



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Information Notice

Eircom's request to withdraw access to
Integrated Services Digital Network (ISDN)
Basic Rate Access (BRA)

Information Notice

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Date: 09/12/2020

An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

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Additional Information

Document No:	20/118
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1. On 6 April 2020, Eircom requested ComReg's approval to withdraw access to Integrated Services Digital Network ('**ISDN**') Basic Rate Access ('**BRA**') services,¹ as follows:
 - (a) end of sale for new ISDN BRA services from 30 January 2021 and
 - (b) the withdrawal of access to ISDN BRA services on 31 December 2024.
2. On 27 May 2020, Eircom requested that ComReg consider additional information it omitted from its request on 6 April 2020.²
3. On 7 October 2020, ComReg refused Eircom's request to withdraw access to ISDN BRA services,³ on the basis that Eircom had not demonstrated to ComReg's satisfaction that it is no longer feasible for Eircom to meet access requests for ISDN BRA services as mandated in ComReg Decision D05/15.⁴

¹ See Appendix 1.

² See Appendix 2.

³ See Appendix 3.

⁴ ComReg Decision No. D05/15, Market Review - Wholesale Fixed Voice Call Origination and Transit Markets. Response to Consultation and Decision, ComReg Document 15/82, 24 July 2015.

Appendix 1: Eircom's request to withdraw access to ISDN BRA services (6 April 2020)

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Request to withdraw access: Integrated Services Digital Network (ISDN) Basic Rate Access (BRA)

6th April 2020

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Contents

1. Background 3

2. Request 3

3. Relevant considerations..... 3

4. Engagement to date..... 3

5. Next steps 4

Appendix 1: CRD 645..... 5

Appendix 2: Collateral shared with Industry 6

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1. Background

open eir identified a need to withdraw the ISDN BRA service (CRD 645 refers). open eir has engaged with ComReg and Industry on its proposals and now wishes to formally request ComReg's consent to withdraw the service.

2. Request

In accordance with Section 7.5(ii) of the Fixed Access and Call Origination Decision, D05/15 (ComReg 15/82), Eircom shall *"not withdraw Access to facilities already granted without the prior approval of ComReg and in accordance with terms and conditions as may be determined by ComReg"*.

Eircom (trading as open eir) hereby requests ComReg's approval to withdraw Access to ISDN BRA in a phased manner as follows:

- End of sale for new ISDN BRA lines from 30th January 2021. Assurance on existing links will continue subject to availability of sufficient stock of terminal adapter equipment.
- open eir's customers will have a four year period to manage the continued decline in demand for ISDN BRA and migrate end users to alternative services, such as self-supplied IP based voice services or open eir's SB-WLR, as appropriate.
- Withdrawal of Access for ISDN BRA on 31st December 2024. From this date any active ISDN BRA lines will be terminated. open eir will operate an information campaign to its wholesale customers encouraging them to migrate from ISDN BRA. The campaign will ramp up in the final year.

3. Relevant considerations

There are a number of factors that inform open eir's request to withdraw the ISDN BRA service:

- There is an ongoing decline in demand for the service.
- open eir is separately progressing a network modernisation programme to deploy MSAN (Multi-Service Access Node) technology in the copper access network to prolong the life of PSTN style voice services. The MSAN solution will not support the provision of ISDN BRA services.
- Equipment suppliers have globally ceased production of ISDN BRA terminal adapters. open eir has a finite supply of these terminal adapters. open eir believes it has sufficient stock of terminal adapters to support the service for the time period proposed in section 2. Stock levels and the longevity of product support will be monitored.

4. Engagement to date

open eir has transparently engaged with ComReg and Industry on this matter.

The first presentation was made to ComReg on 21st May 2019. The proposal was presented to open eir's wholesale customers and their resellers at the open eir Product Development Workshop (PDW) on 29th May 2020. open eir sought feedback on the proposals and no objections were raised. The subject matter was covered in subsequent Industry engagement at the PDWs on 13th November

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2019, 11th December 2019, and the Network Modernisation Technical Workshop on 29th January 2020.

