Information Notice

SMP Operator QoS Performance

Report on quality of service performance in provision of service to Other Licensed Operators for the period from July to December 2002

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Contents

1   Introduction

1.1 Programme Description

The Measuring Licensed Operator Performance (MLOP) programme 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 Licensed Operators (OLO'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 as confirmed by the operator.

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- the complaint is withdrawn, or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.
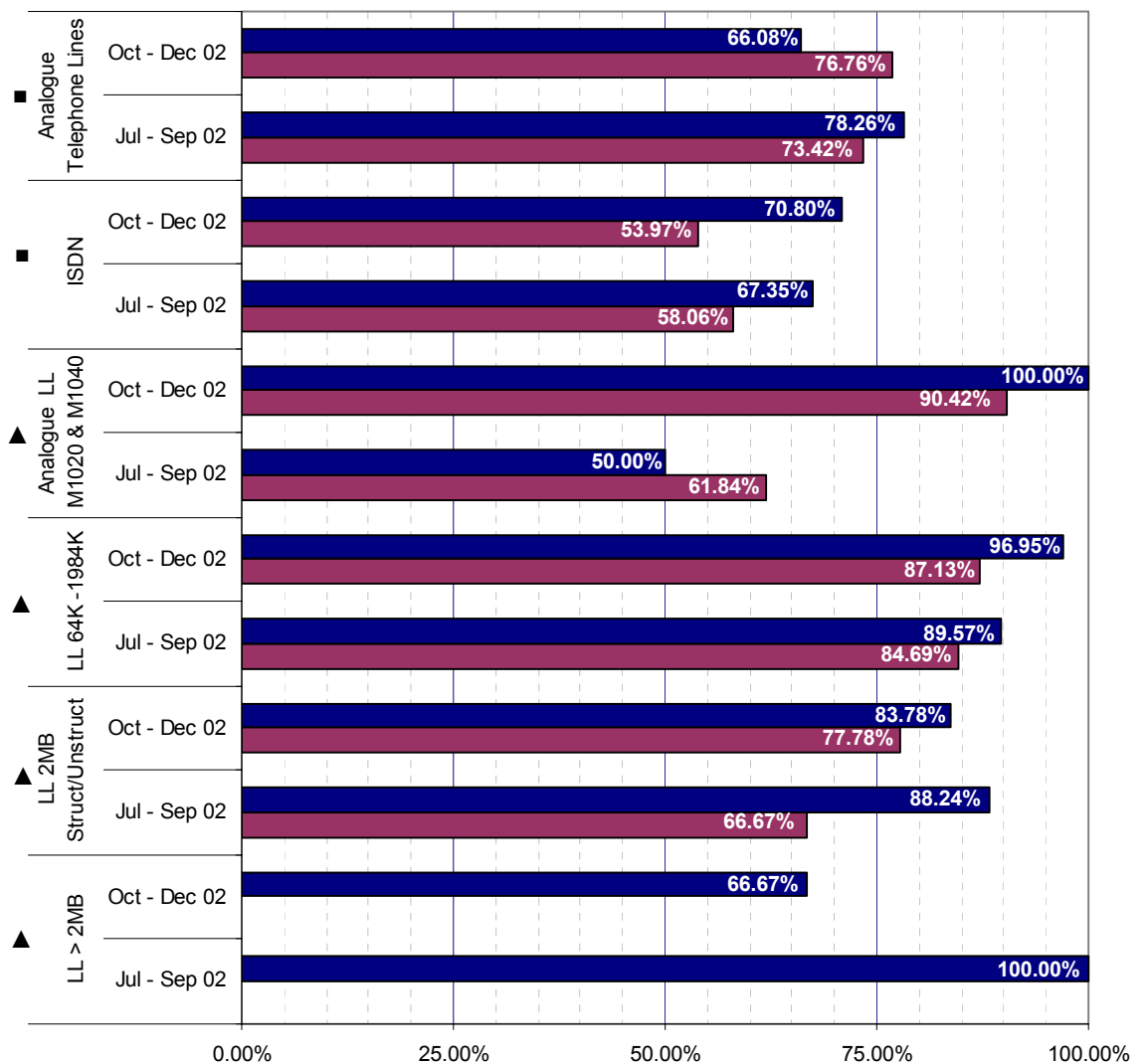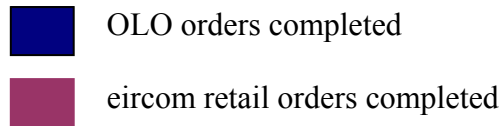
2   SMP to OLO – Order Completion

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.

