



30 July 2020

Ms. Emma O'Toole,
Senior Regulatory and Policy Economist,
Eircom,
2022 Bianconi Avenue,
Citywest Business Campus,
Dublin 24,
D24 HX03.

By email only to: [REDACTED]

Cc: [REDACTED]
[REDACTED]

RE: ComReg 20/46 – Third Request for further clarification

Dear Emma,

I refer to your email dated July 24th last, in which you sought further clarification on points set out in ComReg Document 20/46, ComReg's RFTS and FACO Market Consultation and Draft Decision.

ComReg's response is set out in the Annex to this letter. Please note that this letter (save for the email addresses), together with the Annex, will today be published in the form of an Information Notice on ComReg's website, in order to provide transparency for all stakeholders.

I trust that the foregoing is in order.

Yours sincerely,

Sent by email, bears no signature

Dave O'Connell

Market Analysis Manager

Annex – Response to Third Eircom Clarification Request on ComReg Document 20/46 (the “Consultation”)

ComReg’s response to the third Eircom request for clarifications is set out below. Capitalised terms used below, unless otherwise defined, are defined in the Consultation.

1. “Could ComReg provide the total premises figure per EA, which includes all premises passed or otherwise, that it has used in its calculations?”

ComReg sets out below the relevant data.

Node Code	Total premises	AHS	947	AYL	355	BDA	98
ABE	6,597	AKW	6,332	BAA	1,272	BDB	1,000
ABK	724	ALD	559	BAD	515	BDN	3,390
ABP	69	ALE	511	BAE	1,871	BDT	26,324
ABX	1,751	ALS	524	BAH	347	BDY	1,482
ABY	2,193	ALW	209	BAI	3,703	BEE	851
ACE	707	AME	1,092	BAK	357	BEG	2,859
ACF	632	ANA	782	BAL	426	BEN	2,748
ACL	785	ANN	740	BAM	574	BER	914
ACY	643	ANR	3,467	BAN	1,351	BES	440
ADA	1,474	ANY	1,237	BAO	331	BEY	722
ADE	446	ARA	297	BAR	2,225	BFD	603
ADG	734	ARC	154	BAS	649	BFF	1,795
ADH	577	ARD	3,668	BAX	470	BFN	559
ADM	229	ARN	456	BAY	3,255	BFO	577
ADN	1,027	ART	1,312	BBA	1,609	BFR	880
ADR	1,533	ARW	1,261	BBE	837	BFT	1,353
ADT	768	ASD	429	BBH	14,884	BGA	553
ADW	428	ASG	381	BBN	1,745	BGE	1,221
ADY	270	ASM	312	BBO	2,667	BGH	1,735
AFD	1,332	ASN	1,430	BBS	783	BGL	1,308
AFE	2,580	ASQ	385	BBT	191	BGN	370
AFN	939	ATD	4,681	BBY	635	BGR	798
AGA	372	ATE	856	BCA	221	BGS	1,838
AGH	496	ATH	3,889	BCE	686	BGT	1,546
AGL	723	ATL	572	BCG	604	BGV	421
AGN	288	ATN	331	BCH	787	BGW	296
AGY	1,453	ATS	305	BCK	317	BGY	752
AHA	1,340	ATY	4,484	BCL	1,502	BHE	898
AHC	299	AUG	189	BCN	717	BHG	1,456
AHH	806	AUV	11,302	BCR	621	BHH	418
AHM	1,300	AVA	1,142	BCS	500	BHL	476
AHO	389	AVO	1,022	BCY	954	BHM	339