5. Next steps

Assuming ComReg's consent is granted, open eir will formally notify ComReg and Industry of the commencement of withdrawal of service in accordance with its transparency obligations. The notification will take the form of an amendment to the RIO Price List to insert the following text:

"NOTE: ISDN BRA End of Sale:

- 1. No processing of new ISDN BRA sales after 30th January 2021.*
- 2. After the end of sale date, 30th January 2021, no new provides, moves or change orders will be processed.*
- 3. Changes to ancillary services after the end of sale date will still be enabled i.e hunt group can be added and amended for in-situ ISDN BRA. These orders will be processed during the transition period up to the end of life date.*
- 4. On 31st December 2024 the ISDN BRA product will have reached end of life and will be withdrawn."*

The contractual documents will be updated with the removal of the product and notified to wholesale customers in advance of end of life in accordance with prevailing regulatory and/or contractual obligations.

Should ComReg require more information in support of this request please contact:

[REDACTED]

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Appendix 1: CRD 645

CRD

Customer Requirements Document



CRD Reference Information (Internal Use Only)							
PCRL Title	ISDN BRA - End of Sale						
PCRL ID	CRD 645						
Current Status	Development						
Sub Status	In Flight Request						
Product Lead	[REDACTED]						
Status	Request	Concept	Scope	Planning	Development	Delivery	Closure
Date Achieved	21/05/2019	11/06/2019	09/07/2019	21/11/2019	Click here to enter a date.	Click here to enter a date.	Click here to enter a date.

Section 1 – ‘Request Details’	– To be completed by Operators/Service Providers
Section 2 – ‘Customer Solution’	– To be completed by open eir
Section 3 – ‘Document Change Control’	– To be completed by open eir

Section 1 – Request Details (Operators/Service Providers)

Requestor	open eir
Request Description	<p>Subject to regulatory approval, this request is to communicate a proposed end of sale and eventual retirement of the Basic Rate Access (BRA) ISDN service from open eir as follows;</p> <ul style="list-style-type: none"> Proposed Industry update at PDW 29th May'19 Seek industry feedback Proposed change to Reference Offer to show an End-of-Sale for ISDN BRA service from 1st January 2021 ISDN (BRA) to remain commercially available – no changes to current proposition; however no processing of new sales from end of sale date 1st January 2021 (subject to regulatory approval) Proposed End-of-Life for ISDN BRA; only Cease orders processed from 31/12/24 from end of life date (subject to regulatory approval)
Benefits	The proposed end of sale notification will provide 18 months' notice
Relative Priority	N/A
Forecast	The drivers for the end-of-sale are because the product has reached end-of-life and there is no growth for this product within the market. In addition, open eir have a finite supply of terminal adapters and the manufacturer will have ceased global production of terminal adapters to support the ISDN BRA product.



Customer Requirements Document



Please note the completed document should be approved by the operator/service provider, before being submitted via email to rapcustomerrequirements@openeir.ie.
This document will be published on the open eir RAP Customer Portal, <https://www.openeir.ie/rap-customer-portal/> once the requirement is accepted and deemed a change to a RAP product. Any commercially-sensitive information will be redacted before this document is published to the portal.

Section 2 – Customer Solution (Internal Use Only)

