



Commission for  
**Communications Regulation**

## Information Notice

### **SMP Operator QoS Performance**

**Report on quality of service performance in provision of service to Other Authorised Operators for the period from January to June 2004.**

<b>Document No:</b>	<b>04/116a</b>
<b>Date:</b>	<b>30<sup>th</sup> November 2004</b>

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## 1 Introduction

### 1.1 Programme Description

This data has been collected as part of a programme to measure fixed telephony operator performance. This is an initiative led by ComReg in co-operation with leading fixed telephony operators in the Irish Market.

### 1.2 Markets addressed in this report

This report presents quality of service performance data for

- the supply of regulated services, by *eircom*, in the fixed services and networks markets under their designation as having Significant Market Power.
- Public Payphone services operated by *eircom* under their designation as having universal service obligation.

### 1.3 Performance measures reported.

At present the performance measures focus on *eircom*'s management of orders, faults and complaints and, in particular, the promises made by *eircom* to their customers, in this case the Other Authorised Operators (OAO's).

#### 1.3.1 Definition of an Order

**An Order** is defined as a contractual commitment made to the customer to provide a product or service, or a change to an existing service.

**Order Completion** is defined as the point when all items are available for use by the customer and is attributable to the network of the service provider or an interconnected public network.

#### 1.3.2 Definition of a Fault

**A customer reported fault** is a report of a disrupted or degraded service that is made by a customer and is attributable to the network of the service provider or an interconnected public network.

**Fault Clearance** is defined as being when all items are available for use by the customer as confirmed by the operator.

#### 1.3.3 Definition of a Complaint

**A complaint** is defined as an expression of dissatisfaction with the operator or the service it provides, received from a user or a member of the public. Complaints will be formally 'registered' by entering them into a complaint database and assigning a unique reference number to each complaint.

A complaint is considered *processed* when

- a complainant agrees that all issues have been satisfactorily dealt with, and has been completed or closed, or
- the complaint is withdrawn, or
- the operator has completed all stages of its internal complaint handling procedures, and has informed the complainant accordingly and the operator considers the complaint completed, or
- the complaint has gone to dispute resolution or litigation.

#### **1.4 How accurate or comparable is this information**

All published measures have been subject to an independent audit and comparability review process in order to ensure accuracy and comparability of results before their publication. In certain cases, caveats are included in this report to indicate events that have distorted the results in a way that is not representative of *eircom*'s overall performance.

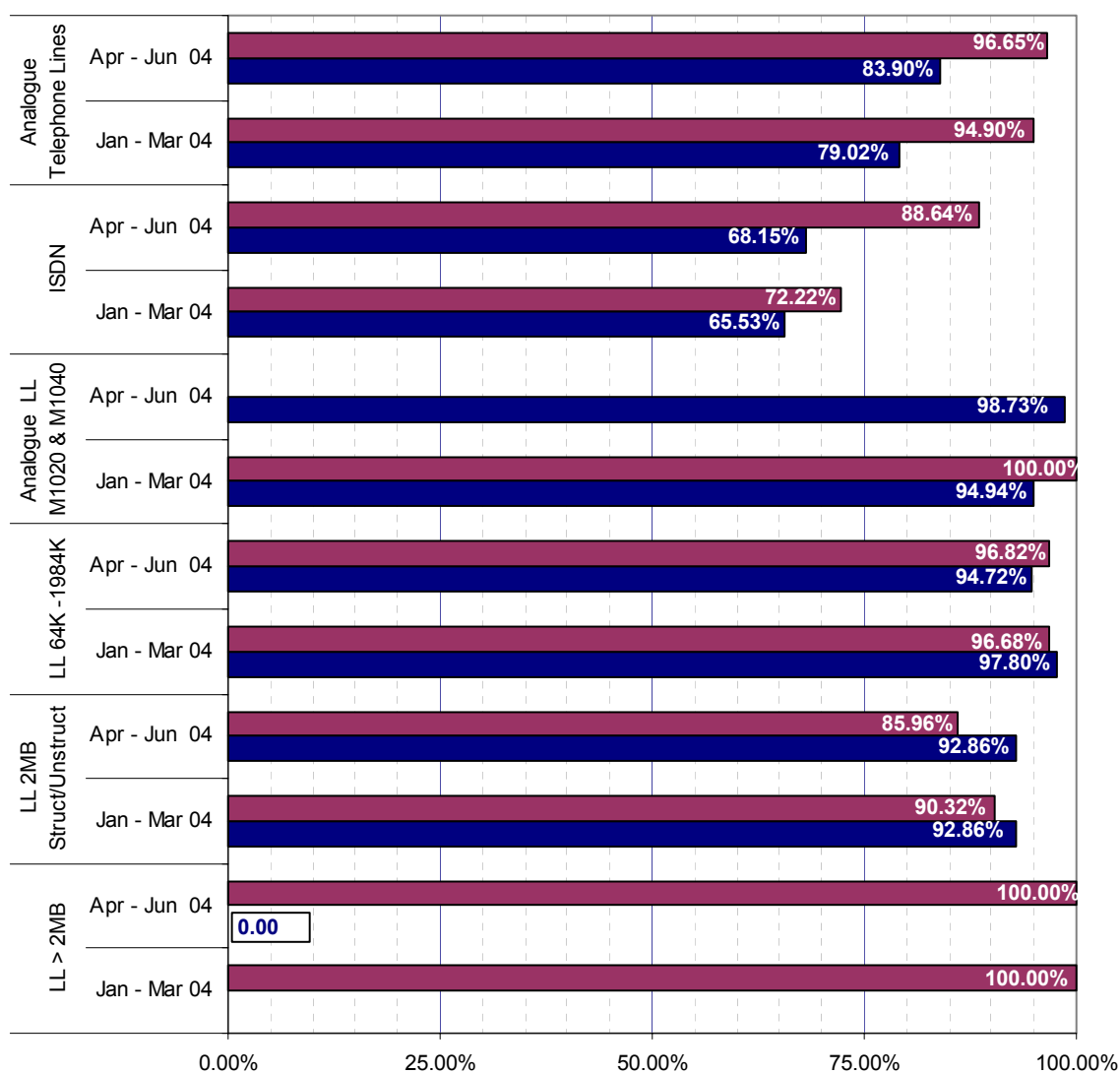
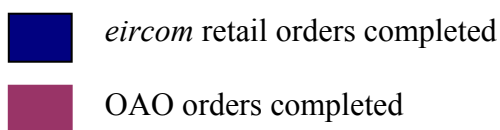
## 2 SMP to OAO – Order Completion

