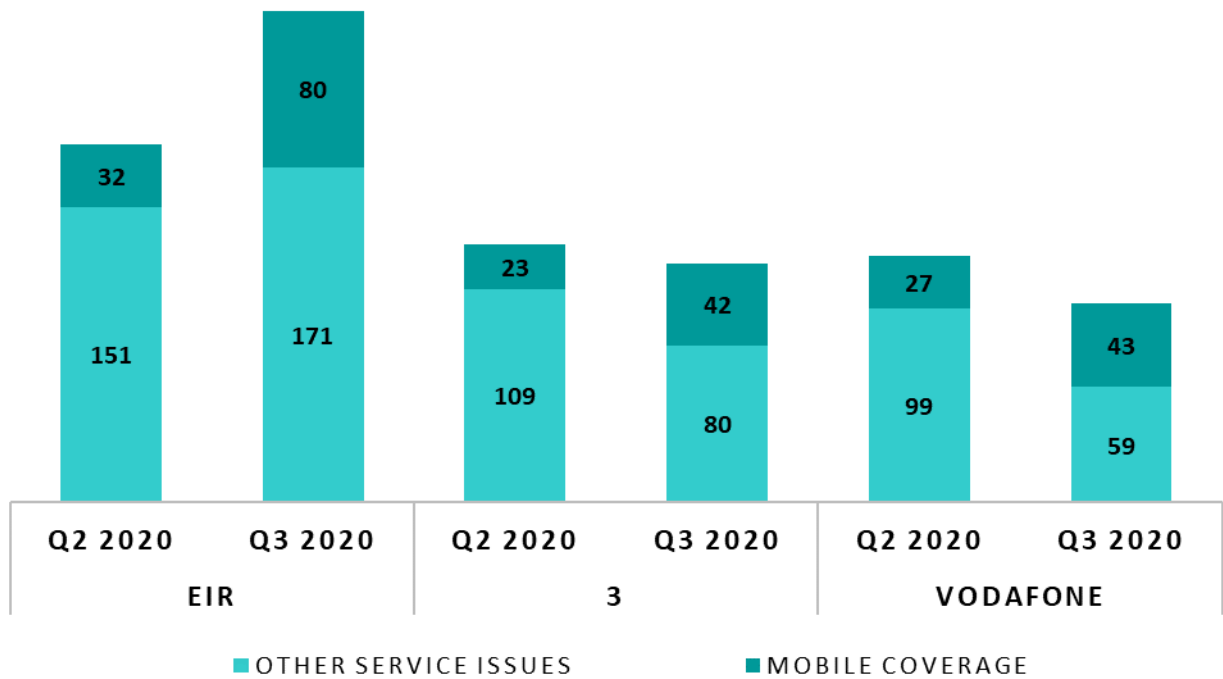
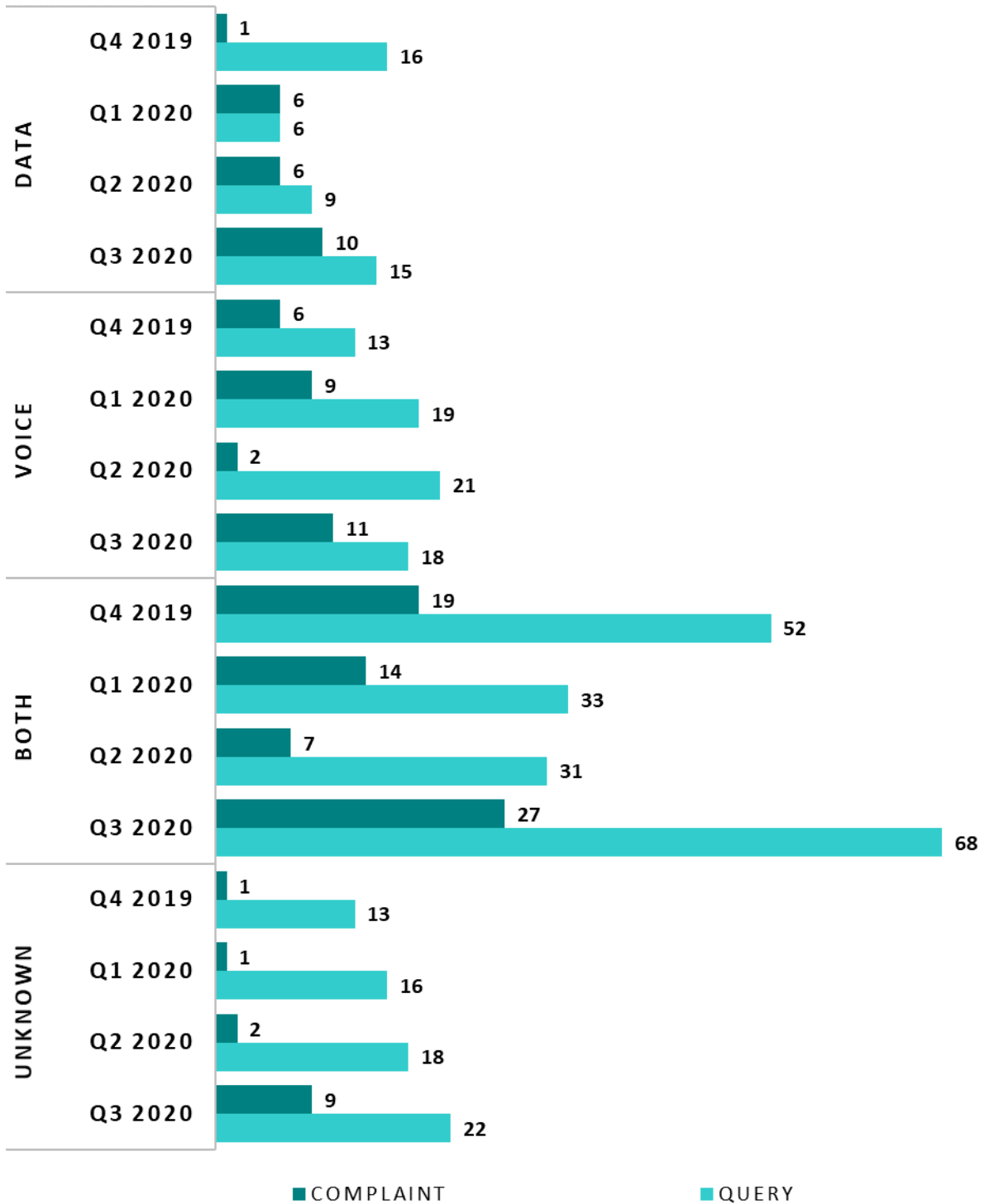