BHN	2,187	BMY	347	BTN	631	CAS	265
BHR	1,540	BNA	809	BTR	508	CAT	2,534
BHS	1,137	BNC	10,127	BTS	990	CAV	7,180
BHT	815	BND	4,740	BTT	378	CAW	794
BHY	592	BNE	1,075	BTW	220	CAY	183
BIB	52	BNG	715	BTY	182	CBA	171
BIG	377	BNN	4,001	BUA	4,555	CBE	363
BIN	447	BNR	530	BUB	281	CBM	1,878
BIR	3,498	BNS	525	BUD	165	CBN	232
BIT	368	BNY	573	BUN	70	CBO	421
BIY	413	BNZ	842	BUO	2,497	CBR	9,269
BJD	2,267	BOF	4,060	BUT	2,204	CBT	701
BJA	1,023	BOH	651	BUY	488	CBY	680
BKD	436	BOK	903	BVN	492	CCE	317
BKG	371	BOL	1,114	BVR	1,282	CCG	309
BKN	526	BOM	0	BVT	1,170	CCH	504
BKR	629	BON	402	BWG	536	CCI	146
BKS	796	BOY	185	BWM	900	CCL	1,433
BKT	456	BPC	677	BWN	685	CCM	1,591
BLA	7,657	BPN	902	BWR	1,203	CCR	1,921
BLB	20,824	BPO	712	BXG	245	CCS	4,930
BLC	1,211	BRA	795	BYA	1,010	CDA	1,994
BLD	665	BRD	594	BYB	940	CDF	941
BLE	1,164	BRE	2,539	BYC	1,062	CDH	2,510
BLF	604	BRF	489	BYD	704	CDN	1,889
BLG	831	BRH	1,257	BYE	2,624	CDT	1,315
BLH	882	BRI	11,867	BYF	933	CDU	202
BLI	1,903	BRM	592	BYG	553	CDW	78
BLL	850	BRN	11,262	BYH	609	CEA	273
BLN	764	BRS	1,212	BYM	592	CEE	6,399
BLO	421	BRT	863	BYN	893	CEL	7,955
BLP	21,612	BRU	1,368	BYO	543	CEN	652
BLR	4,272	BRY	390	BYR	416	CER	392
BLS	962	BSA	744	BYS	1,176	CFA	706
BLT	154	BSB	775	BYV	956	CFD	1,102
BLV	568	BSE	4,330	BYW	654	CFG	492
BLX	306	BSH	2,651	BYX	533	CFL	657
BLY	447	BSN	2,940	CAA	467	CFN	1,123
BMA	619	BSO	955	CAB	15,663	CFO	1,656
BMD	657	BSP	1,041	CAE	3,934	CFY	1,069
BME	1,124	BSZ	5,654	CAG	217	CGA	3,514
BMH	709	BTA	478	CAH	296	CGB	121
BML	1,755	BTB	938	CAL	2,042	CGE	650
BMN	1,693	BTE	1,939	CAM	247	CGG	501
BMO	808	BTH	221	CAN	637	CGH	856
BMT	930	BTM	782	CAR	713	CGI	6,859

CGL	859	CLS	2,028	CRE	2,156	CWN	902
CGM	263	CLT	10,002	CRF	137	CWT	3,251
CGN	1,561	CLU	716	CRI	146	CYA	1,177
CGS	590	CLW	833	CRK	693	CYE	61
CGY	1,059	CLX	1,305	CRL	10,553	CYG	164
CHA	498	CLY	2,850	CRM	1,442	CYW	299
CHD	11,099	CMA	1,410	CRN	600	DAH	2,054
CHE	770	CMK	442	CRO	1,091	DAP	307
CHF	14,405	CML	985	CRR	196	DBC	16,363
CHG	828	CMN	562	CRT	4,177	DBG	830
CHH	1,028	CMO	340	CRV	2,127	DBN	25,491
CHL	996	CMP	473	CRW	13,266	DBR	13
CHR	2,894	CMR	1,786	CRX	180	DBT	3,844
CHT	2,804	CMS	3,168	CRY	1,494	DCE	432
CHW	330	CMY	1,874	CSA	767	DCK	805
CHX	902	CNA	834	CSB	586	DCL	668
CID	2,473	CNB	239	CSE	533	DCN	1,091
CIG	869	CNE	1,500	CSH	1,019	DDA	916
CIL	303	CNG	957	CSJ	392	DDK	14,420
CIM	188	CNN	388	CSK	573	DDM	15,718
CIN	1,272	CNP	0	CSL	3,208	DDT	1,002
CIS	127	CNR	571	CSO	850	DDY	43
CJN	844	CNS	472	CSP	1,558	DEZ	6,161
CKA	50	CNV	1,241	CSR	3,958	DFY	1,726
CKC	4,000	CNW	1,420	CSS	650	DGE	2,174
CKE	148	CNX	342	CSW	1,357	DGH	597
CKH	566	CNY	711	CSY	3,085	DGL	3,380
CKN	3,670	COG	525	CTB	1,287	DGN	1,160
CKO	384	COL	328	CTD	568	DGS	12,516
CKS	95	CON	1,231	CTE	671	DGY	526
CKW	447	COO	365	CTH	12	DHA	219
CKY	3,393	COS	3,828	CTL	1,997	DHL	308
CLA	759	COT	651	CTN	1,131	DHR	1,514
CLB	735	COU	253	CTW	526	DKE	866
CLC	940	COV	5,945	CTY	6,987	DKN	618
CLD	9,555	COY	1,341	CUA	210	DLA	13,517
CLE	1,613	CPH	525	CUB	496	DLE	1,058
CLG	2,248	CPL	1,083	CUE	112	DLG	214
CLH	685	CPM	1,111	CUR	1,428	DLK	2,664
CLK	12,616	CPN	809	CUS	1,592	DLO	1,916
CLL	750	CPO	81	CUX	341	DLR	2,468
CLM	10,062	CPT	533	CVN	1,964	DMD	665
CLN	1,890	CPW	666	CVW	567	DME	867
CLO	1,197	CRA	16,060	CWD	0	DMO	1,368
CLP	0	CRC	597	CWJ	0	DMR	1,437
CLR	726	CRD	750	CWL	1,533	DMW	2,195

