



Emergency Call Answering Service Call Handling Fee Review 2013/2014 Operator responses to ComReg Document No. 12/112

Operator Responses to Consultation

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Content

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- 3 Hutchison 3G Ireland Limited

1 Eircom Limited

eircom Ltd.

**Response of eircom Ltd to ComReg Consultation and
Draft Determination 12/112:**

**Emergency Call Answering Services
Call Handling Fee review 2013-2014**



16 November 2012

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TABLE OF CONTENTS

INTRODUCTION	4
GENERAL COMMENTS	6
RESPONSES TO CONSULTATION QUESTIONS	12
BACKGROUND - COST STACK	12
RELEVANT COST STANDARD.....	13
VOLUMES	13
DRAFT DETERMINATION.....	15

INTRODUCTION

eircom welcomes the opportunity to respond to the ComReg consultation on its review of the Emergency Call Answering Service (ECAS) Call Handling Fee (CHF) for 2013/2014. The ECAS is a vital public service providing access to emergency services to the general public in Ireland. As in other jurisdictions the service is a key component of Government policy and is supported by national legislation.

For many years eircom provided the service on a *pro-bono* basis. In July 2007 eircom began to receive payments through the €1.55 charge per call, rising to €2.21 in August 2009. In August 2010 BT took over the ECAS operation and the CHF was set at €2.23 per call. By February 2011 (six months later) the CHF had increased by 50% to €3.35 for the period 2011/2012. This significant increase placed a considerable burden upon the operators concerned, which has been maintained since. ComReg's proposal to reduce the CHF by 12% to €2.96 per call for the period 12 February 2013 to 11 February 2014 is in this context welcome. However, eircom is of the view that this reduction is not sufficient and that the CHF remains far too high, requiring operators to pay for an ECAS that is inefficient. In particular, eircom believes that ComReg's approach to the determination of the CHF, whereby operators' efforts to reduce non-genuine calls to the ECAS are rewarded by increases in the CHF, is unreasonable and not consistent with ComReg's function under section 10 of the Communications Regulation Act "*to monitor the quality and the **efficiency** of the emergency call answering service established under Part 6 [of the Act]*" (emphasis added). A system whereby the operators' efforts to reduce spurious calls to the emergency services result in an *increase* of the CHF rewards inefficiencies and is accordingly inconsistent with the requirements of the 2012 Act.

eircom acknowledges that under the system established by the 2007 Act, details of the service that the ECAS operator must provide are set in the Concession Agreement between the operator – BT – and the Minister. However, it is also the case under the system established by the 2007 Act that it is ComReg that is entrusted to setting the maximum call handling fee that BT may charge and in doing so, must have regard to the "*reasonable costs*" likely to be incurred in operating the services. What amounts to reasonable costs is for ComReg to determine and not for BT and the Minister. It is not appropriate that ComReg reduces its analysis, as it is suggested at paragraph 39 of the consultation document, to assessing the reasonable costs *as defined in the Concession Agreement*. eircom in this regard is concerned that there are costs that may be deemed to be "reasonable" as defined in the Concession Agreement but in fact should not be deemed to be so by ComReg because they are inefficient. This will be addressed in further detail below in response to the specific questions of the

consultation and also in the next section where eircom sets out key concerns in relation to the operation of the ECAS, which relate to:

- ECAS Efficiencies
- ECAS Capacity
- ECAS Specifications
- Unnecessary Calls
- Efficiency Measures
- Depreciation Charges
- International Benchmarks
- Regulatory Impact Assessment and
- ECAS Contract Period

Ultimately, the current ECAS is designed to a capacity that is underutilised. It is modelled on 4.8m calls per annum but for 2013/2014 volumes are forecast to be 2.7m calls, 56% of capacity. It is eircom's position that in accordance with the Communications Regulation Act and ComReg's duty to monitor the efficiency of the emergency call answering service, ComReg must take this into account into determining the reasonable costs which BT may recover. In addition, it is essential that after the current contract has expired, the next ECAS is designed to meet realistic volumes of genuine calls, thereby ensuring that an ECAS that is as efficient as reasonably possible can be achieved. eircom has continually stressed the need to reduce volumes so that spurious and other unnecessary calls are eliminated. It is imperative therefore all efforts are now taken to reduce call volumes. In responding to the consultation eircom stresses that maximum efficiencies must be achieved in the operation of the ECAS so that in the long term the industry is not burdened with excessive charges.

