



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 July to December 2003.

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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- the complaint is withdrawn, or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.

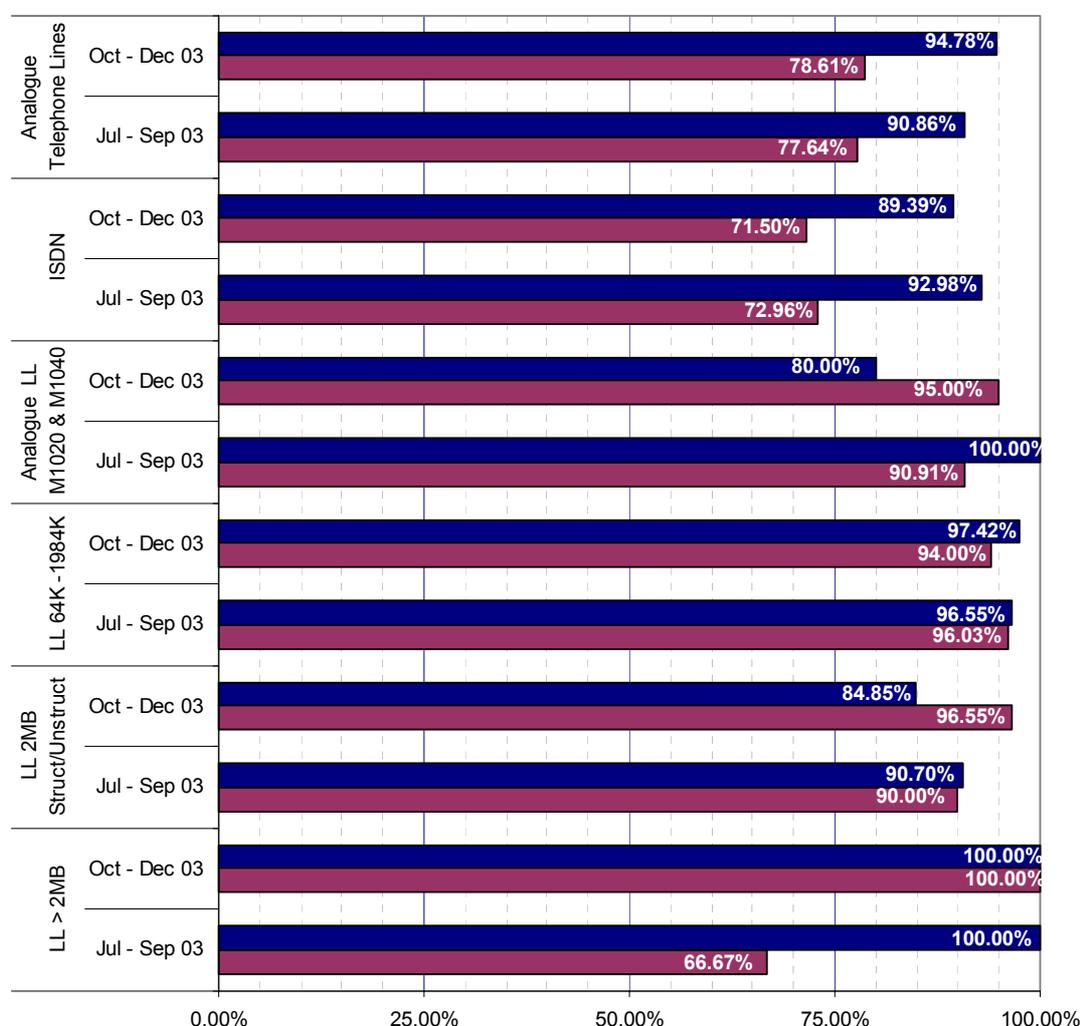
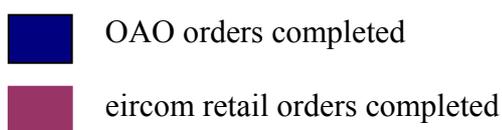
2 SMP to OAO – Order Completion