In evaluating these results consumers should take factors such as operator promise times, size, target market, supplier relationship and coverage into consideration.

### 2.1 Carrier Services Orders

#### 2.1.1 Carrier services orders completed by promised order completion time

This graph indicates the percentage of total carrier services orders that eircom completed on or before the date confirmed/contracted with the customer.



2.1.2 Carrier services order – Variance from promised order completion

This table indicates the percentage variance in days from the promised order completion date for carrier service orders.

- Variance from promise date – *eircom* retail orders
- Variance from promise date – OAO orders

		<=0 days	1 day	5 days	10 days	20 days	30 days	50 days	100 days	>100 days
Analogue Telephone Lines	Jan - Mar 04	94.90%	0.54%	1.51%	1.25%	0.85%	0.26%	0.51%	0.14%	0.03%
		79.02%	4.45%	6.25%	3.29%	2.57%	1.37%	1.34%	1.17%	0.55%
	Apr - Jun 04	96.65%	0.46%	1.05%	0.64%	0.73%	0.32%	0.11%	0.05%	-
ISDN	Jan - Mar 04	83.90%	2.96%	4.21%	3.03%	2.44%	0.99%	0.90%	0.82%	0.75%
		72.22%	8.89%	10.00%	4.44%	1.11%	2.22%	1.11%	-	-
	Apr - Jun 04	65.53%	3.89%	9.94%	7.87%	5.62%	2.60%	2.23%	1.29%	1.04%
Analogue LL M1020 & M1040	Jan - Mar 04	88.64%	0.57%	3.41%	1.70%	1.70%	0.00%	0.57%	1.14%	2.27%
		68.15%	3.76%	9.25%	7.65%	5.45%	2.11%	1.70%	1.19%	0.74%
	Apr - Jun 04	100.00%	-	-	-	-	-	-	-	-
LL 64K -1984K	Jan - Mar 04	94.94%	1.27%	0.00%	1.27%	0.00%	2.53%	-	-	-
		98.73%	0.00%	0.00%	1.27%	-	-	-	-	-
	Apr - Jun 04	96.68%	1.24%	1.24%	0.41%	0.41%	-	-	-	-
LL 2MB Struct/Unstruct	Jan - Mar 04	97.80%	0.20%	0.80%	0.80%	0.00%	0.40%	-	-	-
		96.82%	0.80%	0.53%	0.27%	0.53%	0.53%	0.53%	-	-
	Apr - Jun 04	94.72%	0.26%	0.79%	0.79%	0.53%	0.53%	1.06%	1.06%	0.26%
LL > 2MB	Jan - Mar 04	90.32%	0.00%	3.23%	3.23%	0.00%	0.00%	0.00%	0.00%	3.23%
		92.86%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7.14%	-
	Apr - Jun 04	85.96%	3.51%	1.75%	1.75%	3.51%	3.51%	-	-	-
	Jan - Mar 04	92.86%	7.14%	-	-	-	-	-	-	-
		100.00%	-	-	-	-	-	-	-	-
	Apr - Jun 04	100.00%	-	-	-	-	-	-	-	-
	0.00%	0.00%	0.00%	0.00%	100.00%	-	-	-	-	