GENERAL COMMENTS

eircom welcomes the proposed reduction in the CHF, which is overdue. However, for the reasons set out below, eircom remains of the view that BT continues to be entitled to recover more than the “reasonable costs” that it would incur in operating an efficient system.

ECAS Efficiencies

In Ireland there is a simple ECAS model, whereby the operation is solely devoted to the handling of emergency calls and does not provide any other service. This should provide clarity on the costs that are attributable to the service, as no other service can use the facilities and no opportunity exists for costs to be shared. However the information presented in the ComReg consultation document and the accompanying Tera Recommendations do not allow stakeholders to conduct a full evaluation of the operations. There are worrying comments from Tera that do not allow for confidence in the efficiency of the ECAS:

- The ECAS is approaching ‘best practice’¹. This suggests that after more than two years in full operation the ECAS is not operating to optimal efficiencies
- The Tera observation (from previous review) regarding forecasting time for training has not been implemented as the hours requested ‘seems high’²

Due to the number of redactions in the ComReg consultation document and the Tera Recommendations it is not possible for eircom to comment fully. ComReg has full visibility of the Tera Recommendations and it likely that the redacted elements relate to aspects of the service where ComReg has discretion to challenge inefficiencies. This discretion underlines the need for a Regulatory Impact Assessment (RIA) and ComReg should provide more information to the industry.

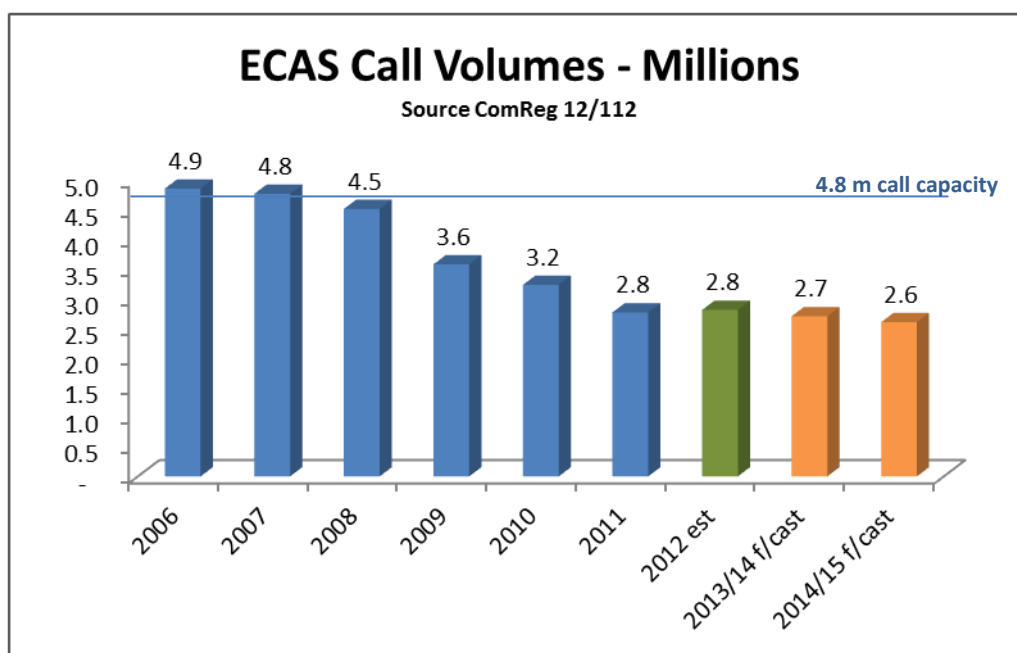
ECAS Capacity

The ECAS is designed to handle a far greater number of calls (4.8 million calls per annum) than is actually required and call volumes have decreased year on year, every year, as shown by the volume trends in the chart below. When BT took over operations in 2010 the ECAS was functioning at 67% of the 4.8 million call capacity. The 2012 estimates show that the ECAS is operating at 58% of capacity. Utilisation is expected to fall to 56% of capacity in 2013/2014 and 54% of capacity for the period 2014/2015.