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 - OAO orders
	Variance from promise date – eircom retail orders

		<=0 days	1 day	5 days	10 days	20 days	30 days	50 days	100 days	>100 days
Analogue Telephone Lines	Oct - Dec 03	94.78%	0.62%	1.23%	1.11%	1.23%	0.33%	0.25%	0.45%	-
		78.61%	3.77%	6.37%	4.05%	2.95%	1.34%	1.37%	1.00%	0.55%
	Jul - Sep 03	90.86%	1.13%	2.60%	2.30%	1.52%	0.48%	0.74%	0.30%	0.09%
ISDN	Oct - Dec 03	89.39%	1.52%	6.06%	0.00%	3.03%	-	-	-	-
		71.50%	3.45%	9.80%	6.55%	4.12%	1.79%	1.25%	1.00%	0.54%
	Jul - Sep 03	92.98%	0.00%	2.34%	1.17%	0.00%	1.17%	0.00%	2.34%	-
Analogue LL M1020 & M1040	Oct - Dec 03	80.00%	20.00%	-	-	-	-	-	-	-
		95.00%	0.63%	0.00%	0.63%	0.63%	1.25%	0.00%	1.25%	0.63%
	Jul - Sep 03	100.00%	-	-	-	-	-	-	-	-
LL 64K -1984K	Oct - Dec 03	90.91%	0.91%	0.00%	1.82%	0.91%	0.00%	0.91%	1.82%	2.73%
		97.42%	0.86%	0.43%	0.43%	0.00%	0.86%	-	-	-
	Jul - Sep 03	94.00%	0.69%	0.46%	1.39%	1.62%	0.23%	0.92%	0.46%	0.23%
LL 2MB Struct/Unstruct	Oct - Dec 03	96.55%	1.06%	0.53%	0.53%	0.27%	0.27%	0.00%	0.53%	0.27%
		96.03%	1.04%	0.42%	0.42%	0.63%	1.04%	0.42%	-	-
	Jul - Sep 03	84.85%	0.00%	0.00%	0.00%	3.03%	0.00%	0.00%	0.00%	12.12%
LL > 2MB	Oct - Dec 03	96.55%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.45%	-
		90.70%	4.65%	0.00%	2.33%	0.00%	0.00%	0.00%	2.33%	-
	Jul - Sep 03	90.00%	0.00%	0.00%	0.00%	0.00%	10.00%	-	-	-
LL > 2MB	Oct - Dec 03	100.00%	-	-	-	-	-	-	-	-
		100.00%	-	-	-	-	-	-	-	-
	Jul - Sep 03	100.00%	-	-	-	-	-	-	-	-
		66.67%	0.00%	0.00%	33.33%	-	-	-	-	-