■ OLO orders completed

■ eircom retail orders completed

Analogue Telephone Lines
- Oct - Dec 02: 66.08% / 76.76%
- Jul - Sep 02: 78.26% / 73.42%

ISDN
- Oct - Dec 02: 70.80% / 53.97%
- Jul - Sep 02: 67.35% / 58.06%

Analogue LL M1020 & M1040
- Oct - Dec 02: 100.00% / 90.42%
- Jul - Sep 02: 50.00% / 61.84%

LL 64K -1984K
- Oct - Dec 02: 96.95% / 87.13%
- Jul - Sep 02: 89.57% / 84.69%

LL 2MB Struct/Unstruct
- Oct - Dec 02: 83.78% / 77.78%
- Jul - Sep 02: 88.24% / 66.67%

LL > 2MB
- Oct - Dec 02: 66.67%
- Jul - Sep 02: 100.00%

(Horizontal axis: 0.00%, 25.00%, 50.00%, 75.00%, 100.00%)

■ For Analogue telephone lines and ISDN lines eircom have included customer delay time in the time taken to provide service

▲ Eircom have excluded leased line orders which incurred a customer delay

2.1.2 Carrier services orders - Variance from promised order completion date

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

■ (dark blue) Variance from promise date - OLO orders

■ (purple) 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 02	66.08%	2.34%	6.43%	6.73%	7.60%	4.09%	4.09%	2.63%	-
		76.76%	4.62%	5.28%	3.42%	3.01%	1.88%	2.00%	1.76%	1.27%
	Jul - Sep 02	78.26%	4.35%	3.62%	3.26%	5.43%	1.09%	2.17%	1.81%	-
		73.42%	6.77%	6.15%	3.68%	3.25%	1.85%	2.02%	1.63%	1.23%
ISDN ■	Oct - Dec 02	70.80%	1.77%	4.42%	3.54%	1.77%	1.77%	12.39%	3.54%	-
		53.97%	2.70%	8.83%	8.43%	8.10%	4.76%	5.87%	5.05%	2.28%
	Jul - Sep 02	67.35%	1.02%	3.06%	12.24%	1.02%	2.04%	5.10%	3.06%	5.10%
		58.06%	2.71%	7.71%	7.80%	8.77%	4.92%	4.70%	3.93%	1.41%
Analogue LL M1020 & M1040 ▲	Oct - Dec 02	100.00%	-	-	-	-	-	-	-	-
		90.42%	1.20%	1.80%	1.20%	0.60%	0.60%	1.20%	1.80%	1.20%
	Jul - Sep 02	50.00%	0.00%	0.00%	0.00%	16.67%	0.00%	16.67%	16.67%	-
		61.84%	1.32%	15.79%	6.58%	2.63%	2.63%	2.63%	3.95%	2.63%
LL 64K -1984K ▲	Oct - Dec 02	96.95%	1.15%	0.38%	0.38%	0.38%	0.38%	0.00%	0.00%	0.38%
		87.13%	0.25%	1.73%	1.73%	1.98%	2.48%	2.48%	0.74%	1.49%
	Jul - Sep 02	89.57%	2.84%	1.90%	1.90%	1.42%	1.42%	0.00%	0.47%	0.47%
		84.69%	0.49%	2.72%	2.72%	1.48%	1.48%	0.99%	1.73%	3.70%
LL 2MB Struct/Unstruct ▲	Oct - Dec 02	83.78%	0.00%	0.00%	2.70%	0.00%	0.00%	5.41%	0.00%	8.11%
		77.78%	5.56%	0.00%	0.00%	0.00%	0.00%	16.67%	-	-
	Jul - Sep 02	88.24%	0.00%	0.00%	0.00%	3.92%	1.96%	0.00%	1.96%	5.88%
		66.67%	0.00%	0.00%	8.33%	8.33%	4.17%	4.17%	0.00%	8.33%
LL > 2MB ▲	Oct - Dec 02	66.67%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	33.33%	-
		-	-	-	-	-	-	-	-	-
	Jul - Sep 02	100.00%	-	-	-	-	-	-	-	-
		-	-	-	-	-	-	-	-	-