¹ Tera page 4

² Ibid

This is clear evidence that up to 46% of the ECAS capacity will not be used. This is unquestionably an inefficient use of resources which the industry should not be expected to fund. eircom has commented in the past that the next ECAS must be based on realistic volume forecasts. The industry, that pays the CHF to fund the ECAS, should not be burdened with unnecessary costs. It is essential that ComReg, in determining what are the reasonable costs associated with providing an efficient ECAS, takes this issue into account.



ECAS Specifications

The initial requirement under the Concession Agreement was that the ECAS should operate using two Public Safety Answering Points (PSAP). However the industry now finds itself funding a third PSAP that is not required.

The metrics presented to the ECAS Quarterly Fora continually show that the targets are being exceeded by some distance. While this may be laudable there are undoubted additional resource requirements to surpass the targets in such a fashion.

There can be no question that going beyond the specification and required targets is excessive, this is particularly so when clearly the ECAS is handling large volumes of unnecessary calls.

Unnecessary Calls

In the context of reducing volumes, unnecessary calls to the ECAS are a persistent and expensive problem for the Industry. Based on the reduced CHF the cost of these calls for eircom will be in excess of €1m per annum. ComReg, the Department of Communications, Energy & Natural Resources (DCENR) and other stakeholders must work to achieve the

maximum efficiencies during the remaining life of this ECAS, in order that the next ECAS may be truly efficient. It is unreasonable for ComReg to expect that operators continue to fund an inefficient operation, the costs of which are ultimately borne by Irish consumers and businesses.

The efficiencies are affected by handling calls such as spurious³ and SIM Free⁴ calls that do not reflect the needs of the public. It is incumbent upon ComReg, DCENR and stakeholders to work to bring about a reduction in volumes so that only genuine calls are generated and passed to the ECAS, and that these call reductions translate in less costs overall to operators, not more or the same level of costs. Consequently measures must continue to be taken and initiatives put in place to deal with nuisance calls, spurious calls and SIM Free calls. The benefit will be an efficient ECAS service that operates in a cost effective manner and a reduced burden on the industry.

It is imperative that ComReg and DCENR show leadership to tackle unnecessary calls so that they are reduced or eliminated completely.

Efficiency Measures

For its part eircom is continuing its endeavours to reduce the spurious calls emanating from the fixed network, which is achieved by identifying the lines from which the calls are made and passing to our repair teams. The ECAS can readily identify lines, in real-time, that make repeat calls. eircom urges ComReg and BT to provide further assistance for the early identification of spurious '112' calls. eircom would also urge ComReg to re-examine its position in relation to the adoption by operators in Ireland of measures already used elsewhere in the European Union that would be very effective in reducing the number of spurious calls to the ECAS while ensuring continued access by all to the ECAS.

The matter of SIM Free calls requires commitment from ComReg, DCENR, BT and the Industry to facilitate moves to reduce the volumes. Statistics show that up to 94% of SIM Less calls are spurious and unnecessary calls⁵. In other jurisdictions (e.g. UK and Germany) these calls are blocked at network level and consequently do not pose an expensive problem for the industry. ComReg has a key role to play as the requirement to carry SIM-Less calls is one set in some of the mobile licences, and therefore entirely within the remit of ComReg.

³ Calls generated by faulty customer equipment or network connections

⁴ ECAS calls made from a mobile telephone without a SIM card

⁵ Slides presented at 2nd ECAS Quarterly Forum, February 27th 2012

Depreciation Charges

As with the previous review eircom disagrees with ComReg's allowance for the full depreciation of the assets employed for the ECAS over five years. The ECAS assets are clearly likely to have a remaining useful life beyond the end of the current ECAS contract. It would be reasonable to expect that the newly appointed ECAS provider, be it BT or a new provider, will take over the existing ECAS infrastructure. It would be unreasonable to expect the industry to fund a replica ECAS to facilitate the entry of a new provider. In these circumstances, the CHF would allow for no further depreciation of a fully depreciated infrastructure, thereby resulting in a decrease of the CHF thereafter. However, this clearly is not an efficient manner to approach cost recovery - in particular there is no good reason why the current ECAS operator should be entitled to frontload costs in this manner.