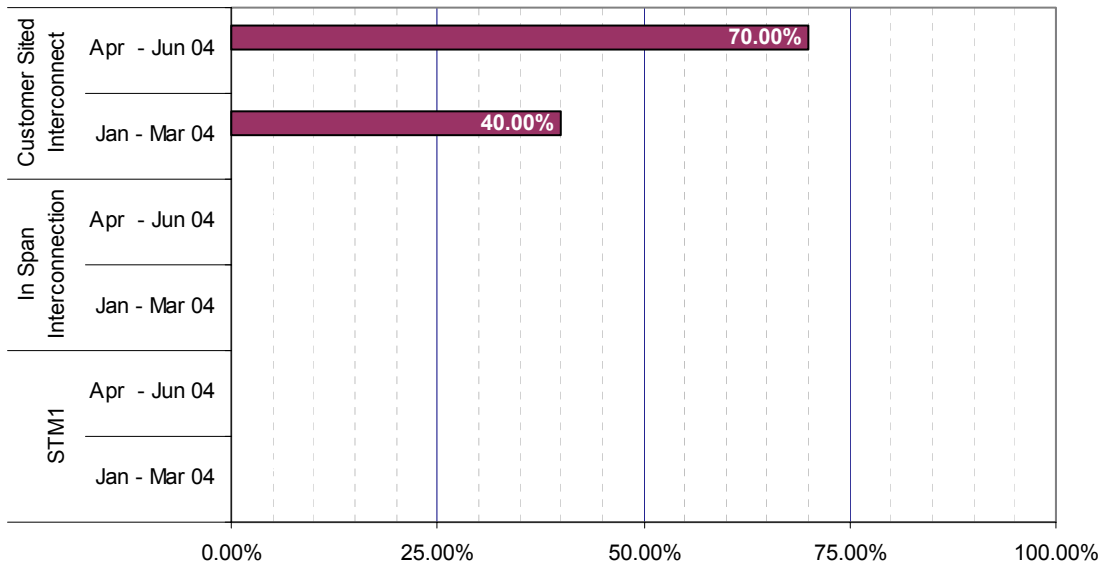
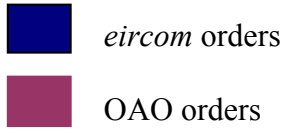
**SMP operator target promise time for order completion**

Analogue & ISDN Lines	Customer required date
Leased Lines (M1020/M1040 & 64 Kbit/s – 1984 Kbit/s)	22 days or customer required date if later.
Leased Lines (structured & Unstructured)	26 days or customer required date if later
Leased Lines <2Mbit/s	Project Managed

## 2.2 Interconnect Circuit Orders

### 2.2.1 Interconnect orders completed by promised order completion time

This graph indicates the percentage of total interconnect circuit orders that *eircom* completed on or before the date confirmed/contracted with the customer.



### 2.2.2 Interconnect circuit orders – Variance from promised order completion date.

This graph indicates the percentage variance in days from the promised order completion date for interconnect circuit orders.

		<=0 days	1 day	5 days	10 days	20 days	30 days	50 days	100 days	>100 days
Customer Sited Interconnect	Jan - Mar 04	40.00%	0.00%	0.00%	0.00%	50.00%	0.00%	0.00%	0.00%	10.00%
	Apr - Jun 04	70.00%	0.00%	0.00%	20.00%	10.00%	-	-	-	-
In Span Interconnection	Jan - Mar 04	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Apr - Jun 04	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
STM1	Jan - Mar 04	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Apr - Jun 04	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

#### SMP operator target promise time for order completion

Customer Sited Interconnect	Promise Time Variable
In Span Interconnection	Promise Time Variable
STM1	Promise Time Variable

