Commission for
Communications Regulation

Consultation Paper

Consultation on Universal Service Performance Targets

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All responses to this consultation should be clearly marked:- "Reference: Submission re ComReg 07/55" as indicated above, and sent by post, facsimile, e-mail or on-line at www.comreg.ie (current consultations), to arrive on or before 7 September 2007, to:

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Please note ComReg will publish all respondents submissions with the Response to this Consultation, subject to the provisions of ComReg's guidelines on the treatment of confidential information – ComReg 05/24

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Foreword

The Universal Service Obligation (USO) is an important part of the regulatory framework, as it ensures that all consumers can obtain an affordable telecoms service. In order for the regulatory framework to function effectively and in a way that benefits end-users, it is vital that the actual performance of the Universal Service Provider (USP) in delivering on this obligation is satisfactory.

One of the most important areas of the USO relates to consumers being provided with a fixed-line telephone service in a reasonable period of time. It is also vital that faults, which will inevitably occur, are limited in number and are repaired speedily. In this paper, ComReg considers the USP's recent performance in both these areas. It is of the preliminary view that while some aspects are satisfactory, performance could be improved in a manner that would give considerable benefits to end-users.

The consultation paper proposes binding targets for the delivery of these obligations. ComReg believes the targets are reasonable and proportionate. Achieving these targets would ensure benefits for end-users, promote greater confidence in the USP and the sector generally and generate ancillary social benefits in terms of end-users finding it easier to access communications services.

Mike Byrne
Chairperson

1 Introduction

About ComReg

1.1 The Commission for Communications Regulation (ComReg) is responsible for the regulation of the Irish electronic communications and the postal sectors in accordance with national and EU legislation.

What is the Universal Service Obligation?

1.2 The Universal Service Obligation (USO) ensures that basic fixed line telephone services are available to end users at an affordable price. There are both social and economic grounds for the USO, including providing services to help vulnerable users and those in remote locations whom the market might otherwise not choose to serve. The USO is also focused on bringing benefits to those with low incomes who have difficulty in affording a telephone service as well as end users with disabilities who need particular services or facilities.

1.3 The scope of universal service is defined by a 2002 EU Directive[1] which was implemented in Ireland by the European Communities (Electronic Communications Networks and Services)(Universal Service and Users' Rights) Regulations 2003 – S.I. No. 308 of 2003. ("The USO Regulations"). In July 2003, Eircom was designated as Universal Service Provider (USP). This designation was repeated in July 2006, with the current term ending in June 2010. The principal obligations[2] which Eircom are to fulfil as USP are

- To satisfy any reasonable request to provide at a fixed location
  - Connections to the public telephone network; and
  - Access to publicly available telephone services.
- Ensure that a comprehensive printed directory of subscribers is made available to all end-users free of charge and is updated at least once in each year;
- Ensure that public pay telephones are provided to meet the reasonable needs of end-users;

[1] Directive 2002/22/EC of the European Parliament and of the Council of 7 March 2002 on universal service and users' rights relating to electronic communications networks and services (O.J. No. L 108 24.4.2002 p.51)

[2] The full details of the USO are set out in ComReg Document 06/32

- Specific Measures for Users with Disabilities including:
  - Compliance with a Code of Practice concerning the provision of services for people with disabilities
  - Provision of a Text Relay Service
  - Provision of a rebate scheme for users of the text relay service
  - Provision of Braille billing free of charge.
  - Provision of Special Directory Enquiry arrangements to allow the use of directory enquiry services free of charge.

USO Quality of Service

1.4 Under Regulation 10 (1) of the USO Regulations, Eircom, as the designated USP, is required to publish information on its performance in relation to the provision of its universal service obligations. This is available on the Eircom website under the heading of "About Us" – "Regulatory Information". The parameters, definitions and measurement methods for such published information is set out in the EU Directive. The quality of service performance indicators are updated on a quarterly basis. As well as Eircom, ComReg also publishes the information, and the latest data set, covering the three-month period to end December 2006, is available at http://www.comreg.ie/_fileupload/publications/ComReg0754.pdf.