DNA	729	FBK	3,789	GEY	568	HLP	252
DND	610	FBO	615	GGF	971	HMT	664
DNM	491	FCA	2,699	GHL	659	HOB	209
DNN	356	FDR	642	GIL	148	HOD	238
DNR	1,807	FEH	723	GLA	147	HPD	1
DNU	9,842	FES	1,787	GLC	186	HPL	875
DNV	972	FET	1,931	GLF	254	HRD	2,014
DNX	1,724	FFD	854	GLI	860	HSQ	1,060
DOM	1,923	FFO	1,965	GLN	956	HYD	4,708
DON	1,051	FGE	528	GLO	214	IBF	185
DRA	726	FGH	345	GLS	651	IGE	592
DRB	154	FHD	1,317	GME	679	IGH	515
DRH	776	FHN	1,017	GMH	1,537	IHR	209
DRI	404	FHX	260	GMI	262	INC	1,860
DRL	1,773	FIN	395	GMR	4,228	INE	2,084
DRM	270	FKE	483	GMY	1,177	ING	648
DRS	816	FLH	1,657	GNA	1,627	INH	251
DRW	937	FMH	470	GNE	0	INL	12
DSN	3,014	FML	666	GNG	305	INM	144
DUK	491	FMT	475	GNH	964	INR	948
DUN	645	FMX	258	GNK	2,746	INV	982
DUR	759	FMY	4,089	GNO	837	ISK	825
DUW	200	FNA	466	GNY	482	ISL	1,968
DVA	7,379	FNG	18,718	GRD	232	ISN	1,265
DVN	1,205	FNS	575	GRE	481	JKN	892
DWT	766	FNT	1,018	GRS	10,040	JNN	400
DYX	11,702	FOX	5,840	GRT	2,644	JSN	1,330
ECT	580	FPK	1,308	GRY	6,280	JTN	991
EDY	3,895	FRB	1,149	GSL	634	JWL	353
EFD	2,642	FRS	346	GSN	1,391	KAE	784
EFI	324	FVA	330	GSX	625	KAP	26
EFN	1,107	FWN	322	GTA	313	KAS	743
EKK	0	FXD	1,851	GTN	1,214	KBD	415
EMJ	412	FXH	268	GTS	1,088	KBE	33
EMN	498	FYB	416	GUE	644	KBK	670
EMV	1,788	GAL	5,272	GUN	288	KBN	1,241
EMY	569	GAR	1,277	GVE	633	KBS	1,630
ENS	13,198	GBE	777	GWH	738	KBY	2,514
EPT	2,425	GBH	1,203	GWN	994	KCE	648
ERL	406	GBY	502	HBN	330	KCH	527
ERS	583	GCE	1,152	HCS	789	KCK	313
ESK	767	GCF	443	HCX	780	KCL	368
ETN	1,628	GCK	608	HDD	1,165	KCN	885
ETW	1,618	GCR	274	HFD	198	KCO	357
ETY	7,543	GDH	796	HFT	821	KCR	723
FBD	191	GDN	716	HKN	1,056	KCW	950

