



Commission for
Communications Regulation

Information Notice

eircom's Response to Operators' LLU Product Development Requests

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Update on Local Loop Unbundling

On 14th September 2005, ComReg issued an Information Notice (Document 05/71) advising the industry that eircom were to respond to a document outlining requirements from Access Seekers for Local Loop Unbundling (LLU), and related facilities, by 24th October 2005. This response was provided to ComReg on the 24th October 2005 and was presented to Access Seekers on 25th October 2005.

The document was circulated by eircom to other operators on 25th October 2005 however, to ensure that this is available to all interested parties; ComReg is now publishing the document.

While ComReg is still in the process of fully evaluating the response, at this stage it should be noted that many of the views represented within the document are not shared by ComReg, and it is ComReg's view that eircom's response is disappointing in a number of respects, which include:

- There is insufficient detail to permit the assessment of the reasonableness of the timescales and costs associated with the development of the Geographic Number Portability (GNP) product requested.
- The document fails to recognise the central importance of LLU as a product to enable operators to provide innovative, higher speed broadband products which, in turn, would benefit consumers in terms of price, choice and quality. It is ComReg's view that LLU can play a critical role in meeting the national objectives in relation to broadband.
- The response fails to recognise obligations which ComReg believes eircom has in terms of meeting their wholesale customers' requests.

In the context of moving this process forward, ComReg's will be seeking additional information from eircom in relation to their response as a matter of urgency and will continue to work closely with the Access Seekers on the issues.

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