International Benchmarks

As was the case for the 2012/2013 review, it is not possible to use international benchmark comparisons to assess the proposed CHF. In almost all cases worldwide the service is funded by central governments or by government agencies. The model for ECAS in Ireland appears to be unique, in that it is funded solely by operators that pass on emergency calls.

The closest example is the UK where the service is operated by BT along with providing other commercially related services. It is difficult therefore to segregate the direct ECAS costs from the provision of other services in the UK. It is notable however that in the UK the funding is provided by the operators that pass the ECAS calls to BT and that the BT ECAS Fee is £0.7885 maximum (VoIP calls)⁶, this is equivalent to €0.99⁷. The proposed ECAS fee in Ireland of €2.96 is three times the rate charged in the UK. The absence of publicly available benchmark comparisons therefore behoves ComReg to be absolutely rigorous in its examination of the ECAS operations and the calculation of the ECAS Call Handling Fee.

In view of the preceding comments and that the proposed CHF is three times the UK equivalent, the rate of €2.96 is clearly excessive and unreasonable.

Regulatory Impact Assessment

Once again ComReg has not conducted a Regulatory Impact Assessment (RIA). The consultation document states that "*ComReg is not imposing a regulatory obligation upon any stakeholder. The obligation to pay the CHF is imposed by the Act of 2002. The Act of 2002*

⁶ BT (UK) Ancillary Service price list
https://www.btwholesale.com/pages/static/Library/Pricing_and_Contractual_Information/carrier_price_list/cpl_sectionb3ancillaryservice.htm

⁷ Exchange rates at 9th November 2012 <http://www.ecb.int/stats/exchange/eurofxref/html/index.en.html>

*also obliges ComReg to conduct the review and to determine the CHF annually. ComReg has no discretion to refuse to do so.*⁸”

While it is undoubtedly correct that ComReg has no discretion to refuse to conduct a review and determine the CHF annually, obviously the RIA would not be concerned with whether it is appropriate to determine a CHF, but with the level at which it is set and in this context, with the approach that ComReg must have in determining what are the reasonable costs that BT is entitled to recover. The level at which ComReg sets the maximum CHF does have an impact on all operators that forward calls to the ECAS. The full impact of the determination of the ‘maximum’ fee has been, and will continue to be, carried by the operators.

There is no evidence that ComReg has itself determined what are the reasonable costs that BT is entitled to recover (as opposed to the reasonable costs as defined in the Concession Agreement), having regard to the statutory requirement to ensure an efficient ECAS taking into consideration the impact on the industry. ComReg is acting under its legal obligations in the same way that ComReg conducts its other activities. It is not acceptable therefore that ComReg continues to avoid conducting a RIA. In addition, and in any event, even if ComReg’s position was correct (which it is not), it is clear from ComReg Doc. 07/56 on ComReg’s Approach to RIA, in particular paragraph 3.13, that ComReg will assess the requirement for a RIA in each case, having regard to its degree of discretion and the principles of reasonableness and proportionality. eircom has no doubt that ComReg should have conducted a RIA.

ECAS Contract Period

eircom notes that ComReg envisages the current contract running to mid-2015⁹. It had been eircom’s understanding that the contract was awarded in February 2009 to run for five years, expiring in February 2014. This was based on a Department of Communications, Energy and Natural Resources (DCENR) press release of 18th May 2009¹⁰ which stated that “*The contract, awarded following a public procurement process, will see BT Ireland operate the service for the next five years.*” On 22nd October 2010 ComReg said that “*The contract between BT and the Minister was called the “Concession Agreement” (“CA”) and it was entered into on 12 February 2009*”¹¹. Can ComReg confirm if the references to 2015 are incorrect or has there been a change in the contractual arrangements that have not been shared with the industry?