Universal Service Requirements

1.5 Under Regulation 3(4) of the USO Regulations, ComReg specified requirements[3] to be complied with in relation to the reasonableness of requests for connections and the minimum data rate which connections were to be capable of providing. Following a public consultation in March 2005, all requests for connections (at no more than the standard connection charge) are to be regarded as reasonable if the expenditure involved in meeting the request is less than €7,000. Requests for connections which involve expenditure in excess of €7,000 are also to be considered reasonable if the applicant agrees to pay the standard connection charge plus the incremental costs above €7,000.

1.6 Eircom is also required to adopt 28.8kbps as the minimum data rate for the purpose of ensuring Functional Internet Access. Where a customer's telephone line is not

[3] ComReg Document 05/70 Universal Service Requirements - Provision of access at a fixed location – connections to public telephone network and provision of functional Internet access

capable of achieving the minimum rate, Eircom is required to use all reasonable endeavours to address the line capability, following a request by a user.

Related Guideline Targets

1.7 The Universal Service Requirements document (ComReg 05/70) also contained guideline targets for both Provision of Fixed Access and Functional Internet Access.

1.8 The targets in relation to requests for connection were as follows:

- 60% of all requests to be met within 4 weeks of request
- 80% of all requests to be met within 8 weeks of request
- 90% of all requests to be met within 13 weeks of request
- 95% of all requests to be met within 26 weeks of request
- 100% of all requests to be met within 52 weeks of request

1.9 In relation to Functional Internet Access, the performance target for total installed telephone lines capable of the minimum data rate of 28.8kbps was set at 94%.

1.10 Under Regulation 10(4) of the USO, ComReg is authorised to set binding performance targets in respect of the obligation to provide connections and access and such other elements of the USO as ComReg deems appropriate. In setting any performance target, ComReg is required to have regard to views expressed in a public consultation. The Regulations also permit ComReg to ensure compliance with performance targets in the event of persistent failure to meet the targets. The main purpose of this consultation paper is to consider the USP's performance in fulfilling its obligations, and to decide whether binding targets need to be set for future performance.

2 Recent Market Developments

2.1 There has been significant growth in housing stock in Ireland in recent years as demand for housing has risen due to population growth as well as significant inward migration. The Department of the Environment reported that over 500,000 homes have been built since 1997 and that 20,018 houses and apartments were completed in the first 3 months of 2007 alone. This equates to over 1,600 new homes every week. The estimated housing demand during the period of the Government's new Housing Policy Statement – Delivery Homes, Sustaining Communities - is for some 600,000 new homes by 2015.

2.2 The growth in housing completions impacts on the USO due to the increase in the number of homes seeking connections to the public switched telephone network (PSTN) and the resulting extension of the network to meet demand and fulfil the USO. Eircom's 2006 annual report states that over 42,000 new homes signed up for Eircom's fixed line service over the year, indicating that Eircom is capable of continuing to supply new homes with fixed line services as the number of homes expands.

2.3 Recent research from the CSO found that around 80% of households in Ireland have a fixed telephone line[4]. In line with trends elsewhere in Europe, an increasing number of households in Ireland are choosing not to take a fixed line for differing reasons. For example, those in rented accommodation are much less likely to have a fixed line as are single-person households. A recent survey commissioned by the European Commission found that 24% of Irish households had access to a mobile phone only, which is higher than the EU average of 22%.[5]

2.4 The high percentage of households who have chosen to take a fixed line, however, indicates that it remains important for a number of reasons. The above-mentioned European Commission survey found that 31% of fixed line households would not give up their fixed line as they are used to it while 23% indicate that they need their fixed line as it provides them with internet access. This is supported by ComReg survey data.

[4] http://www.cso.ie/releasespublications/documents/industry/2006/ictireland2006.pdf

[5] http://ec.europa.eu/information_society/policy/ecomm/doc/info_centre/studies_ext_consult/ecomm_household_study/eb07_finalreport_v4.pdf

2.5 Demand for broadband in Ireland has grown strongly in the past couple of years from a slow start in 2002 when mass-market DSL products were launched by operators. Broadband subscribers grew from around 31,000 at the end of 2003 to over 500,000 by the end of 2006 and ComReg's first quarterly report of 2007[6] shows that current broadband take-up in Ireland is 602,000 subscribers. This broadband growth is above the EU average and is being driven by increased ISP competition at the retail level, falling broadband prices as well as increased bundling of line rental, calls and broadband access. Almost 73% of broadband in Ireland is currently delivered over conventional copper telephone lines i.e. ADSL. The remaining 27% of connections are delivered over cable modem, wireless broadband satellite, and fibre. Average entry-level broadband packages offer between 1 and 2Mb downstream and 128-256kb upstream.