■ For Analogue telephone lines and ISDN lines eircom have included customer delay time in the time taken to provide an order

▲ Eircom have excluded leased line orders which incurred a customer delay

SMP operator target promise time for order completion

|	
Analogue & ISDN Lines	Customer required date
Leased Lines (M1020/M1040 & 64Kbit/s – 1984Kbit/s)	22 days or customer requested date if later
Leased Lines - 2 Mbit (Structured & Unstructured)	26 days or customer requested date of 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.

▮ OLO orders

▮ eircom orders
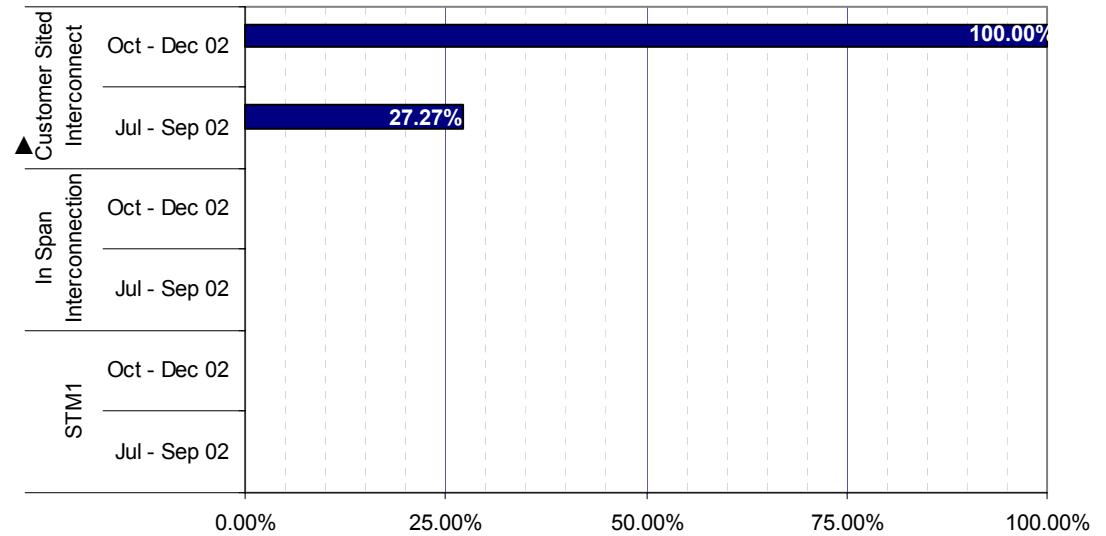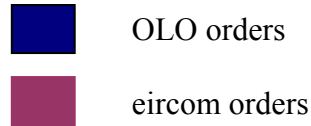
2.2.2 *Interconnect circuit orders - Variance from promised order completion date*

This table indicates the percentage variance from the promised order completion date for interconnect circuit orders.