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

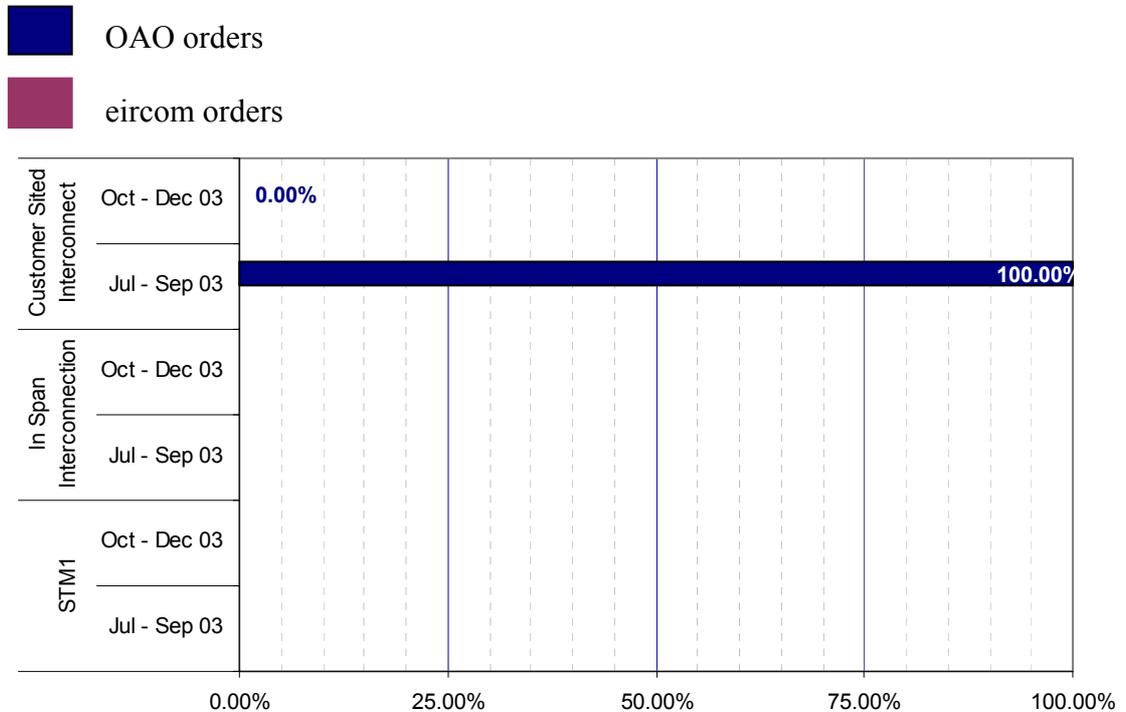
Leased Lines <2Mbit/s

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 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	Oct - Dec 03	0.00%	0.00%	20.00%	0.00%	6.67%	60.00%	13.33%	-	-
	Jul - Sep 03	100.00%	-	-	-	-	-	-	-	-
In Span Interconnection	Oct - Dec 03	-	-	-	-	-	-	-	-	-
	Jul - Sep 03	-	-	-	-	-	-	-	-	-
STM1	Oct - Dec 03	-	-	-	-	-	-	-	-	-
	Jul - Sep 03	-	-	-	-	-	-	-	-	-

SMP operator target promise time for order completion	
Customer Sited Interconnect	Promise Time Variable
In Span Interconnection	Promise Time Variable
STM1	Promise Time Variable