KCY	590	KLS	938	KTN	639	LOS	212
KDH	456	KLU	842	KTR	878	LPN	324
KDK	617	KLY	930	KTX	389	LPT	0
KDN	443	KMA	1,191	KUC	1,884	LRH	255
KDO	563	KMD	598	KVA	1,591	LRN	101
KDT	915	KME	3,187	KVN	1,119	LSL	748
KDY	1,164	KMG	661	KWH	998	LSN	470
KEH	579	KMK	1,613	KYG	1,002	LSR	0
KEK	1,428	KML	861	KYK	552	LTH	1,834
KEL	1,080	KMN	999	LAG	115	LTM	268
KEN	270	KMO	0	LAN	564	LTN	871
KEY	958	KMS	0	LAY	174	LTW	556
KFA	394	KMT	1,210	LBN	719	LVA	1,297
KFE	1,073	KMU	1,194	LBO	1,771	LVH	448
KGD	1,883	KMW	263	LBU	1,384	LVN	846
KGL	597	KMY	231	LCN	11,716	LWD	540
KGN	1,864	KNA	824	LCY	679	LWN	361
KGT	2,546	KNC	11	LDA	215	LYR	256
KGV	640	KND	198	LDN	812	MAH	4,057
KGX	320	KNE	1,243	LED	2,117	MAL	672
KHA	331	KNF	359	LEG	626	MAM	127
KHE	173	KNG	786	LEP	1,604	MAN	172
KHN	648	KNK	1,400	LET	595	MBC	405
KIA	353	KNL	1,250	LEX	6,171	MBG	2,564
KIC	3,521	KNM	579	LGA	4,613	MBS	732
KIH	432	KNT	638	LGB	58	MBT	635
KIK	1,895	KNY	13,997	LGN	956	MBW	1,063
KIL	1,649	KOK	3,286	LGW	815	MBY	1,946
KIM	254	KON	350	LHA	418	MCH	1,050
KIN	1,094	KOR	431	LHY	460	MCM	1,121
KIR	702	KQY	695	LIF	1,560	MCN	1,231
KKE	2,872	KRA	408	LIS	3,986	MDN	6,833
KKL	707	KRG	2,739	LKD	9,852	MDV	507
KKY	272	KRH	2,540	LKR	481	MEE	358
KLA	1,085	KRM	850	LKY	12,678	MEN	261
KLB	546	KRN	552	LMB	656	MER	5,222
KLC	2,088	KRR	445	LME	1,423	MEX	0
KLE	4,403	KRY	858	LMK	13,973	MFD	810
KLG	717	KSA	932	LMW	715	MFM	835
KLH	917	KSL	3,731	LND	4,331	MFR	20
KLK	677	KSN	1,002	LNE	261	MGE	662
KLL	216	KSV	30	LNF	357	MGL	601
KLM	2,456	KTA	815	LNH	2,023	MGN	5,190
KLN	7,716	KTH	1,629	LNW	1,144	MGR	12,002
KLO	3,041	KTK	2,051	LNY	575	MHL	1,700
KLR	221	KTM	675	LOD	6,806	MHW	475

MHZ	7,036	MYL	624	OWN	789	RDM	1,733
MIK	1,890	MYN	1,935	OYG	1,436	RDS	303
MIL	761	MYV	812	PAL	16,653	RFN	211
MLA	1,171	NAL	154	PAN	4,420	RFO	1,282
MLD	401	NAN	714	PGN	1,214	RGN	233
MLE	1,650	NAR	564	PGO	375	RHS	425
MLF	1,237	NAS	10,489	PGS	7,369	RIP	52
MLH	1,221	NBE	448	PHB	7,745	RIS	536
MLN	581	NBS	648	PKW	841	RIV	1,284
MLW	7,300	NCE	256	PKY	1,016	RKE	2,035
MMK	2,721	NCM	1,114	PLL	200	RKY	730
MMT	0	NCN	508	PLT	2,423	RLC	3,159
MNB	588	NCV	381	PME	345	RLE	2,130
MNE	478	NEP	205	PMK	5,538	RLH	1,524
MNH	649	NGO	495	PML	4	RME	1,174
MNK	512	NHL	193	PNE	814	RMK	634
MNS	0	NIN	579	PRE	362	RMN	1,046
MNT	6,826	NMK	2,914	PRK	245	RMO	175
MNU	696	NMN	12,031	PRP	16,627	RMS	16,432
MON	214	NMT	1,412	PRS	962	RMT	1,646
MOT	2,463	NNH	6,390	PRT	966	RNG	661
MOY	577	NOF	1,465	PSG	1,183	RNL	575
MPT	3	NOR	673	PSX	602	RNV	241
MRM	2,578	NPT	1,945	PTN	1,525	ROC	13,126
MRN	1,975	NRS	5,454	PTW	1,198	ROK	341
MRO	1,063	NRT	1,896	PUA	1,522	ROM	577
MRW	512	NRY	777	PWC	231	ROT	316
MRY	565	NSM	723	PWL	1,328	RPT	693
MSK	427	NTC	481	PWN	735	RPY	434
MSN	3,335	NTF	580	QKR	15,207	RRN	264
MST	1,641	NTW	824	QPT	867	RRX	275
MTH	1,939	NUT	10,231	QUN	961	RSA	3,537
MTK	480	NWB	171	QVE	632	RSC	807
MTP	248	NWL	5,559	RAN	631	RSK	577
MUC	564	NWN	495	RAY	1,047	RSL	5,874
MUF	1,256	NWT	4,589	RBE	862	RSM	765
MUG	480	OBB	297	RBK	393	RSN	2,566
MUK	370	OGO	271	RBT	130	RSP	355
MUN	806	OGT	1,359	RCH	292	RST	473
MUS	247	OLA	836	RCL	5,207	RSY	666
MVA	1,035	OLD	247	RCM	3,926	RTD	6,932
MVE	525	OLE	1,841	RCN	399	RTH	3,972
MVN	2,612	OLT	1,192	RCR	218	RTN	1,968
MVT	746	OME	3,763	RCS	217	RTO	556
MVW	15,718	OMH	772	RCY	1,478	RUN	344
MWY	70	ORM	302	RDE	914	RUS	7,279