[6] Irish Communications Market: Quarterly Key Data – June 2007 (ComReg 07/34)

3 Provision of Access at a Fixed Location

Eircom's obligations

3.1 Eircom is required to satisfy any reasonable request to provide a connection to the public telephone network. Each connection must be able to make local, national and international telephone calls, facsimile communications and data communications at a data rate sufficient to permit Functional Internet Access (minimum target rate 28.8kbps).

Recent Analysis of Performance

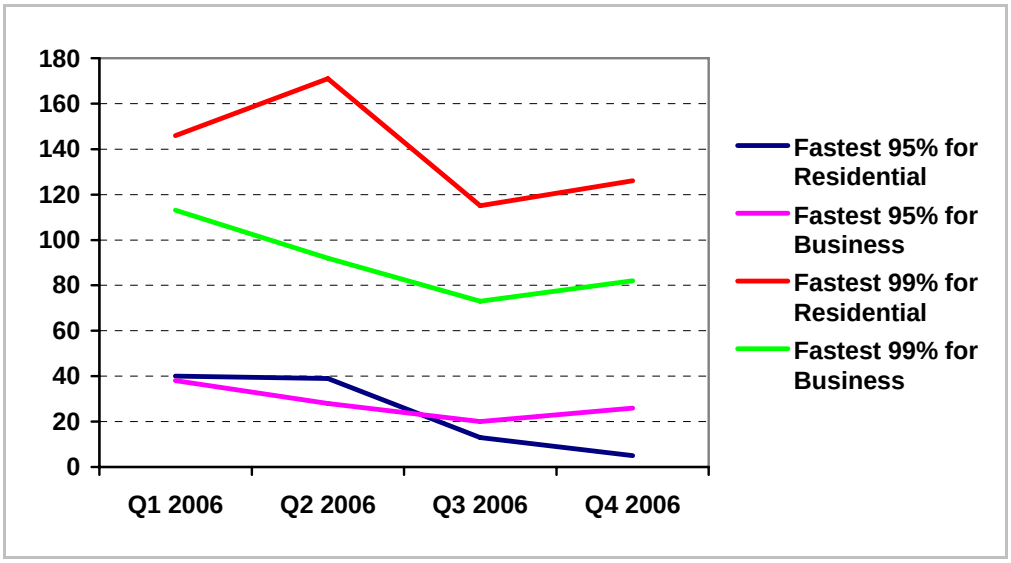
3.2 The following table shows the time distribution of connections to the network during 2006

Table 3.1 Age profile of completed connections

	Q1 2006		Q2 2006		Q3 2006		Q4 2006	
	Res.	Bus.	Res.	Bus.	Res.	Bus.	Res.	Bus.
Less than 4 weeks	93.85%	91.98%	93.93%	94.20%	96.56%	95.23%	97.47%	95.10%
4 – 8 weeks	96.09%	96.10%	96.16%	97.45%	98.01%	98.21%	98.66%	97.85%
8 – 13 weeks	97.67%	98.22%	97.52%	98.72%	98.73%	99.13%	99.32%	99.13%
13 – 26 weeks	99.43%	99.61%	99.14%	99.56%	99.48%	99.67%	99.84%	99.79%
26 – 52 weeks	99.94%	99.95%	99.85%	99.92%	99.90%	99.95%	100.00%	100.00%

3.3 As can be seen, the overwhelming majority of connections are made within 4 weeks of a request being made. Performance in the residential sector is marginally better than in respect of requests from business users. However, while the percentages are small, there are a number of requests which take more than 6 months to complete, including a small number which take over 1 year.

Fig 3.1 – Fastest time taken for connections in elapsed days



3.4 Fig 3.1 above illustrates the actual time taken to complete the majority of connections. As with the data in Table 3.1, this illustrates that performance has improved by Q4 2006 compared to the start of the year. However, aside from the "Fastest 95% for Residential" metric, there is an actual decline in performance (using this metric) in all other areas between Q3 and Q4.