		<=0 days	1 day	5days	10 days	20 days	30 days	50 days	100 days	>100 days
Customer Sited Interconnect	Oct - Dec 02	100.00%	-	-	-	-	-	-	-	-
		-	-	-	-	-	-	-	-	-
	Jul - Sep 02	27.27%	18.18%	0.00%	54.55%	-	-	-	-	-
		-	-	-	-	-	-	-	-	-

▲ Interconnect orders may include orders that are customer delayed however insufficient information has been captured to enable customer delays to be identified

SMP operator target promise time for order completion

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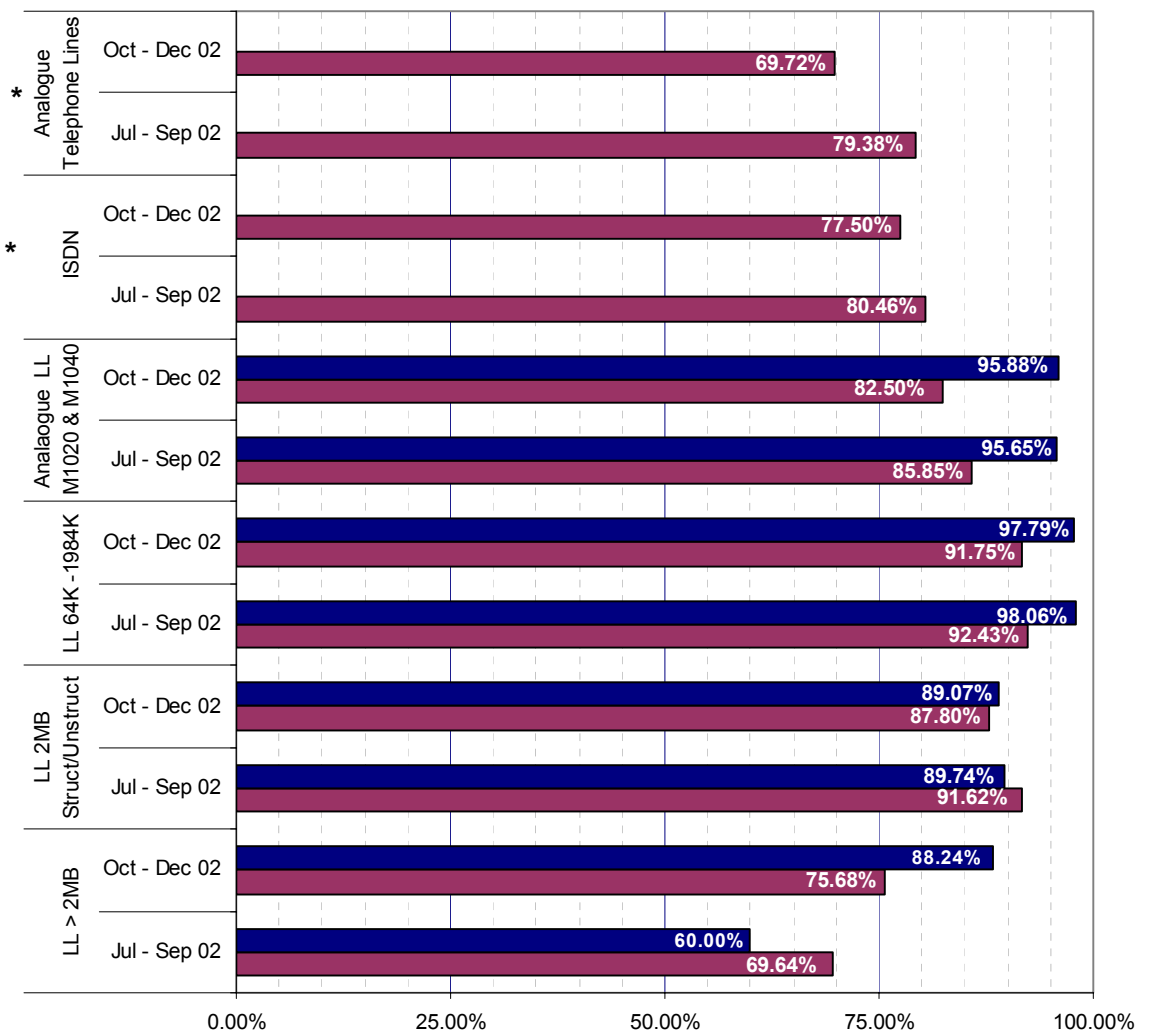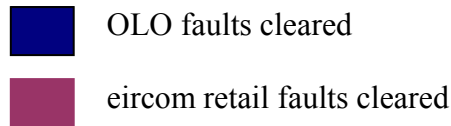STM1   Promise Time Variable

3   SMP to OLO – Fault Clearance

In evaluating these results consumers should take 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.