⁸ ComReg 12/112 page 54

⁹ ComReg 12/112 page 42 and Tera Recommendations page 6

¹⁰

<http://www.dcenr.gov.ie/Press+Releases/2009/Minister+Ryan+appoints+BT+Ireland+to+operate+Ireland+%e2%80%99s+emergency+call+answering+service.htm>

¹¹ ComReg 10/87 “Call for Input: Emergency Call Answering Service – Call Handling Fee review”

Confusion in respect of the duration of the Concession Agreement provides an unfair advantage to BT as the incumbent ECAS provider, over any prospective providers that may participate in the tender to provide the ECAS in the future. There is an immediate need for clarity on the contract duration.

Responses to Consultation Questions

Background - Cost Stack

Q. 1 Figure 4 represents the basis of the cost stack for the determination of the CHF for 2012-2013. Please provide any comments on whether the cost categories should remain the same for the determination of the CHF for 2013-2014, including detailed reasoning for your answer.

eircom agrees that the general cost categories included in the cost stack should remain the same for calculating the CHF for 2013-2014. Nonetheless, eircom has concerns with how some of the costs are derived. For example, in Section 156 ComReg notes that the guaranteed rate of return “*has been set at 6.63% on the gross book value of its investment (fixed assets and set up costs) for the term of the CA*”¹². This level of return appears generous given that the contract terms are designed to ensure that the ECAS operator is compensated for all its investments over the lifetime of the contract.

eircom notes ComReg’s comments (at paragraph 156) that because the rate of return is part of the Concession Agreement, it is not within the scope of the review that ComReg must conduct under the Act. It is not clear to eircom that this is the case. The Act refers to a “guaranteed rate of return” in the context of ComReg’s determination of the maximum CHF, not in the context of the terms and conditions that the Concession Agreement must include.

It is also the case that using straight line depreciation to write off assets over the duration of the contract assumes that the residual value of the assets is nil, which may not be the case. The existing assets should be expected to retain some value beyond the duration of the Concession Agreement to the extent that their useful economic life will not have expired and they will continue to be able to be used to support an ECAS system. eircom strongly disagrees with ComReg’s position in this matter, in particular as set out at paragraph 151.

At paragraph 164, ComReg takes the view that it must allow the recovery of the costs of the Sinking Fund because “*it has no power under the Act and because it is not a party to the CA*”. eircom notes that ComReg must have regard to the reasonable costs incurred in providing the service and that it does have the obligation to review whether the costs associated with the sinking funds are reasonable, including its size having regard to the service, independently of the requirements of the CA.

¹² ComReg 12/112 page 38

Relevant Cost Standard

Q. 2 Do you agree or disagree that it is appropriate to continue to apply the above methodologies for the 2013-2014 CHF review? Please provide detailed reasoning and calculations for your views.

eircom notes that the ECAS platform is relatively new and so there would be little to be gained by adopting a Current Cost Accounting approach. Therefore a hybrid costing methodology, based on HCA accounts (appropriately adjusted for reasonableness) and reflecting forward-looking cost and volume data continues to be appropriate. Avoidable cost is also the appropriate cost principle as it ensures that the operator cannot use the ECAS CHF to help subsidise other parts of its operation.

Reasonable Costs

Q. 3 Do you agree or disagree with ComReg's preliminary view that €28.07 is a reasonable hourly rate payable to the specialist call centre company, based on what costs have been allowed and what costs have been disallowed? Please provide detailed reasoning and calculations for your views.

In general, in the ComReg consultation document and the Tera Recommendations, there is an absence of sufficient detail to enable a fully considered response.

Much of the relevant data and figures have been redacted. The hourly cost of €12.79 in respect of salary, bonus and PRSI appears to be reasonable and in line with industry norms. However, it is not possible to comment on the remaining elements of the hourly charge given the lack of detail provided. eircom would have preferred to have visibility of the detail behind the remaining €15.28 per hour. This is a mark-up of 120% on the direct labour costs, which seems high for a labour intensive operation. An explanation of each element of this figure and the basis on which this is included is required before it can be reviewed.