RUY	1,722	SLA	13,210	TLM	7,034	URL	522
RVD	1,311	SLE	1,545	TLN	302	VGA	2,848
RVK	757	SLS	2,661	TLP	951	VIS	703
RVN	1,326	SML	1,463	TLR	403	VMT	605
RVY	1,199	SNB	345	TLT	2,658	VTY	657
RWD	1,063	SND	10,009	TLW	2,366	WAL	10,104
RWH	538	SNH	5,385	TMD	1,509	WAP	147
RWN	399	SNM	916	TME	2,125	WFA	187
RWR	413	SNO	254	TML	512	WFD	1,086
RYN	438	SON	612	TMN	1,007	WGL	1,140
RYX	710	SPL	1,352	TMO	168	WGT	1,453
SAN	13,456	SRD	19,015	TMR	1,320	WHI	14,901
SAP	940	SRL	11,604	TMY	1,408	WIS	338
SBE	1,840	STD	1,296	TNE	690	WKW	1,128
SBH	970	STH	476	TNH	960	WLN	350
SBK	195	STJ	924	TOE	297	WLW	7,003
SBR	408	STM	179	TOG	427	WMN	678
SBY	1,292	STN	10,939	TOO	568	WOL	171
SCF	1,220	STY	585	TOR	291	WPK	284
SCK	1,519	SWD	2,417	TOW	1,059	WRD	13,816
SCL	1,416	TAA	1,658	TPN	339	WST	5,200
SCN	582	TAN	617	TPR	4,217	WTB	1,245
SCT	1,469	TBD	258	TPY	351	WTD	13,623
SFN	1,134	TBL	445	TRE	15,310	WTG	800
SGH	527	TBT	655	TRM	5,060	WVE	1,611
SGN	704	TCN	627	TRR	5,924	WXA	4,362
SGO	6,549	TCY	2,280	TSK	552	WXD	7,041
SHE	824	TDY	561	TST	269	YHL	4,957
SHL	1,309	TEY	536	TSW	157	ADI	
SHN	4,448	TFA	423	TTH	537	ADL	
SHP	4,579	TFN	1,791	TTN	1,929	ADP	
SHR	845	TGN	465	TUM	6,084	ARL	26
SHY	254	TGR	571	TUR	606	EKY	908
SIL	676	THS	5,641	TUX	689	IBM	3
SKB	3,047	THY	982	TVN	561	INY	53
SKL	9,826	TLA	1,458	TWV	12,165	KMC	1,577
SKN	1,516	TLE	1,109	TYC	8,776	PPR	
SKS	5,018	TLH	31,054	UGM	194	SJR	

2. “Could ComReg also advise if it intends for there to be any overlap between the consultation response period for ComReg 20/46 and that for the separate ANM pricing consultation?”

As set out in the Consultation, and as reaffirmed in the 2020/2021 Action Plan, ComReg intends to publish the Separate ANM Pricing Consultation in Q3 2020.

ComReg does not foresee an overlap between the FACO/RFTS consultation period, and the Separate ANM Pricing consultation period.

As further set out at paragraphs 10.231 and 10.232 of the Consultation, ComReg intends that the FACO/RFTS and ANM Pricing Decisions will be adopted in tandem, but has allowed for a transitional period, where this does not transpire.