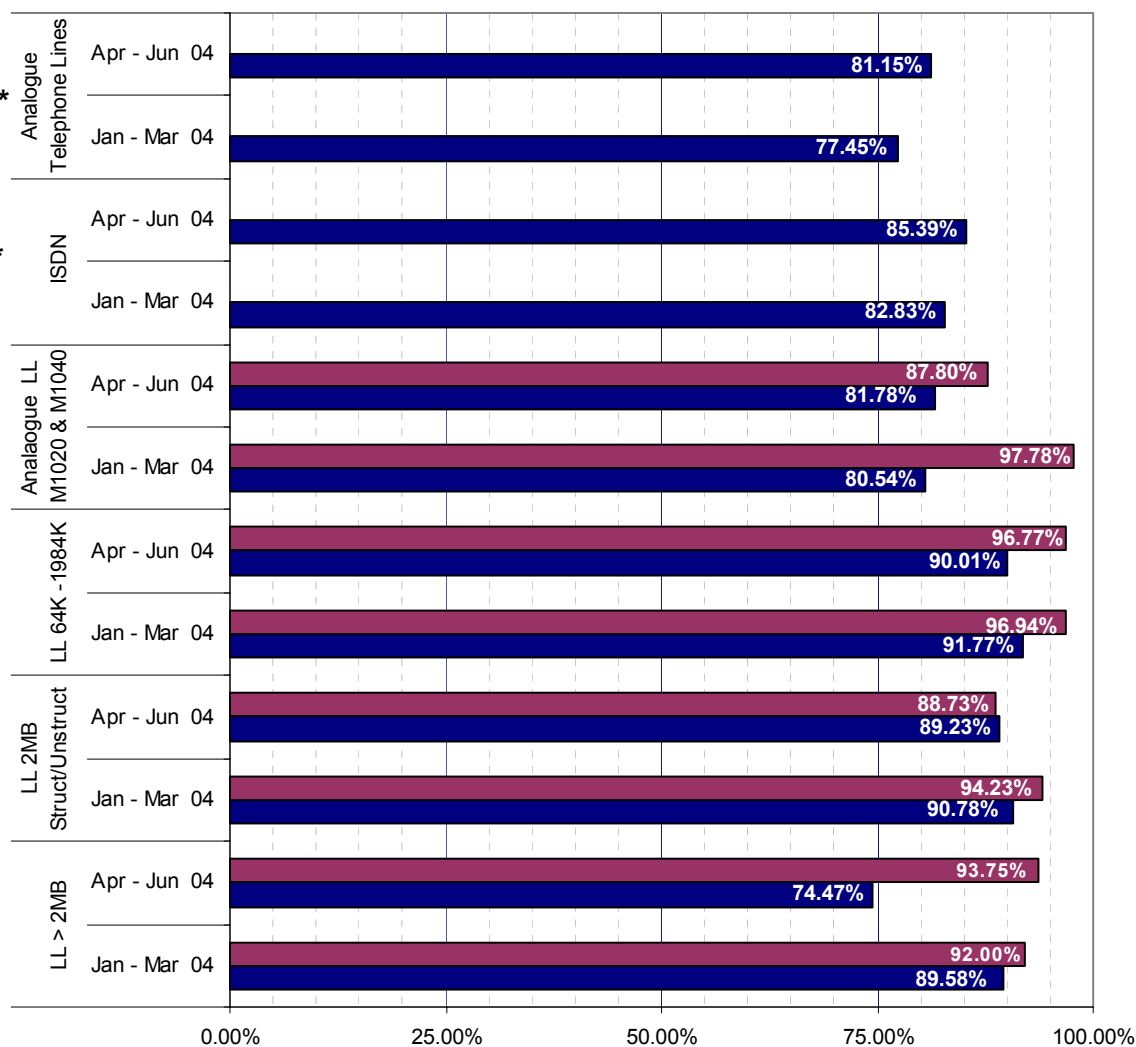
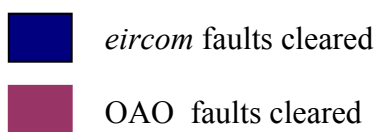
### 3 SMP to OAO – Fault Clearance

In evaluating these results consumers should take the following factors such as operator promise times, size, target market, supplier relationship and coverage into consideration.

#### 3.1 Carrier Services Faults

##### 3.1.1 Carrier services faults cleared by promised fault clearance time

This graph indicates the percentage of carrier services customer reported faults that the SMP operator has cleared within the promised target time.



\* For Analogue and ISDN lines eircom have included faults attributable to OAO's within the retail data area



3.1.2 Carrier Services faults – Variance from promised fault clearance time

This table indicates the percentage variance in hours from the promised fault clearance time for carrier services faults.