3.5 An important performance indicator is the percentages of installations completed by the date agreed with the customer. In many cases, customers are required to allow Eircom staff access to the premises. In the residential sector, this involves the customer making special arrangements to be present. If the appointment is not kept, or if the work is not completed during the appointment, a further visit is frequently necessary and the customer is therefore inconvenienced, in addition to not having the expected telephone service. The following table shows the percentages of connections that were completed by the date agreed with the customer.

Table 3.2 – Percentage of customer installations completed by agreed date

	Q1 2006	Q2 2006	Q3 2006	Q4 2006
Residential	88%	86%	89%	92%
Business	78%	81%	82%	83%

Categories of connections

3.6 A full statement of the categories of connections and Eircom's processes for meeting orders for such connections is available on Eircom's website at http://www.eircom.ie/bveircom/pdf/USO_statment_07_2006.pdf. A distinction is made between connections which can be electronically enabled and those where varying degrees of technical work is required. As part of the Guidelines issued in ComReg Document 05/70, all applicants for service should be informed of the timeframe within which the order will be met, or where this is not possible because further investigations are necessary, the timescale within which this will be completed. In such cases, the applicant should be able to receive or access information on the progress of their application.

Assessment of performance

3.7 As can be seen from the data above, in 2005 ComReg established guideline targets for meeting requests and, for the most part, these have been met. However, a particular difficulty relates to the last 5% of applications. This segment is still taking a considerable period of time to connect as can be seen in the graph at Fig 3.1., and a small number of consumers are waiting an unreasonably long time to be connected. This leads to considerable inconvenience and loss for such consumers.

3.8 The current targets are purely guidelines. In order to improve performance, particularly relating to the last 5% of applications which are met, it is considered appropriate to establish statutory performance targets, which will permit enforcement action in the case of "persistent failure to meet performance targets[7]". The possibility of enforcement action can act as an incentive for the USP to develop strategies to improve its record of meeting requests for connection.

Q. 1. Do you agree that the establishment of binding performance is justified? Please state views.

ComReg's Proposed Performance Targets

3.9 ComReg notes the need to differentiate between connections which can be electronically enabled and those which can not.

[7] Statutory Instrument No. 308 of 2003, Regulation 10 (6)

3.10 "In-situ" refers to the electronic enablement of a line so as to make it usable to the consumer. A callout to the premises is not needed as the activation of the line is done remotely. In practice, it should take no more than a working day to activate such a connection and Eircom's own provisioning statement states that this will be done on the same day of the request being made.

3.11 A 'first time connection' means that Eircom will have to physically make a connection to an exchange. This may include a new line being laid during the connection process. The time taken on the process depends on where the customer is located, whether a network extension is necessary, the degree of civil works required and the process of obtaining consents from road and planning authorities and private landowners.

3.12 A 'reconnection' involves less work than first time connection. While a physical line may exist at the premises, because of previous disconnection, the connection back to the telephone exchange may be incomplete.

3.13 As the processes for in-situ and other connections are significantly different in execution and duration, ComReg proposes that separate performance targets be set for both types of connections. ComReg proposes a performance target for in-situ connections to a maximum of 24 hours. This should be seen as reasonable since a PSTN line can be activated remotely and Eircom are already committed to this.

3.14 ComReg proposes the following performance targets for first-time connection (reconnection included):

- *80% of all requests to be met within 2 weeks of request*
- *85% of all requests to be met within 4 weeks of request*
- *90% of all requests to be met within 8 weeks of request*
- *95% of all requests to be met within 13 weeks of request*
- *All requests to be met within 26 weeks of request.*

3.15 The point from which the duration is calculated shall be when the applicant accepts the terms and conditions for the provision of service and enters into a contract. Based on the different methods available to apply for provision (post, online, telephone), a reasonable time allowance should be considered for delivery and processing before entering into the contract stage. For example, applying online or over the telephone

would eradicate the delivery time leaving only the processing stage compared to the delivery time taken for normal post.

3.16 In the case of applications which require the applicant to pay connection fees in excess of the standard fee, this shall be the date where the applicant agrees to pay the excess charge.

3.17 ComReg also proposes that a *target of 90% be set for "percentage of installations completed by agreed date*".

Q. 2. What are your views on the establishment of different performance targets that could be established for in-situ connection and first time connections?