Legend:
- OLO faults cleared (dark blue)
- eircom retail faults cleared (maroon)

Category	Period	OLO faults cleared	eircom retail faults cleared
Analogue Telephone Lines *	Oct - Dec 02		69.72%
	Jul - Sep 02		79.38%
ISDN *	Oct - Dec 02		77.50%
	Jul - Sep 02		80.46%
Analaogue LL M1020 & M1040	Oct - Dec 02	95.88%	82.50%
	Jul - Sep 02	95.65%	85.85%
LL 64K -1984K	Oct - Dec 02	97.79%	91.75%
	Jul - Sep 02	98.06%	92.43%
LL 2MB Struct/Unstruct	Oct - Dec 02	89.07%	87.80%
	Jul - Sep 02	89.74%	91.62%
LL > 2MB	Oct - Dec 02	88.24%	75.68%
	Jul - Sep 02	60.00%	69.64%

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

3.1.2   Carrier Services faults - Variance from promised fault clearance time

This table indicates the percentage variance 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 02	69.72%	1.43%	1.41%	2.57%	3.13%	21.74%
	Jul - Sep 02	79.38%	1.29%	1.27%	2.04%	2.53%	13.48%
ISDN *	Oct - Dec 02	77.50%	1.50%	1.33%	1.80%	2.06%	15.82%
	Jul - Sep 02	80.46%	1.21%	1.03%	1.51%	1.86%	13.91%
Analogue LL M1020 & M1040	Oct - Dec 02	95.88%	0.00%	0.00%	0.00%	1.03%	3.09%
		82.50%	1.66%	1.13%	2.41%	2.64%	9.65%
	Jul - Sep 02	95.65%	2.17%	0.00%	0.00%	0.72%	1.45%
		85.85%	1.95%	0.98%	1.85%	1.95%	7.41%
LL 64K -1984K	Oct - Dec 02	97.79%	0.27%	0.00%	0.33%	0.60%	1.00%
		91.75%	0.74%	0.88%	1.22%	1.13%	4.28%
	Jul - Sep 02	98.06%	0.13%	0.32%	0.13%	0.19%	1.17%
		92.43%	1.09%	0.48%	0.64%	0.64%	4.73%
LL 2MB Struct/Unstruct	Oct - Dec 02	89.07%	0.48%	0.71%	1.19%	1.66%	6.89%
		87.80%	0.00%	0.61%	0.61%	2.44%	8.54%
	Jul - Sep 02	89.74%	1.05%	0.79%	1.32%	1.32%	5.79%
		91.62%	0.00%	1.68%	1.68%	0.56%	4.47%
LL > 2MB	Oct - Dec 02	88.24%	0.00%	5.88%	0.00%	0.00%	5.88%
		75.68%	0.00%	5.41%	2.70%	0.00%	16.22%
	Jul - Sep 02	60.00%	0.00%	0.00%	10.00%	0.00%	30.00%
		69.64%	5.36%	0.00%	1.79%	5.36%	17.86%

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

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**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.