		<=0 hours	1 hour	2 hours	4 hours	8 hours	>8 hours
<b>Analogue Telephone Lines *</b>	Jan - Mar 04	77.45%	1.51%	1.43%	2.49%	2.77%	14.35%
	Apr - Jun 04	81.15%	1.34%	1.28%	2.32%	2.47%	11.44%
<b>ISDN *</b>	Jan - Mar 04	82.83%	1.11%	1.11%	1.93%	2.15%	10.88%
	Apr - Jun 04	85.39%	1.04%	1.13%	1.72%	1.70%	9.00%
<b>Analogue LL M1020 &amp; M1040</b>	Jan - Mar 04	97.78%	2.22%	-	-	-	-
	Apr - Jun 04	80.54%	2.71%	1.81%	3.51%	4.61%	6.82%
	Apr - Jun 04	87.80%	2.44%	2.44%	0.00%	7.32%	-
<b>LL 64K -1984K</b>	Jan - Mar 04	81.78%	2.14%	1.69%	1.91%	6.41%	6.07%
	Apr - Jun 04	96.94%	0.73%	0.00%	0.36%	1.09%	0.88%
	Apr - Jun 04	91.77%	1.35%	0.97%	1.28%	2.28%	2.35%
<b>LL 2MB Struct/Unstruct</b>	Jan - Mar 04	96.77%	0.88%	0.12%	0.76%	1.11%	0.35%
	Apr - Jun 04	90.01%	2.51%	0.87%	1.47%	3.21%	1.94%
	Apr - Jun 04	94.23%	1.31%	1.31%	1.31%	1.31%	0.52%
<b>LL &gt; 2MB</b>	Jan - Mar 04	90.78%	2.43%	0.97%	0.49%	2.43%	2.91%
	Apr - Jun 04	88.73%	1.47%	1.47%	3.19%	3.68%	1.47%
	Apr - Jun 04	89.23%	3.08%	0.00%	1.54%	1.54%	4.62%
<b>LL &gt; 2MB</b>	Jan - Mar 04	92.00%	0.00%	0.00%	0.00%	0.00%	8.00%
	Apr - Jun 04	89.58%	0.00%	2.08%	0.00%	4.17%	4.17%
	Apr - Jun 04	93.75%	3.13%	0.00%	3.13%	-	-
Apr - Jun 04	74.47%	2.13%	2.13%	2.13%	4.26%	14.89%	

\* For Analogue and ISDN lines *eircom* have included faults attributable to OAO's within the retail data area

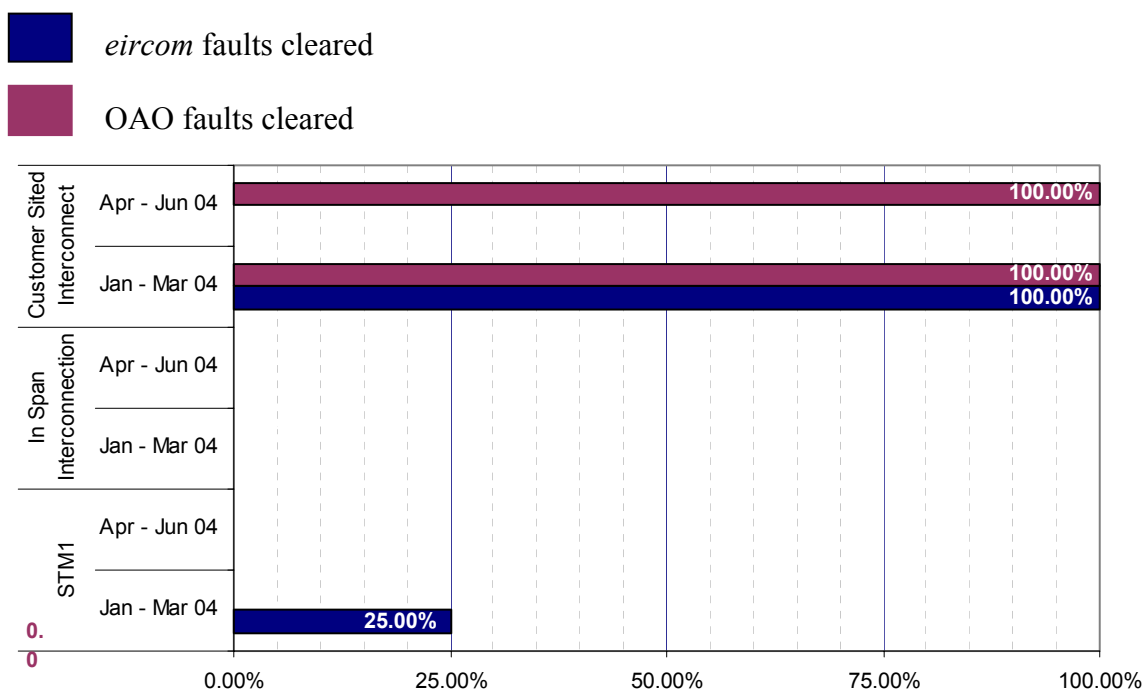
**SMP operator target promise time for fault clearance**

Analogue & ISDN Lines                      17 working hours  
 Leased Lines                                      8 hours

### 3.2 Interconnect Circuit Faults

#### 3.2.1 Interconnect circuit faults cleared by promised fault clearance time

This graph indicates the percentage of interconnect circuit customer reported faults that the SMP operator has cleared within the promised target time.



#### 3.2.2 Interconnect circuit faults – Variance in hours from the promise fault clearance time.

This table indicates the percentage variance in hours from the promised fault clearance time for interconnect circuit faults.