Figure 27: Number of ECS service issues by Mobile Service Provider Q2 2020 vs Q3 2020



*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 Q4 2019 – Q3 2020

Figure 29 shows the average number of mobile coverage issues recorded per 100,000 subscribers for each Mobile Service Provider⁷ listed in Figure 7. The ‘industry average’ is based on mobile coverage issues recorded for all Mobile Service Providers within each quarter.

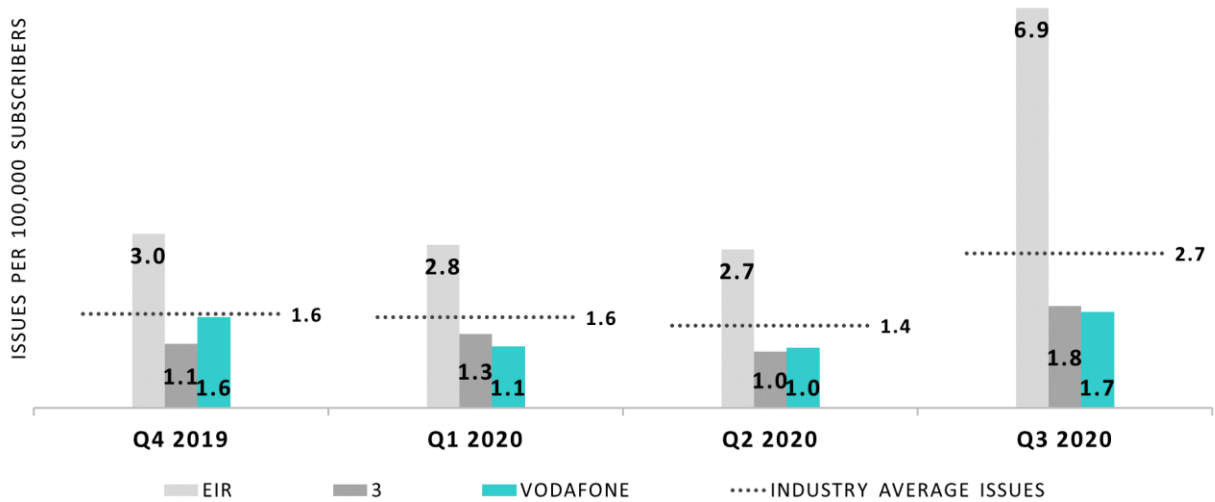


Figure 29: Mobile Coverage issues (per 100,000 Subscribers) Q4 2019 – Q3 2020

⁷ On this chart, issues recorded for GoMo are included in Eir’s figures for Q1 2020, Q2 2020 and Q3 2020.

Annex 3: Classification Type Index

This Classification Type Index reflects the classification and sub-classification types⁸ relevant to highest volume issues recorded in Q3 2020⁹.

<p>Billing includes:</p> <ul style="list-style-type: none"> Billed after cancellation Billed for service not received Billed for service not requested Billed more than agreed amount Credit not applied 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
<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 issues - e-mail 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

⁸ Sub-classification types may vary each quarter based on the nature of issues reported by consumers.

⁹ For detail on classification and sub-classification types relevant to highest volume issues recorded in Q2 2020, see ComReg Consumer Line Statistics Report Q2 2020.

Legal Disclaimer

The information and statistics contained within this document are derived and based on consumer care line recorded information. The Commission for Communications Regulation (“ComReg”) receives queries and complaints on many types of consumer issues in the sector. This document does not constitute commercial or other advice. No warranty, representation or undertaking of any kind, express or implied, is given in relation to the information and statistics contained within this document. To the fullest extent permitted by law, neither ComReg nor any of its employees, servants or agents will be liable for any loss or damage arising out of or in connection with your use of, or any reliance whatsoever placed on this document (including, but not limited to, indirect or consequential loss or damages, loss of income, profit or opportunity, loss of or damage to property and claims of third parties) even if ComReg has been advised of the possibility of such loss or damages or such loss or damages were reasonably foreseeable.