■ OLO faults cleared

■ eircom faults cleared
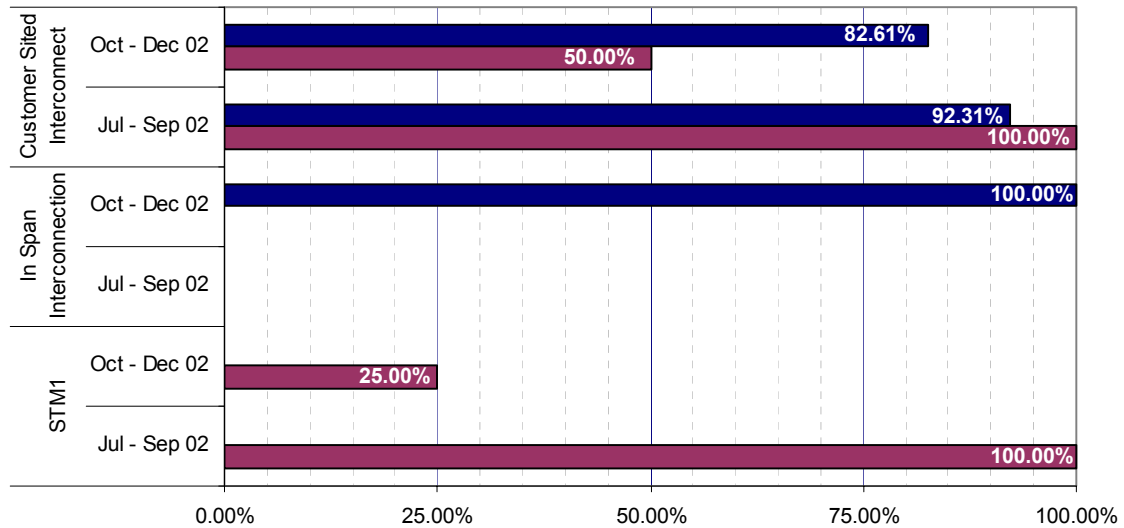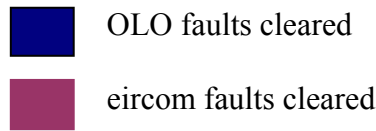
3.2.2 Interconnect circuit faults - Variance from promised fault clearance time

This table indicates the percentage variance 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 02	82.61%	0.00%	4.35%	4.35%	4.35%	4.35%
		50.00%	0.00%	0.00%	0.00%	0.00%	50.00%
	Jul - Sep 02	92.31%	0.00%	0.00%	3.85%	0.00%	3.85%
		100.00%	-	-	-	-	-
In Span Inerconnection	Oct - Dec 02	100.00%	-	-	-	-	-
		-	-	-	-	-	-
	Jul - Sep 02	-	-	-	-	-	-
		-	-	-	-	-	-
STM1	Oct - Dec 02	-	-	-	-	-	-
		25.00%	0.00%	0.00%	75.00%	-	-
	Jul - Sep 02	-	-	-	-	-	-
		100.00%	-	-	-	-	-

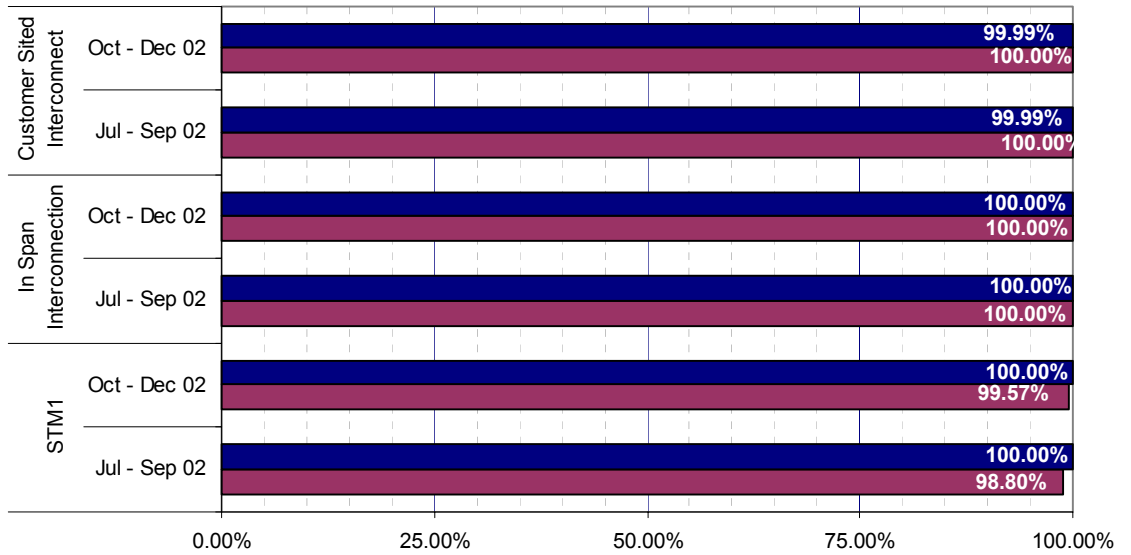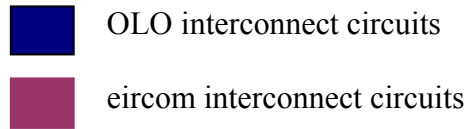| **SMP operator target promise time for fault clearance**	
Customer Sited Interconnect	8 hours
In Span Interconnection	8 hours
STM1	8 hours