Category	Retirement
Relevant Market	Wholesale Fixed Access and Call Origination (e.g. PSTN / SB-WLR / ISDN)
Confirmation Date	10/06/19
<p>Concept HLC 10/6/18 update: open eir wish to withdraw ISDN BRA services at the earliest opportunity, due resource constraints and a reduced demand for the product which is reaching end-of-life. There is no growth in sales for ISDN BRA and open eir have a finite supply of terminal adapters. In addition the manufacturer of the NT1 terminal adapter has advised that global production will be ceased due to lack of projected demand internationally.</p> <p>Therefore, a proposed end of sale and eventual product retirement of the Basic Rate Access (BRA) ISDN service, (subject to regulatory approval) will be implemented as follows;</p> <ul style="list-style-type: none"> • Proposed Industry update at PDW 29th May'19 - Completed • Seek industry feedback – Requested at PDW on 29th May'19 • Proposal to be included within Reference Offer price list documentation showing an End-of-Sale of ISDN BRA service, effective from 30th January 2021 – proposed documentation expected to be notified in June'19 • During the transition period (Jan 2021-Dec 2024) it is proposed that; <ul style="list-style-type: none"> - no processing of new ISDN BRA sales after 30th January 2021 - after the end of sale date no new provides, moves or change orders will be processed - changes to ancillary services i.e hunt group can be added and amended for in-situ ISDN BRA, these orders will still be processed during the transition period - on 31/12/24 the ISDN BRA product should have reached end of life and will be withdrawn. <p>Scope 9/7/19: Reference offer to be updated with end of sale on BRA ISDN effective when regulatory notification period has elapsed. Proposed end of sale is Jan 30th 2021 for ISDN BRA and High Speed. No further sales (Provide/Move or Upgrade from Hi Speed to ISDN) will be implemented after this date. It will still be possible to order or change hunt group blocks and add or remove ancillary services during the transition period once the end of sale date has been implemented. The only feedback from industry was to clarify if Hi Speed upgrades were in scope and if there would be any exception for manual handling of orders. There are no plans to provide manual exception handling for orders in the transition period after the end of sale effective date; subject to regulatory approval this will be Jan 30th 2021. During the planning phase open eir will produce the necessary documentation for regulatory publication and notification.</p> <p>21/11/2019 – Status update to Development: Proposed end of sale date of Jan 30th 2021 for ISDN BRA and High Speed is now progressing to the Development stage. The proposed end of sale date remains subject to regulatory approval.</p> <p>Planned Notification Date: TBC Planned Launch Date:30/01/2021</p>	

CRD**Customer Requirements Document****Section 3 – Document Change Control (Internal Use Only)**

Version	Request update	Status	Date
1.0	Access Request to retire ISDN BRA	Concept	21/05/2019
2.0	Concept HLC	Scope	11/06/2019
3.0	Scope defined	Planning	09/07/2019
4.0	Status updated to Development	Development	21/11/2019

Appendix 2: Collateral shared with Industry

PDW 29th May 2020



ID 645 – ISDN BRA - End of Sale

The drivers for the end-of-sale are because the product has reached end-of-life and there is no growth for this product within the market. In addition, open eir have a finite supply of terminal adapters and the manufacturer will have ceased global production of terminal adapters to support the ISDN BRA product.

Subject to regulatory approval, this request is to communicate a proposed end of sale and eventual retirement of the Basic Rate Access (BRA) ISDN service from open eir as follows;

- Proposed Industry update today
- Seek industry feedback
- Proposed change to Reference Offer to show an End-of-Sale for ISDN BRA service from 1st January 2021
- ISDN (BRA) to remain available – no changes to current proposition; however no new orders after end of sale date 1st January 2021 (subject to regulatory approval)
- Proposed End-of-Life for ISDN BRA 31/12/24 (subject to regulatory approval)

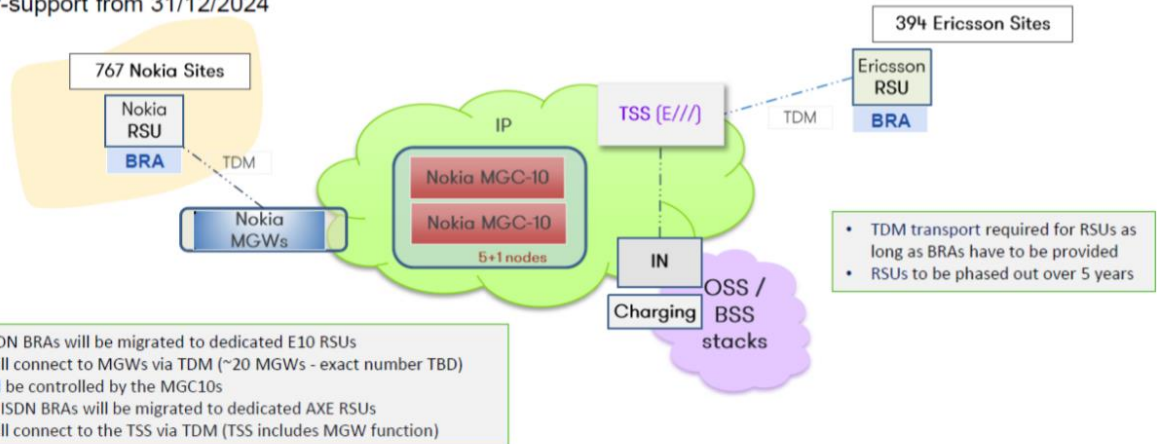
6 |

PDW 13th November 2019 (included in broader network modernisation update)