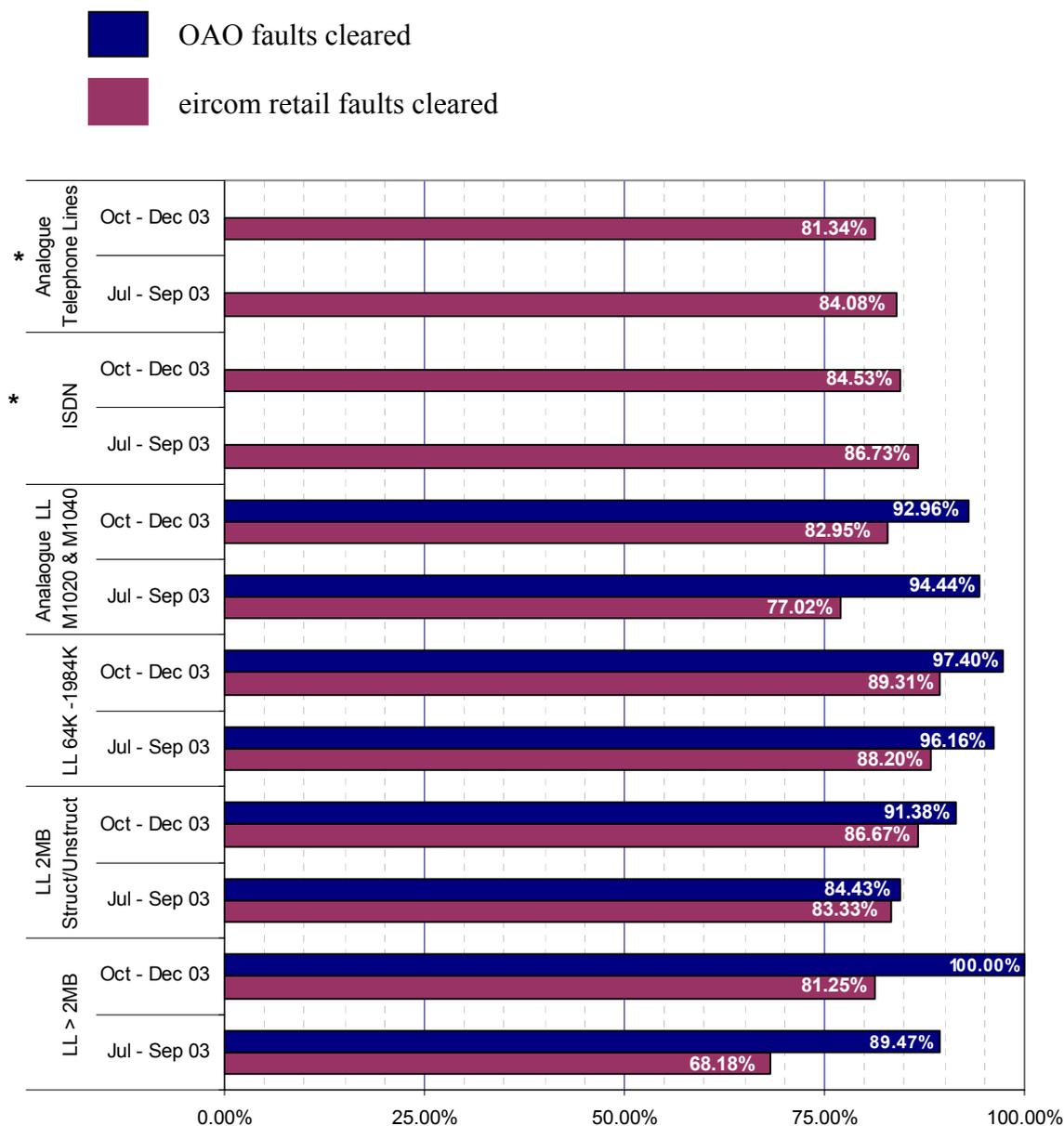
3 SMP to OAO – Fault Clearance

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
Analogue Telephone Lines *	Oct - Dec 03	81.34%	1.41%	1.26%	2.04%	2.18%	11.78%
	Jul - Sep 03	84.08%	1.28%	1.30%	1.98%	2.31%	9.05%
ISDN *	Oct - Dec 03	84.53%	1.28%	1.07%	1.72%	1.74%	9.65%
	Jul - Sep 03	86.73%	1.14%	0.89%	1.65%	1.57%	8.02%
Analogue LL M1020 & M1040	Oct - Dec 03	92.96%	1.41%	2.82%	1.41%	0.00%	1.41%
	Jul - Sep 03	82.95%	1.73%	1.00%	2.19%	1.00%	11.12%
LL 64K -1984K	Oct - Dec 03	94.44%	0.00%	1.39%	1.39%	1.39%	1.39%
	Jul - Sep 03	77.02%	2.47%	2.07%	2.76%	2.07%	13.61%
LL 2MB Struct/Unstruct	Oct - Dec 03	97.40%	0.60%	0.13%	0.33%	0.27%	1.27%
	Jul - Sep 03	89.31%	1.86%	1.12%	1.23%	0.84%	5.62%
LL > 2MB	Oct - Dec 03	96.16%	0.35%	0.49%	0.77%	0.35%	1.89%
	Jul - Sep 03	88.20%	1.81%	1.07%	1.36%	1.18%	6.38%
LL > 2MB	Oct - Dec 03	91.38%	0.99%	0.74%	1.48%	0.49%	4.93%
	Jul - Sep 03	86.67%	0.89%	0.89%	0.89%	0.89%	9.78%
LL > 2MB	Oct - Dec 03	84.43%	1.89%	2.12%	2.36%	1.42%	7.78%
	Jul - Sep 03	83.33%	1.96%	1.47%	2.94%	1.47%	8.82%
LL > 2MB	Oct - Dec 03	100.00%	-	-	-	-	-
	Jul - Sep 03	81.25%	0.00%	0.00%	0.00%	3.13%	15.63%
LL > 2MB	Oct - Dec 03	89.47%	0.00%	0.00%	0.00%	0.00%	10.53%
	Jul - Sep 03	68.18%	0.00%	6.82%	6.82%	4.55%	13.64%