Q. 3. What are your views on the values proposed for the performance targets?

4 Reported Faults and Repairs

What Eircom is obliged to do?

4.1 The previous section dealt with one part of the basic obligation under USO – the obligation to provide a connection. The other part of the obligation is to provide access to publicly available telephone services. The regulations require that the connection is to be capable of allowing the end user to make and receive telephone calls, fax communications and data communications. In order for the obligation for both connection and access to be met, the underlying network must be fit for purpose. The level of faults reported by end users is an indicator that that this may not be the case.

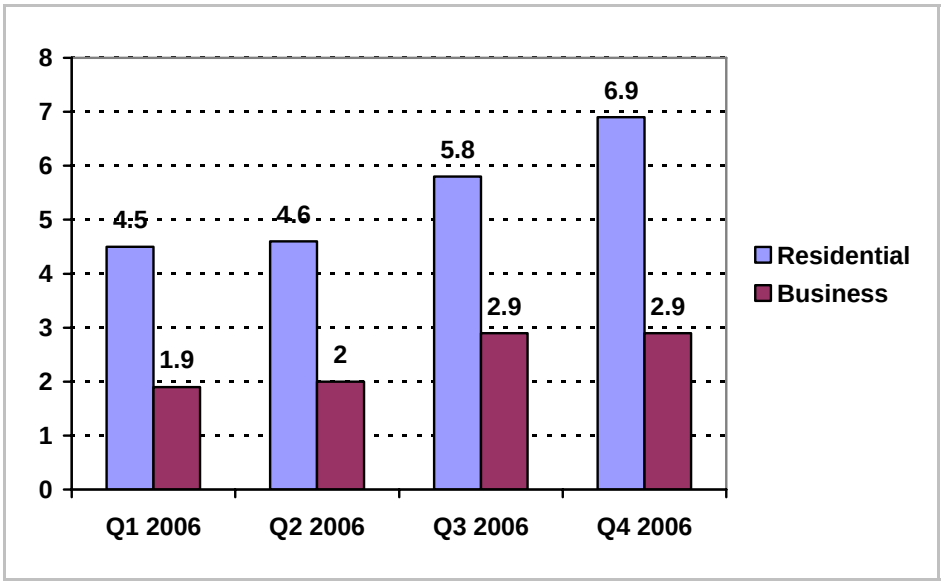
Why set performance targets?

4.2 ComReg recognises that faults will occur from time to time. However, if a fault is not repaired quickly it can lead to considerable negative impacts on affected consumers. It is therefore important that the USP keeps to a high performance standard in repairing faults. As can be seen below, performance is not consistently at that level, and it is evident that a binding performance target should be considered to provide appropriate incentives to the USP.

Recent Analysis of Performance

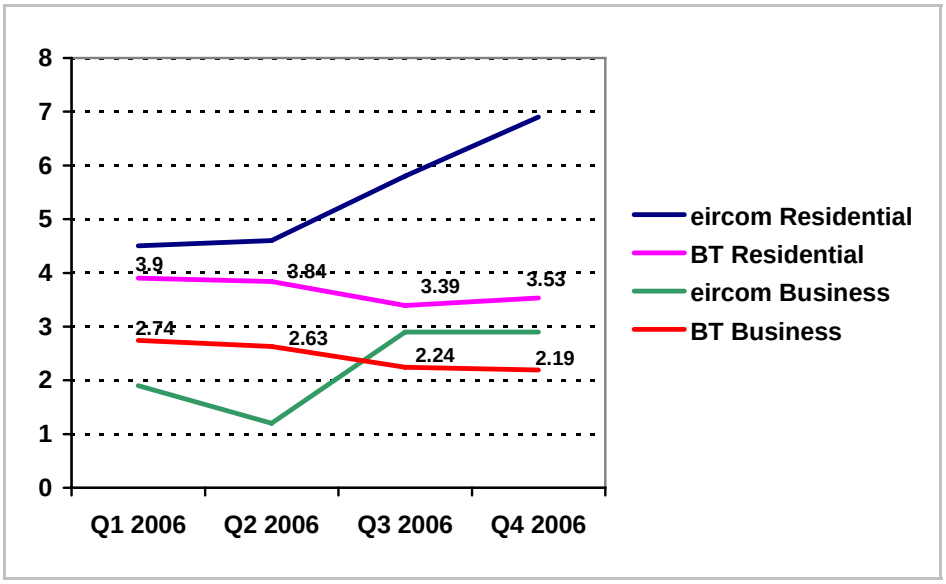
4.3 Over the four quarters of 2006, the number of reported faults has increased dramatically. The Residential fault rate has increased from 4.5 faults per 100 lines in Q1 to 6.9 faults per 100 lines by Q4. The rate of fault reporting by business end-users rose by a similar 50% from 1.9 to 2.9 per 100 lines over the same period. Eircom has stated that the reason for the spike in the fourth quarter was due to adverse weather conditions during that quarter but the trend has been for a continuous increase in fault reporting as can be seen in Fig 4.1 below.