ISDN - BRA Solution

- Intel’s ISDN BRA chips were discontinued in 2015 and as a result equipment vendors are no longer supplying BRA equipment
- We propose to address BRAs by retaining a minimal amount of RSU equipment in each site for *working* BRAs only
- In parallel, open eir have engaged with Industry to agree end-of-sale dates for ISDN-BRAs from 01/01/2021, and end-of-support from 31/12/2024



PDW 11th December 2019

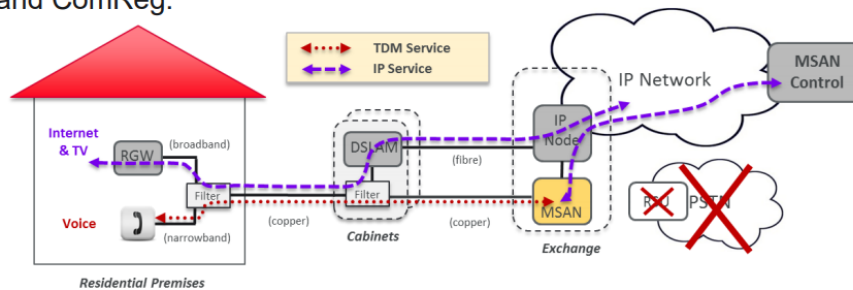
CRD 699 – Network Modernisation Phase 1



The open eir PSTN network is approaching end of life and so open eir will modernise the PSTN network using MSAN technology (Multi Service Access Node)

- This approach should have minimal disruption to end-user services with the exception of ISDN BRA and Electronic Enablement. It is envisaged that all PSTN services will operate normally and there will be no changes required to end user in-home wiring or phone sets.
- open eir are planning to implement this technology from mid 2020 to end 2023 following lab and field trials, subject to regulatory approval
- open eir will endeavour to validate existing CPE connected to an MSAN node, identifying any anomalies. In particular testing to include type approved phones, remote and personal alarms.

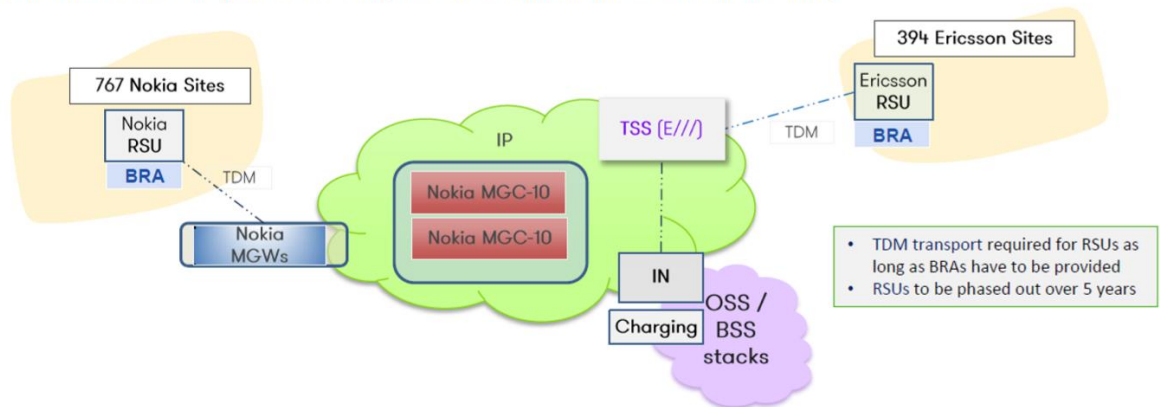
This request is to enable the capability to migrate existing PSTN and ISDN (PRA/FRA) services onto an MSAN node in the exchange. A presentation was provided at the PDW on 13th November 2019 to industry and ComReg.



Technical Workshop 29th January 2020

ISDN BRA Solution

- Intel’s ISDN BRA chips were discontinued in 2015 and as a result equipment vendors are no longer supplying BRA equipment
- Open eir will address BRAs by retaining a minimal amount of RSU equipment in each site for *working* BRAs only
- Open eir have communicated (CRD645) with Industry a proposed end-of-sale date for ISDN-BRA only from 01/01/2021, with an end-of-support from 31/12/2024, open eir are seeking consent for a withdrawal of service from Comreg.