		<=0 hours	1 hour	2 hours	4 hours	8 hours	>8 hours
Customer Sited Interconnect	Jan - Mar 04	100.00%	-	-	-	-	-
	Apr - Jun 04	100.00%	-	-	-	-	-
	Jan - Mar 04	100.00%	-	-	-	-	-
In Span Interconnection	Jan - Mar 04	-	-	-	-	-	-
	Apr - Jun 04	-	-	-	-	-	-
STM1	Jan - Mar 04	25.00%	0.00%	75.00%	-	-	-
	Apr - Jun 04	-	-	-	-	-	-

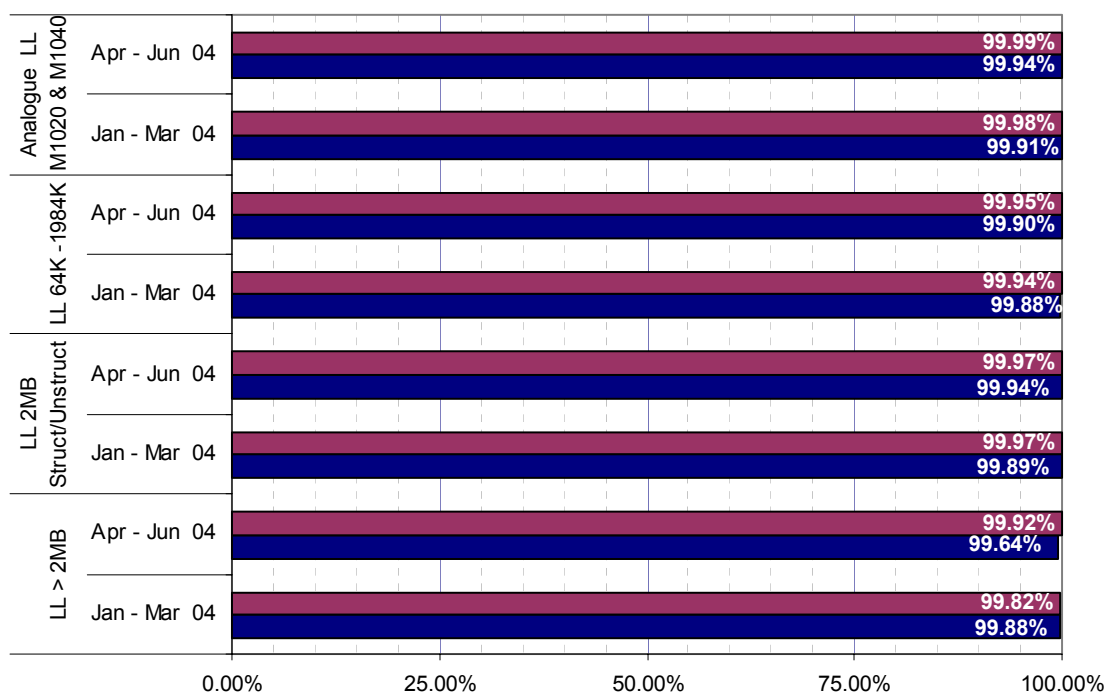
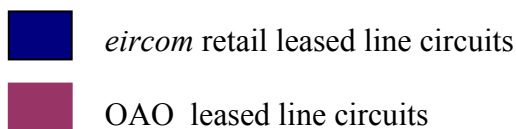
**SMP operator target promised time for fault clearance.**

Customer Sited Interconnect	8 hours
In Span Interconnect	8 hours
STM1	8 hours

## 4 Availability of Leased Lines and Interconnect Circuits

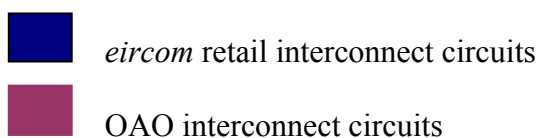
### 4.1 Availability of Leased Lines

This graph indicates the average availability of leased line circuits for the measurement period.