Volumes

Q. 4 Please outline if you are aware of any network remediation programme or any such initiatives in the short to medium term (1 to 3 years) which may affect the forecasted volume of emergency calls.

eircom continues to monitor spurious ‘112’ calls and report any faulty lines to the eircom fault handling centre. In the case of calls not generated from within the eircom network, customers are advised of defective equipment. Technicians are dispatched to investigate the fault and repair in the case of a cable fault.

eircom is aware that the ECAS can identify lines that make repeat calls in real time. eircom urges ComReg and BT to provide further assistance for the early identification of spurious ‘112’ calls. This will greatly facilitate and speed up the identification of lines and customer equipment generating these spurious calls. Reducing spurious calls will contribute to the overall efficiency of the ECAS operation.

Cost Volume Relationship

Q. 5 Do you agree or disagree with the proposed forecast of the call volume decline rate of 2.5% per annum? Please provide detailed reasoning and calculations for your views.

In terms of ComReg’s rationale at paragraphs 184 to 187, eircom notes that that some of the costs that ComReg considers to be “fixed” are not necessarily so if, as it should, the maximum volume of calls that BT may reasonably be expected to answer is taken into account. For instance, the minimum number of CSRs that are required, while determined on the number of potential peaks of calls, is not necessarily the same if the maximum total volume of calls is estimated at 4.8 million or at 2.7 million. Further clarifications in relation to this issue are required.

The volume forecast ignores the fact that approximately 28% of all ECAS calls are SIM Free (CLI less)¹³. This is a significant volume of calls and creates an unacceptable burden for the industry. For Meteor SIM Free ECAS calls represent approximately 35% of ECAS calls from its network. Countries such as Sweden estimate that over 98% of calls from SIM Free handsets are either hoax or false calls. In the Irish context this equates to approximately 768,000 calls per annum. This issue needs to be addressed by ComReg and DCENR with industry, given the significant inefficiency imposed on the ECAS and the huge cost burden. At the ECAS Quarterly Forum of 27th February 2012 it was noted that 6% of SIM Less calls are “normal calls”, therefore 94% of SIM Less calls are calls are spurious and unnecessary.

¹³ Slides presented at 2nd ECAS Quarterly Forum, February 27th 2012

SIM Free calls also consume significant resources from the emergency services perspective creating inefficiencies in the system and it is notable that in recent times some countries (for example UK and Germany) have taken active steps to technically restrict SIM Free ECAS calls in order to eliminate this inefficiency. Based on the volume projections, no account of any reductions in SIM Free calls seems to be factored in. In that context eircom would not agree with the forecast as presented.

For the avoidance of doubt, insofar as eircom is concerned, the critical issue in relation to SIM Less call volumes is not, as ComReg appears to suggest, concerned with whether BT must handle SIM-Less calls and be entitled to charge the CHF, but whether operators are obliged to transfer such calls to BT. eircom does not agree that it is beyond ComReg's remit to deal with it, or that the Concession Agreement has anything to do with it. The obligation to pass on SIM-Less calls to the emergency services is one that has been set by ComReg in the mobile licences and is clearly within its remit to amend. There is no requirement under the Universal Services Regulations that would prevent ComReg to do so.

eircom continues its project to monitor spurious calls to '112' from fixed lines and report any faulty lines to our fault handling centre. In the case of calls not generated from within the eircom network, customers are advised of defective equipment. Technicians are dispatched to investigate the fault and repair in the case of a cable fault. eircom believes that the forecast reduction in call volumes is consistent with the objectives of this project on the fixed line side.

Draft Determination

Q. 6 Do you agree or disagree with the wording of ComReg's Draft Determination? If not, please state your detailed reasoning.

Notwithstanding the comments elsewhere in this response eircom does not have any concerns with the wording of the Draft Determination.

eircom again notes the inefficiencies of the ECAS, the absence of a Regulatory Impact Assessment and that the proposed €2.96 CHF is three times that charged in the UK.

2 Magnet Networks Limited

Magnet welcomes the review that ComReg undertakes into the provision of the ECAS service. It is a comprehensive and thorough review and would like to see such similar reviews being undertaken with the incumbent in other market segments.