Appendix 2: Further Information received from Eircom (27 May 2020)

From: [REDACTED]
Sent: Wednesday 27 May 2020 14:01
To: [REDACTED]
Subject: Withdrawal request for ISDN BRA

[REDACTED]

Further to our recent chat. As I mentioned the issue is not just with the availability of terminal adapters, the end of life of the product is also significantly influenced by the legacy nature of the network equipment. I would ask that you take the following into account in consideration of the withdrawal request.

The terminal adaptors are the visible connection point the customer sees on premises, however this is not the only legacy element of the service. The physical port in the local exchange by which the customer is provided with ISDN BRA is also a legacy element (ISDN BRA port). The hardware providing the ISDN BRA port is either on an E10 or AXE exchange shelf (depending on the physical location). These shelves are at end-of-life. As part of the Network Modernisation project, the availability of modern ISDN exchange equipment was explored and found to be out of production globally, the chipsets are no longer manufactured, removing the option of migrating ISDN BRA to local MSANs as had originally been envisaged. It is not possible to migrate from the AXE or E10 ISDN BRA shelf to a modern technical equivalent to maintain service as it is no longer available within the market and is obsolete. This fact was shared with ComReg in March/April 2019 at the project commencement.

The network modernisation project will consolidate and rehome the existing E10 and AXE ISDN BRA shelves in each exchange from the E10/AXE core to an intermediate Media Gateway (MGW) connected via SDH 2meg links, the MGWs will convert to IP over fibre and connect via the IP network to the MCG-10 to provide the service. This approach will prolong the service availability but does not resolve the issue of aging and end of life equipment facing the customer from the exchange and on the customer premises. The SDH used to connect the ISDN BRA shelves to the MGWs is itself a legacy platform with reducing customer circuits as the market moves to IP based services. Put simply the service cannot be maintained indefinitely. open eir believes that establishing a clear timebound roadmap for the withdrawal of the service is in the best interest of all stakeholders.

I would also note that the technical circumstances are not unique to Ireland and other operators and markets are already well ahead of open eir and retiring this product.

Regards,
[REDACTED]

Appendix 3: ComReg's correspondence



[REDACTED]
Eircom Ltd,
2022 Bianconi Avenue,
Citywest Business Campus,
Dublin 24,
D24 HX03.

07/10/2020

RE: Eircom request to withdraw access to ISDN BRA services.

EMAIL TO: [REDACTED]¹

Dear [REDACTED]

I refer to your emails dated 6 April 2020 and 27 May 2020, in which Eircom requested ComReg's approval to withdraw access to ISDN BRA services by (i) end of sale for new ISDN BRA services from 30 January 2021 and (ii) the withdrawal of Access to ISDN BRA services on 31 December 2024.

I wish to inform you that ComReg has decided to refuse Eircom's request, on the basis that Eircom has not demonstrated to ComReg's satisfaction that it is no longer feasible for Eircom to meet access requests for ISDN BRA services as mandated in ComReg Decision D05/15. On the contrary ComReg finds that Eircom is in the position to continue to provide ISDN BRA services, as follows:

(a) Eircom has the ability to recover and reuse NTUs from ceased ISDN BRA services;

(b) the exchange fault index² for ISDN BRA exchange-based equipment is very low and declining;³ and

(c) Implementation by Eircom of its Network Modernisation Project will reduce the requirements for TDM backhaul (for PSTN and ISDN PRA) and spare TDM

¹ [REDACTED] - [REDACTED]
² In a 12-month period: Number of exchange-based faults / Number of active lines.
³ 0.0014, 0.0010 and 0.0007 in 2017, 2018 and 2019 respectively.

transmission capacity can be retired, if required, for ISDN BRA backhaul purposes.

Eircom accordingly continues to be required to meet requests for access to ISDN BRA services, in accordance with ComReg Decision D05/15. As you are aware, a review of regulation in the FACO Markets is ongoing and ComReg will consider Eircom's and other respondents' submissions on requirements for the continuing provision of ISDN BRA services by Eircom where Eircom is found to have SMP in that context.

Yours sincerely

Donal Leavy
Director
Wholesale Division