Fig 4.1 – Eircom's fault rate per 100 lines for 2006



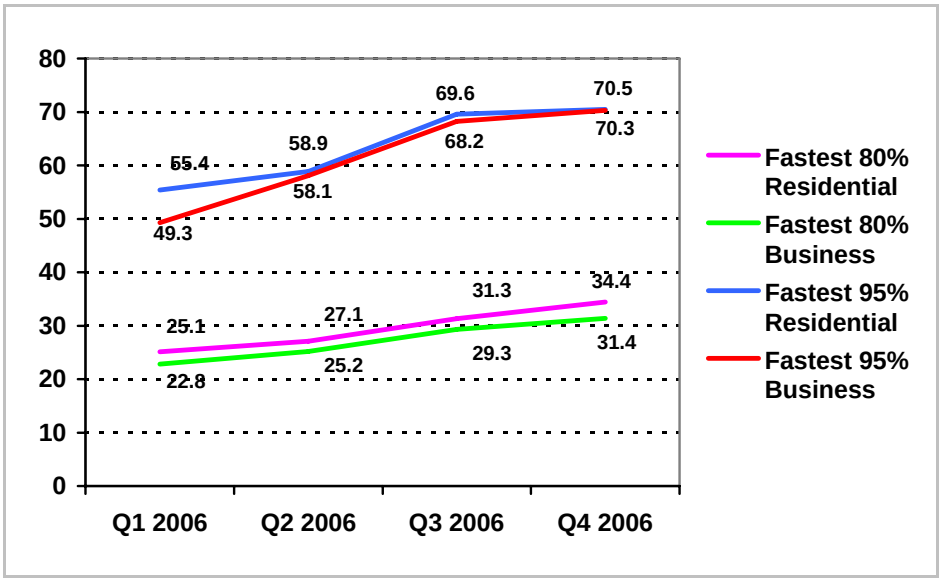
4.4 Fig 4.2 illustrates a comparison with Eircom and BT in the UK. Although faults are quite high for Eircom Residential, Eircom Business rises slightly above BT Business between Q1 and Q4 2006. Both Eircom and BT UK use the ETSI standard when calculating fault occurrences.

Fig 4.2 – Comparison of Eircom and BT UK faults per 100 lines (BT figures provided on the graph)



4.5 Fig 4.3 below displays the fastest time taken to repair faults during 2006. The time taken to repair a fault is calculated by subtracting the time that Eircom confirm a fault to the time the fault is repaired.

Fig 4.3 – Fastest time taken to repair faults (in working hours)



ComReg's Proposed Performance Targets

4.6 The non-availability of a working telephone service due to the late repair of faults is, at minimum, a source of irritation for end-users. In some cases, i.e. elderly, lone occupancy or other vulnerable users, non-availability of a telephone service can have more serious consequences. There are also circumstances where non-telephone services such as broadband, monitored alarms for both property and persons or satellite television depend on the continuous availability of a telephone service. This is also a major issue for businesses, as being temporarily unavailable can negatively effect customer perception of the business.

4.7 Based on an assessment of the current record in faults and repair, ComReg believes that performance targets are required. The number of faults reported in 2006 (as illustrated in Fig 4.1) cannot be regarded as being within reasonable limits. ComReg believes that a static performance target may not be appropriate and that performance targets should be established to reflect the expectation that service quality should improve over time. ComReg notes that over the last three years,

Eircom's average level of fault repair was close to 15 faults per 100 lines. That would seem to be a reasonable starting point for the end of 2007, which should be a basis for improved performance over time. ComReg is of the view that a target of 13.5 faults per 100 lines by the end of 2008 would constitute a reasonable target, and would not be excessively harsh by comparison with the UK and the initial level. Further improvement to a level of 12.5 faults per 100 lines by the end of 2009 would also seem appropriate.