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

■ OLO leased line circuits

■ eircom retail leased line circuits
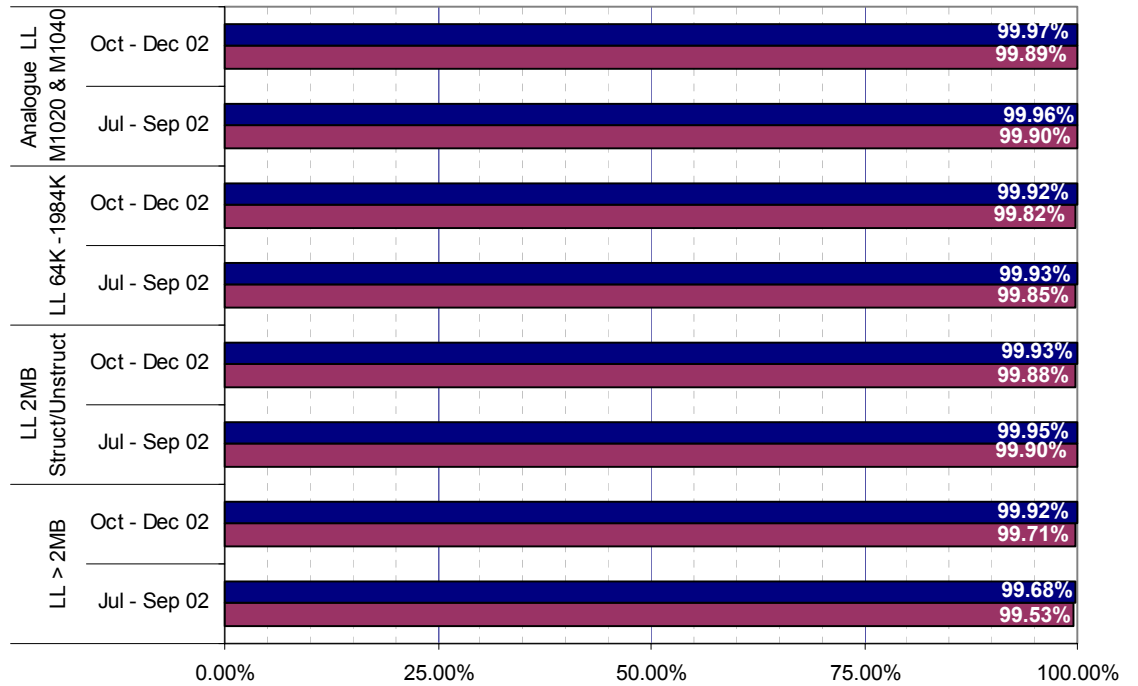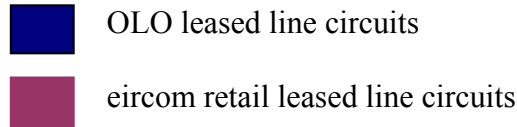
4.2 Availability of Interconnect Circuits

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

■ OLO interconnect circuits

■ eircom interconnect circuits

|		OLO	eircom
Customer Sited Interconnect	Oct - Dec 02	99.99%	100.00%
	Jul - Sep 02	99.99%	100.00%
In Span Interconnection	Oct - Dec 02	100.00%	100.00%
	Jul - Sep 02	100.00%	100.00%
STM1	Oct - Dec 02	100.00%	99.57%
	Jul - Sep 02	100.00%	98.80%

5   Carrier Services and Interconnect Complaints

No Complaints were registered for the period from July to September 2002. For the period from October to December 2002 one ISDN complaint was registered and this was processed within 28 days.