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

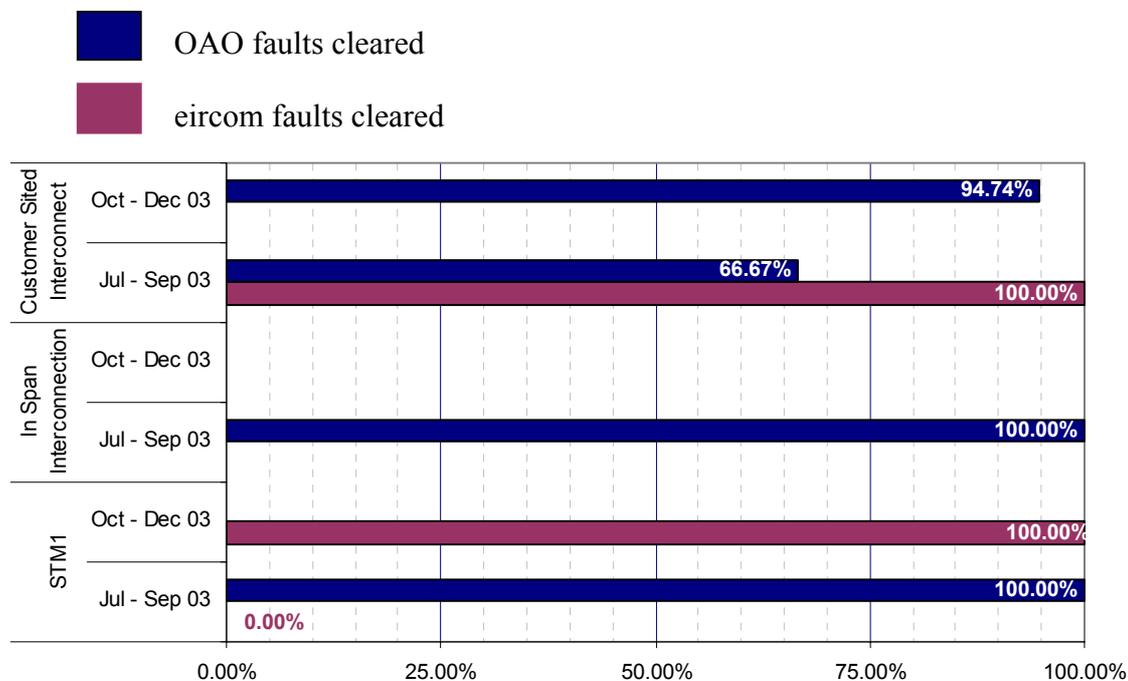
SMP operator target promise time for fault clearance

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 from promised 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	Oct - Dec 03	94.74%	0.00%	5.26%	-	-	-
	Jul - Sep 03	66.67%	0.00%	0.00%	0.00%	0.00%	33.33%
In Span Interconnection	Oct - Dec 03	100.00%	-	-	-	-	-
	Jul - Sep 03	100.00%	-	-	-	-	-
STM1	Oct - Dec 03	100.00%	-	-	-	-	-
	Jul - Sep 03	100.00%	-	-	-	-	-