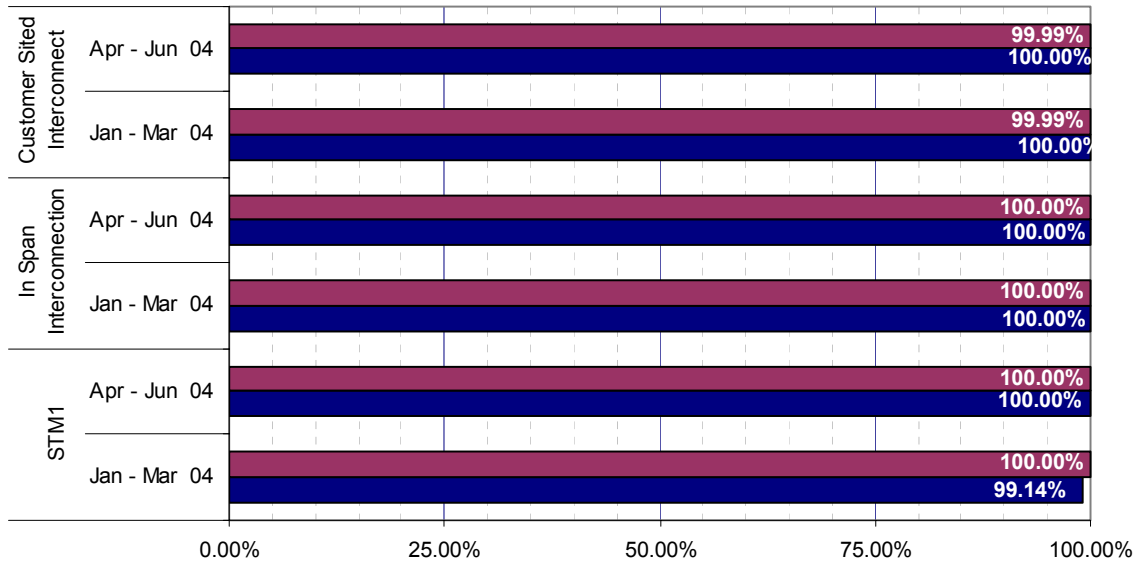


### 4.2 Availability of Interconnect Circuits

This graph indicates the average availability of leased line circuits for the measurement period.



Fixed Telephony Operator Performance – January to June 2004



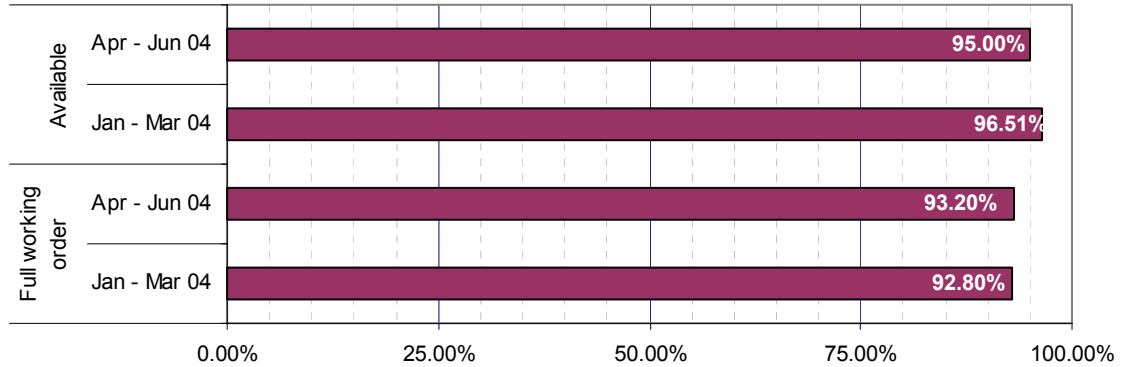
## **5 Carrier Services and Interconnect Complaints**

No complaints were registered for the period from January to June 2004.

## 6 Public Payphones

In evaluating these results consumers should take factors such as operator promise times, size, target market, supplier relationship and coverage into consideration.

This graph provides an indication of the percentage of payphones available and/or in full working order.



Average number of coin or card operated public payphones during the reporting period.	Jan-Mar	<b>6306</b>
	Apr-Jun	<b>6232</b>

## Appendix A – Operator submitted statement

### *eircom Ltd*

*eircom* is Ireland's leading provider of telecommunications providing a comprehensive range of advanced voice, data and internet services. *eircom* also offers services to Other Authorised Operators to carry telecommunications traffic for their customers.

The company, which was formerly known as Telecom Eireann, was established in 1984 when it became a semi-state company. In July 1999, the company was listed on the Irish, London and New York stock exchanges. In May 2001, *eircom*'s mobile business, Eircell, was sold to Vodafone. In November 2001 *eircom* plc was purchased by Valentia Telecommunications Ltd and subsequently delisted from the Stock Exchange in December 2001.

*eircom* returned to the Dublin and London Stock Exchanges on 19 March 2004.

## Appendix B – Explanation of this Programme

### Background

Since 1999, ComReg has been working with fixed telephony operators to agree a framework for measuring the quality of service performance. In order to achieve this, ComReg (then the office of the Director of Telecommunications Regulation) established the Measuring Licence Operator Performance (MLOP) Industry Forum, which has been meeting on a regular basis since the beginning of 2000 and has defined the measures used in this report and the process by which the measures are collected and published.