Q. 1 Figure 4 represents the basis of the cost stack for the determination of the CHF for 2012-2013. Please provide any comments on whether the cost categories should remain the same for the determination of the CHF for 2013-2014, including detailed reasoning for your answer.

Magnet Networks has no comment to provide in relation to the cost stack outlined in Figure 4.

Q. 2 Do you agree or disagree that it is appropriate to continue to apply the above methodologies for the 2013-2014 CHF review? Please provide detailed reasoning and calculations for your views.

Magnet agrees that the outlined methodologies are the most appropriate to continue with for this review.

Q. 3 Do you agree or disagree with ComReg's preliminary view that €28.07 is a reasonable hourly rate payable to the specialist call centre company, based on what costs have been allowed and what costs have been disallowed? Please provide detailed reasoning and calculations for your views.

Magnet believe this is a reasonable rate of return for the specialist call centre.

Q. 4 Please outline if you are aware of any network remediation programme or any such initiatives in the short to medium term (1 to 3 years) which may affect the forecasted volume of emergency calls

Magnet is not aware of any network remediation programme in the short to medium term.

Q. 5 Do you agree or disagree with the proposed forecast of the call volume decline rate of 2.5% per annum? Please provide detailed reasoning and calculations for your views.

Magnet disagrees with the volume decline of 2.5% as suggested. Magnet believes that a 1.5% decline is more appropriate. Firstly, Magnet believes now that Eircom have resolved their ghosting issue call volumes will plateau at a more normal rate. As outlined in paragraph 186 call volumes declined at 1.5% between June 2011 and June 2012. Magnet foresees that a 1.5% decline or less will occur between June 2012 and June 2013. As outlined in the consultation there are peaks and troughs with emergency calls i.e. increase at Halloween, bank holiday weekend and severe weather occasions. As there has been a plateau since June 2011 Magnet feels that a 1.5% decline per annum is more accurate than the proposed 2.5%.

Q. 6 Do you agree or disagree with the wording of ComReg's Draft Determination? If not, please state your detailed reasoning.

Magnet agrees with the proposed working of the determination by ComReg.

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16 November 2012

Dear Michelle

COMREG DOC. NO. 12/112

I refer to ComReg Doc. No. 12/112, "*Emergency Call Answering Services – Call Handling Fee Review 2013 - 2014*" (the "Consultation").

Hutchison 3G Ireland Limited ("H3GI") welcomes the proposed reduction of the ECAS call handling fee to €2.96. However, we reiterate the comments that we made in response to ComReg's equivalent consultation last year. H3GI responds to ComReg's specific questions in an annex to this letter.

Yours sincerely


MARK HUGHES
Head of Regulatory Affairs

Directors
Robert Finnegan: Irish
Canning Fok: British
Frank Sixt: Canadian
Robert Eckert: U.S.A
Edmond Ho: British
David Dyson: British
Richard Woodward: British

A Hutchison Whampoa Company

ANNEX

Q. 1 Figure 4 represents the basis of the cost stack for the determination of the CHF for 2012-2013. Please provide any comments on whether the cost categories should remain the same for the determination of the CHF for 2013-2014, including detailed reasoning for your answer.

Please see comments above.

Q. 2 Do you agree or disagree that it is appropriate to continue to apply the above methodologies for the 2013-2014 CHF review? Please provide detailed reasoning and calculations for your views.

Please see comments above.

Q. 3 Do you agree or disagree with ComReg's preliminary view that €28.07 is a reasonable hourly rate payable to the specialist call centre company, based on what costs have been allowed and what costs have been disallowed? Please provide detailed reasoning and calculations for your views.

Please see comments above.

Q. 4 Please outline if you are aware of any network remediation programme or any such initiatives in the short to medium term (1 to 3 years) which may affect the forecasted volume of emergency calls.

We are not aware of any network remediation programme or any such initiatives in the short to medium term (1 to 3 years) which may affect the forecasted volume of emergency calls.

Q. 5 Do you agree or disagree with the proposed forecast of the call volume decline rate of 2.5% per annum? Please provide detailed reasoning and calculations for your views.

No comment.

Q. 6 Do you agree or disagree with the wording of ComReg's Draft Determination? If not, please state your detailed reasoning.

No comment.