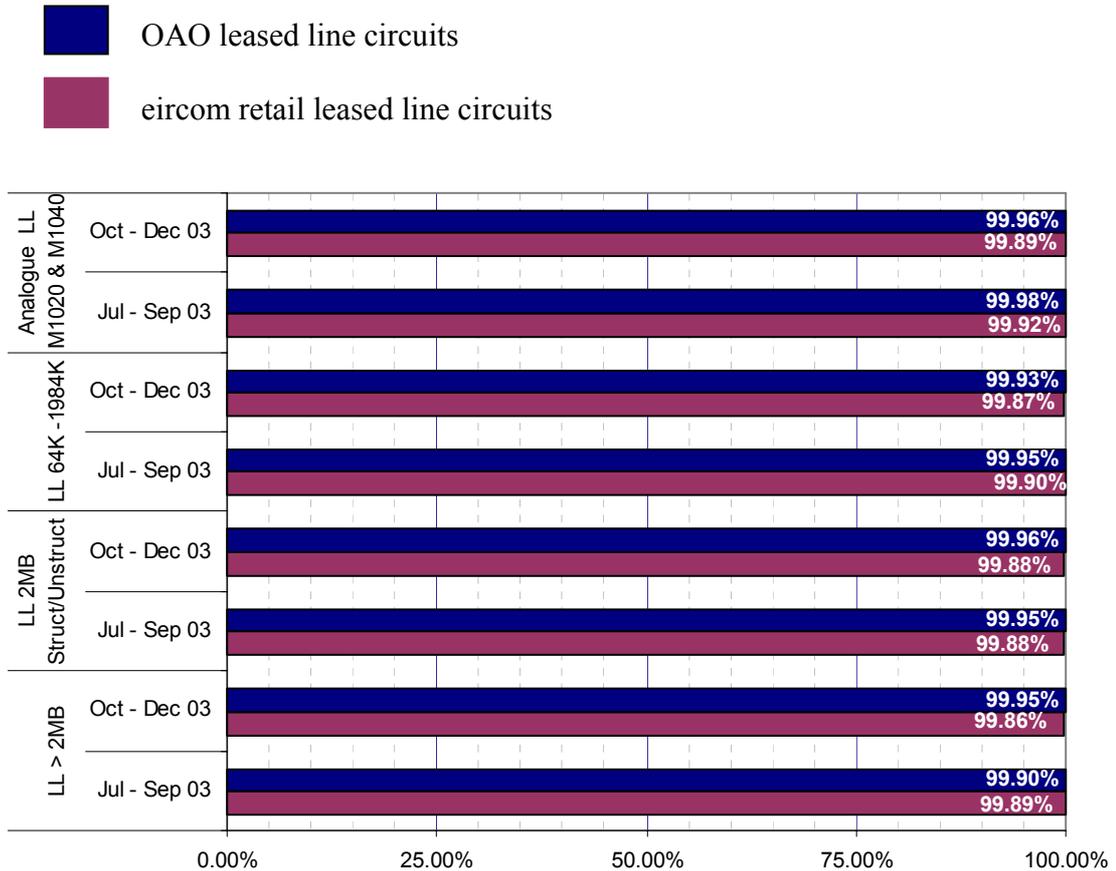
SMP operator target promised time for fault clearance.

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

4 Availability of Leased Lines and Interconnect Circuits

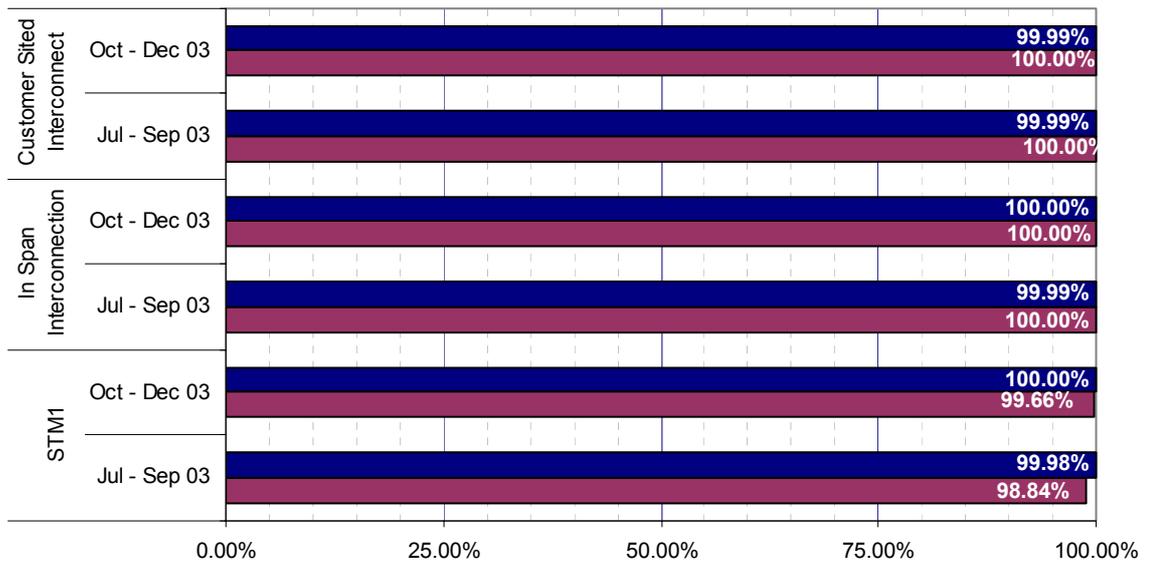
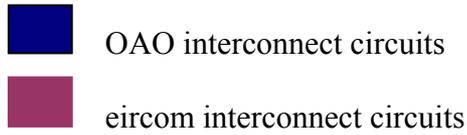
4.1 Availability of Leased Lines