The current MLOP publication incorporates quality of service performance data collected for the two measurement periods from January to March and April to June 2004. Each operator has collected service performance data against the defined MLOP Industry Forum measures. (see ComReg website [www.comreg.ie](http://www.comreg.ie)<sup>1</sup>)

All operators are required to collect data on complaint handling performance. Operators who exceed the following MLOP agreed thresholds collect information for management of order and fault categories.

<b>Service Offered</b>	<b>Threshold for reporting</b>
Direct Access Telephony	2,500 channels in specific market (business or Residential)
Indirect Access Telephony	From first year where annual revenues exceed €1,269,738 from indirect access services.
National Leased Lines	500 digital leased lines

### Audit and Comparability Review Process

Once the operators have collected the data for the relevant collection period, it is subject to a two step audit and comparability review process, before publication.

#### *Step 1 Accuracy Audit*

After the data is collected, independent auditors, chosen by each operator, ensure that the data is complete, accurate and in compliance with the defined MLOP Industry Forum measures.

#### *Step 2 Comparability Review*

After the Accuracy Audit, the data is then passed to the independent Comparability Assessor who is chosen by the MLOP Industry Forum. The Comparability Assessor's function is to evaluate the accuracy audit reports from all the participating operators and to make a judgement on the comparability of that data using information, which describes:

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<sup>1</sup> The MLOP definitions (v3.2) document is available on the ComReg website.



- How the data was captured
- How the data was processed
- How the measure has been calculated by the operator.
- How the measure has been reported.

**Publication of MLOP Results**

On successful completion of the comparability assessment, comparable data may be submitted for publication.

## Glossary

<b>Access Line</b>	An access line is the connection from the Network Termination Point to the entry point of the local switch or remote concentrator, whichever is the nearer. In many cases this is the main distribution frame.
<b>Calling Line Identity (CLI)</b>	A registered CLI is a recognised Calling Line Identity (CLI) enabled by the service provider to allow network access, i.e. CLIs that are registered as billable on the operator's network.
<b>Carrier Service Circuits</b>	Carrier services circuits are wholesale circuits negotiated between the SMP operator and OAOs, which are specified in <i>eircom</i> document "Statement of Service Levels for the provision of Specified Services to Other Authorised Operators".
<b>Complaint</b>	A complaint is defined as an expression of dissatisfaction with the operator or the service it provides, received from a user or a member of the public.
<b>Complaint Processed</b>	Complaints are considered processed when: a complainant agrees that all issues have been satisfactorily dealt with and has been completed and closed, the complaint is withdrawn, or the operator has completed all stages of its internal complaint handling procedures, and has informed the complainant accordingly and the operator considers the complaint completed or the complaint is gone to dispute resolution or litigation.
<b>CPS- Carrier Pre-selection</b>	CPS is the facility that permits a consumer to decide in advance to use an alternative operator to carry certain pre-defined classes of call (e.g. all international calls). The consumer does not have to dial a routing prefix or follow any other procedure to evoke such routing.
<b>Customer Reported Fault</b>	A customer reported fault is a report of a disrupted or degraded service that is made by a customer and is attributable to the network of the service provider or an interconnected public network.

<b>Direct Service</b>	A Direct Service is one for which the operator provides a direct link from exchange equipment to a customer's premises (switched).
<b>Fault Cleared</b>	Fault Clearance is defined as being when all items are available for use by the customer as confirmed by the operator.
<b>Indirect Service</b>	An Indirect Service is a telephony service provided to an end user via another Authorised operator's switched access network.
<b>Interconnect Circuit</b>	An interconnect circuit is a single 2 Mbit/s circuit as specified in the SMP's Reference Interconnect Offer (RIO).
<b>Leased Line</b>	A leased line is a single dedicated connection between two (or more) customer sites. Leased lines are also purchased to connect operator network points of presence to a customer's site.
<b>MLOP</b>	The Measuring Licensed Operator Performance (MLOP) programme is an initiative led by ComReg in co-operation with leading fixed line telecommunications operators in the Irish market. This regular publication will present quality of service performance results that have been provided by the major fixed line telecommunications operators, relating to measurement periods of 3 to 6 months.
<b>OAo</b>	OAos are the Other Authorised Operators that purchase Carrier Services or Interconnect Circuits from the SMP operator.
<b>Order</b>	An order is defined as a contractual commitment made to a customer to provide a product or service, or a change to an existing service.
<b>Order Completed</b>	Order completion is defined as the point when all items are available for use by the customer as confirmed by the operator.
<b>Significant Market Power</b>	The Open Network Provision (ONP) framework requires National Regulatory Authorities (NRAs) to designate certain operators as having Significant Market Power (SMP). Operators with SMP face additional obligations aimed, inter alia, at control of significant market power. <i>eircom</i> has been designated as having Significant Market Power (SMP) in the fixed services and networks markets.