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
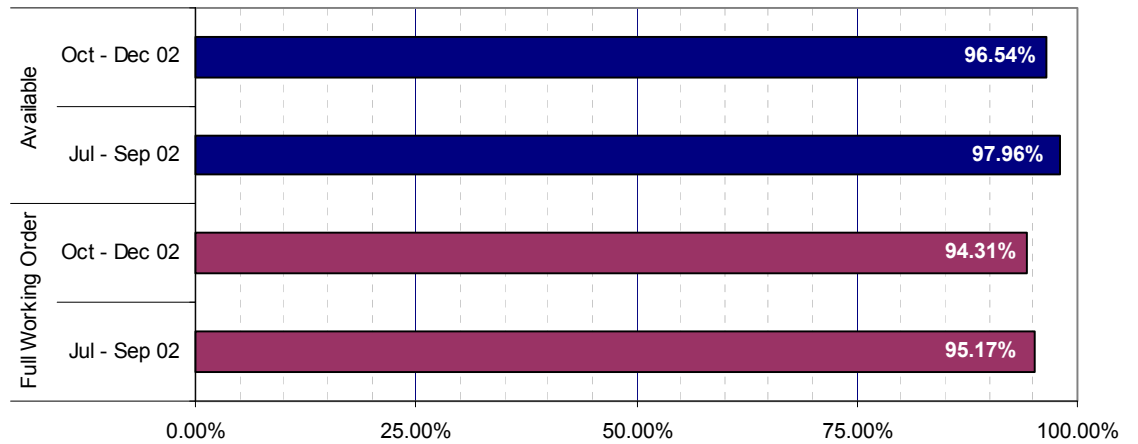
| Average number of coin or card operated | Oct – Dec 02 | 6551 |
| public payphones during the reporting period | Jun – Sep 02 | 6513 |

Appendix A – Operator submitted statement

Eircom Ltd

eircom is Ireland's leading communications company, providing a comprehensive range of advanced voice, data and Internet services. The company, which was formerly known as Telecom Eireann, was established in 1984 when it became a semi-state company.

Since 1984, eircom has continually invested in its infrastructure, giving Ireland one of the most advanced networks in Europe. eircom continues to invest in the development of the services, thereby increasing value and benefit to customers.

eircom also offers comprehensive nation-wide pay-phone services and a directory enquiry service to all customers. Finally, *eircom* offers services to Other Licensed Operators to carry telecommunications traffic for their customers.

For further information visit our website at eircom.ie

Appendix A – Operator submitted statement

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 Licensed 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 2002. Each operator has collected service performance against the defined MLOP Industry Forum measures (see ComReg website www.comreg.ie[1]).

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 of the participating operators and to make a judgement on the comparability of that data using information, which describes:

- How the data was captured

- How the data was processed

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[1] The MLOP definitions (v3.2) document is available on the ComReg website

- 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 to 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 OLOs, which are specified in eircom document - "Statement of Service Levels for the provision of Specified Services to Other Licensed 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 or 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 Preselection	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.
General Telecommunications Licence	This category of licence permits the holder to provide telecommunications networks and services involving the provision of one or more of the following to the public; a Public Telecommunications Network, voice telephony and/or any other network or service which requires the allocation to users of numbers from the national numbering scheme.
Indirect Service	An Indirect Service is a telephony service provided to an end user by an operator via another licensed 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 their network points of presence to a customer's site.
MLOP	The Measuring Licensed Operator Performance (MLOP) programme is an initiative led ComReg co-operation with the 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.
OLO	OLOs are the Other Licensed 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 (SMP).	The Open Network Provision (ONP) framework requires National Regulatory Authorities (NRAs) to designate certain operators as having Significant Market Power Operators with SMP face additional obligations aimed, inter alia, at control of significant market power. eircom has been designated as having Significant Market Power (SMP) in the fixed services and network markets.