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.



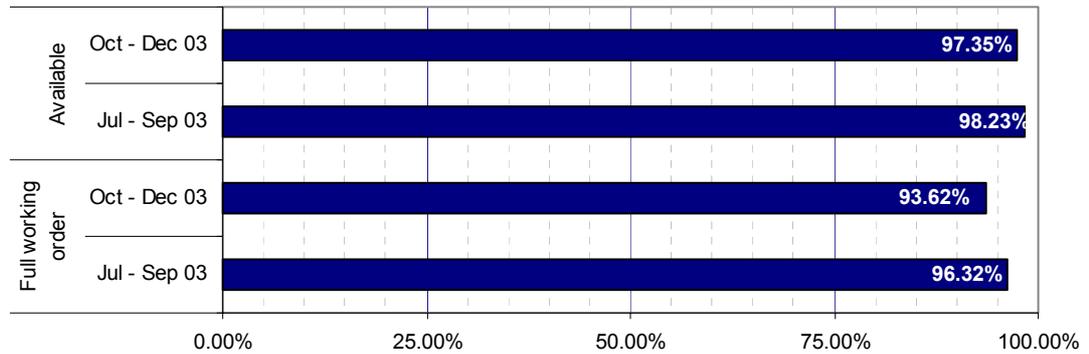
5 Carrier Services and Interconnect Complaints

No complaints were registered for the period from July to December 2003.

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.	Jul-Sept	6395
	Oct-Dec	6352

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 July to September and October to December 2003. Each operator has collected service performance data against the defined MLOP Industry Forum measures. (see ComReg website www.comreg.ie¹)

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.

Service Offered	Threshold for reporting
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:

¹ 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

Access Line	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.
Calling Line Identity (CLI)	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.
Carrier Service Circuits	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".
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.
Complaint Processed	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.
CPS- Carrier Pre-selection	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.
Customer Reported 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.

Direct Service	A Direct Service is one for which the operator provides a direct link from exchange equipment to a customer's premises (switched).
Fault Cleared	Fault Clearance is defined as being when all items are available for use by the customer as confirmed by the operator.
Indirect Service	An Indirect Service is a telephony service provided to an end user via another Authorised operator's switched access network.
Interconnect Circuit	An interconnect circuit is a single 2 Mbit/s circuit as specified in the SMP's Reference Interconnect Offer (RIO).
Leased Line	A leased line is a single dedicated connection between two (or more) customer sites. Leased lines are also purchased to connect an operator's network points of presence to a customer's site.
MLOP	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.
OAo	OAos are the Other Authorised Operators that purchase Carrier Services or Interconnect Circuits from the SMP operator.
Order	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.
Order Completed	Order completion is defined as the point when all items are available for use by the customer as confirmed by the operator.
Significant Market Power	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.