4.8 Thus, having considered Eircom's level of faults for the years 2004/05 – 2006/07, actual performance by BT in the UK and Eircom's current plans, ComReg proposes the following three-stage target for the maximum number of fault reports arising:

- *15 faults per 100 lines (3.75 faults per quarter) to be met by the end of 2007*
- *13.5 faults per 100 lines (3.375 faults per quarter) to be met by the end of 2008*
- *12.5 faults per 100 lines (3.125 faults per quarter) to be met by the end of 2009*

Q. 4. What are your views on the proposed targets for fault occurrence?

Fault Repair Timescales

4.9 As faults will inevitably occur, the imperative for affected end-users is to have service restored as speedily as possible. The ability of Eircom to attend to fault repairs will be affected by a number of factors but chiefly by the volume of faults which require attention. Notwithstanding the total faults which arise, ComReg believes that it is appropriate that end-users have a realistic service commitment. Currently, Eircom's customer guarantee is to attend to faults within 2 working days subject to a number of exceptions. ComReg believes that the restriction to attending to faults during working days is not reasonable when the service is used by end users on a continual basis. ComReg therefore is proposing that targets for fault repair be expressed in calendar day calculated from the day after the fault is reported.

- *80% of fault repairs to be competed within 2 calendar days*
- *95% of fault repairs to be completed within 4 calendar days*

- *100% of fault repairs to be completed within 7 calendar days*
- *90% of faults to be repaired by the time agreed with the customer*

Q. 5. What are your views on the proposed targets for repair times?

5 Functional Internet Access

5.1 Functional Internet Access refers to the data rate a line must be capable of in order to connect to the internet. The target speed is currently 28.8kbps

Analysis of Current Performance

5.2 As mentioned before, the guideline target for functional internet access is 94% of lines to be capable of achieving the target data rate or better. Over the course of 2006 Eircom have roughly managed to achieve this. If this target was to increase, ComReg believes that there would be a danger of over concentration on this issue with a consequent loss of focus on the continuing broadband rollout. As such, ComReg does not propose to specify binding targets for this issue.

6 Public Payphones

Analysis of Current Performance

6.1 A working payphone is defined as being capable of making and receiving national, international and emergency calls. Over the last 3 quarters of 2006, 90% of payphones were in working order (see Table 6.1 below).

Table 6.1 – USO Payphones in working order for 2006

	Q1 2006	Q2 2006	Q3 2006	Q4 2006
USO payphones in full working order	86.75%	90.09%	90.28%	90.18%

6.2 There has been some improvement in performance over the last year. ComReg is currently of the view that there no evidence to suggest that performance is failing to meet the needs of end-users. As such, it does not propose to set binding targets in this area.

7 Regulatory Impact Assessment – RIA

7.1 ComReg is required to conduct a regulatory impact assessment (RIA) on any obligations it places on operators. This section analyses the potential impact of the proposed performance targets on Eircom, other competition, and the consumer.

Effects on Eircom

7.2 First, it should be noted that binding targets are only proposed in relation to provision of access and fault repair, rather than the full suite of USO obligations. ComReg is aware of the need to be proportionate, and its proposed targets are focussed on the areas where it believes consumers are most affected.

7.3 Secondly, if performance targets are put in place, even just for faults and repairs, it is possible that there could be costs in reaching such targets. Costs may involve a change in work practices, upgrades in infrastructure or even hiring additional staff. However, the USP should reach a basic level of quality in its provision of service. ComReg is of the initial view that, should Eircom feel that these costs are likely to be excessive, they should be in a position to supply ComReg with clear, unbiased data as to such costs during the consultation period.

7.4 Thirdly, under the USO provisions, the Universal Service Provider may apply for funding if complying with its obligations becomes an unfair financial burden. If the costs of these proposed measures are high, then they could be considered within the overall calculation of whether the USO constitutes an unfair burden

7.5 ComReg would point out that, should performance in these areas improve, Eircom will generate considerable benefits. First, as discussed above, consumers appear to be dissatisfied with the current level of performance. An improvement in this should generate greater consumer goodwill towards Eircom, with consequent improvement in their brand value. Secondly, faster delivery of installations will generate more customers and consequently more revenue for Eircom. Thirdly, if the speed of installs and fault repairs is increased, extra revenue should be achieved from customers actually using the service. Indeed, stronger consumer confidence in the speed of installation could lead to a greater demand for fixed-line services generally.

Effects on Other Authorised Operators - OAOs

7.6 If Eircom meet the performance targets proposed in this document, the network infrastructure should improve and thus improve the competitive situation not just for

Eircom Retail but for all fixed-line operators. In particular, the issue of fault repair has considerable relevance for OAOs using Eircom's network, as poor performance in repairing faults can negatively affect such OAOs. As such, the proposed targets should generate considerable benefits for OAOs.

Effects on Consumers

7.7 A public telephone network that sees significant delays in installations and delays in repairing faults is not functioning effectively, and is not performing the basic functions of the USO, which is to ensure all consumers have convenient and affordable telephone services. Improving the efficiency of the network will have a positive societal impact, as consumers will be able to access services more rapidly and efficiently. This will be of particular benefit to consumers who live in more isolated areas, where there may be long delays in installation. For instance, a consumer who is waiting six months for a phone line for which he/she is willing to pay roughly €50 a month for access and calls is losing €300 of benefit through the delay. Improving installation delivery to, say, two months, will generate €200 benefits for the consumer. If one considers these numbers for, say, 50,000 consumers then that translates into at least €10 million improvement in consumer welfare. ComReg is of the preliminary view that any costs to Eircom, even when considered in the absence of the benefits to Eircom discussed above, are unlikely to be of that level.

7.8 In terms of fault occurrence and fault repair, improved performance in these areas will also improve customer welfare. For instance, if we assume an improvement in fault occurrence from 15 per 100 lines to 12.5 per 100 lines, and use a base of 1.7 million fixed lines, this implies a lowering in the number of yearly faults by 42,500. Given the genuine inconvenience associated with having one's fixed-line unavailable, particularly for older and vulnerable users, and for businesses, this would represent a considerable improvement in welfare. If each user affected was to gain €30 (which is a very conservative estimate of the benefit to some users) from not having a fault, it would amount to an improvement in welfare of nearly €1.3 million.

7.9 An improvement in fault repair times would also generate benefits for consumers. If one assumes an overall level of faults of 15 per 100 lines, then this implies roughly 255,000 faults per year. Even moving from an average of 2 days to repair to 1 day to

repair, and assuming a benefit to each user affected of €10, produces a consumer gain of over €2.5 million.

7.10 Note that ComReg is of the view that most of these estimates are relatively conservative, and probably under-estimate the benefits to be achieved. Note also that it does not include estimates of the wider "societal" benefit to be achieved by increasing consumer access to communications and information, and thus allow them to participate more effectively in society. As such, the overall consumer benefits to be reached are likely to be very high, and to justify a set of targets which are not excessive, both in terms of current performance and general EU standards.

8 Submitting Comments

8.1 All comments are welcome; however it would make the task of analysing responses easier if comments were referenced to the relevant question numbers from this document.

8.2 The consultation period will run from 1 August 2007 to 7 September 2007 during which the Commission will welcome written comments on any of the issues raised in this paper.

8.3 Having analysed and considered the comments received, ComReg will review the proposals and publish a report in November 2007 on the consultation which will, inter alia summarise the responses to the consultation.

8.4 In order to promote further openness and transparency ComReg will publish all respondents' submissions to this consultation, subject to the provisions of ComReg's guidelines on the treatment of confidential information – ComReg 05/24

Please note

8.5 ComReg appreciates that some of the issues raised in this paper may require respondents to provide confidential information if their comments are to be meaningful.

8.6 As it is ComReg's policy to make all responses available on its web-site and for inspection generally, respondents to consultations are requested to clearly identify confidential material and place confidential material in a separate annex to their response

8.7 Such information will be treated subject to the provisions of ComReg's guidelines on the treatment of confidential information – ComReg 05/24

Appendix A – Consultation Questions

List of Questions