



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Multi Band Spectrum Award (MBSA2) – Rurtel Transition Plan

Information Notice

Reference: ComReg 23/39

Date: 3/05/2023

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1 Introduction - The RurTel Transition Plan

1. Document 23/39a published alongside this information notice sets out ComReg's final plan for the transition of RurTel¹ services out of the 2.3 GHz and 2.4 GHz Bands by Eircom Limited (trading as Eir, "Eir") (the "RurTel Transition Plan").
2. The RurTel Transition Plan consists of three key elements:
 - "Site Transition", which sets out the decommissioning date for the 16 RurTel sites currently used to provide the RurTel services. As set out in Document 23/39a, a decommissioning date of **Q1 2024** is set for all of 16 sites, although this is a **provisional date for 7 sites** and will be kept under review;
 - "Subscriber Transition", which sets out the migration date for the 21 remaining RurTel subscriber. As set out in Document 23/39a, a migration date of **Q4 2023** is set for all of 21 subscribers, although this is a **provisional date for 5 subscribers** and will also be kept under review; and
 - "Reporting Method", which obliges Eir to provide progress updates to ComReg at defined dates during the year (March, July and November).
3. The RurTel transition plan is also being made available on ComReg's Website in Microsoft Excel format [MBSA2\(23\)013](#) and should there be any updates to the RurTel transition Plan following the above reporting milestones, ComReg will make updates to this excel sheet as required.
4. The RurTel Transition Plan has been formulated:
 - in accordance with the Transition Rules as set out in Section 3.8 of the MBSA2 Information Memorandum (the "IM") (ComReg Document 21/40)²; and
 - following consultation with Eir on a draft RurTel transition plan (see Annex 1 for the non-confidential correspondence and other material related to this consultation).

¹ Means the Point to Multi-Point Radio Link system used to provide fixed telephony services in parts of county Donegal using the frequency ranges 2307 - 2327 MHz and 2401 - 2421 MHz.

² [Document 21/40](#), "Multi Band Spectrum Award - Information Memorandum and Draft Regulations The 700 MHz Duplex, 2.1 GHz, 2.3 GHz and 2.6 GHz Bands", published 16 April 2021, available at www.comreg.ie.

Annex: 1 Non-confidential correspondence related to the RurTel Transition Plan

- A 1.1 The annex sets out the non-confidential correspondence and documents related to ComReg's consultation on the RurTel Transition Plan, including:
- a. ComReg's letter to Eir of 7 February 2023 - notifying Eir of its obligation to formulate and submit a RurTel Transition Plan Proposal;
 - b. Eir's response to ComReg of 7 March 2023 – to which Eir's RurTel Transition Plan Proposal was attached;
 - c. Eir's RurTel Transition Plan Proposal of 7 March 2023;
 - d. ComReg's letter to Eir of 21 March 2023 - to consult with Eir on the Draft RurTel Transition Plan;
 - e. the Draft RurTel Transition Plan of 21 March 2023;
 - f. Eir's submission to ComReg of 28 March 2023 - in relation to the Draft RurTel Transition Plan; and,
 - g. ComReg's letter to Eir of 14 April 2023 - in relation to the Finalised RurTel Transition Plan.

A. ComReg's letter to Eir of 7 February 2023



7 February 2023

Mr William McCoubrey
Head of Regulatory Strategy
Eircom plc
2022 Bianconi Avenue
Citywest Business Campus
Dublin 24,
D24 HX03

BY EMAIL:

[REDACTED], [REDACTED]

RE: MBSA2 Notification of Eir's obligation to formulate and submit a RurTel Transition Plan Proposal

Dear William,

I refer to the Multi Band Spectrum Award ("MBSA2"), the related Information Memorandum (Document 21/40) ("IM"), the Final Assignment Plan for the MBSA2 (ComReg Document 23/06), the MBSA2 Liberalised Use Licence and the MBSA2 2.3 GHz Transition Licence¹ issued to Eir (together "Eir's MBSA2 Licences") which, among other things, license Eir's RurTel network in the 2.3 GHz and 2.4 GHz bands, and to ComReg's letter of 23 December 2022 where ComReg stated that in line with Section 3.8.3 of the IM it would issue a notification to Eir to formulate and submit a Transition Plan Proposal for the transition of RurTel services out of the 2.3 GHz and 2.4 GHz Bands (the 'RurTel Transition Plan Proposal').

Capitalised terms in this letter have the meaning ascribed to them in the IM.

Requirement to formulate and submit a RurTel Transition Plan Proposal by 7 March 2023

In accordance with paragraph 3.286 of the IM, ComReg is now notifying Eir of its obligation to formulate and submit a RurTel Transition Plan Proposal.

A period of 4 weeks is being provided for the submission of the RurTel Transition Plan Proposal, meaning that it must be submitted by 17:00 hours (Irish time) on 7 March 2023.

¹ Noting that Eir's MBSA2 2.3 GHz Transition Licence is only in respect of the 2.4 GHz part of the duplex frequency range (2401 – 2421 MHz) for RurTel, as Eir's MBSA2 assignment from 2300 to 2360 MHz encompasses the 2.3 GHz band part of the duplex frequency range for RurTel (2307 - 2327 MHz).



The RurTel Transition Plan Proposal should be sent via email to Pat McMahon ([REDACTED]) and Joseph Coughlan ([REDACTED]) and titled "MBSA2: RurTel Transition Plan Proposal".

Details to be included in the RurTel Transition Plan Proposal

The RurTel Transition Plan Proposal should identify and consider all the Transition Activities required to transition RurTel Services out of the 2.3 GHz and 2.4 GHz Bands. In that regard, paragraph 3.290 of the IM (extracted below) provides detail of the matters that should be included in the RurTel Transition Plan Proposal.

"3.290 A Transition Plan Proposal should address, to ComReg's satisfaction, at least the following matters:

- *the identification of all Transition Activities to be undertaken by the MBSA2 2.3 GHz Band Transition Licensee and the order in which each activity will be taken;*
- *the setting of milestone dates for each Transition Activity identified;*
- *a robust and transparent mechanism to allow ComReg (including any of its agents or servants), Winning Bidders and other Interested Parties to monitor compliance with the Transition Activity milestones and deliverable dates (subject to non-disclosure of Confidential Information) ; and*
- *the completion of Transition Activities prior to the deadline dates as determined by ComReg in the Transition Plan. Based on current information and noting the rural locations of the existing RurTel customers, this could be informed by the ability of these customers to avail of the services that would be provided via the National Broadband Plan (NBP), the availability of sufficiently comparable voice services provided by Eir on an alternative platform/s and/or by alternative providers."*

To assist Eir in the formulation of its RurTel Transition Plan Proposal, ComReg has attached to this letter an Excel file, which sets out information on the RurTel links licensed in Eir's MBSA2 Licences, the relationship between these links, and the subscribers which are served from these links. This information is also illustrated in schematic form in Annexes 2 and 3 to this letter. ComReg suggests that Eir could use this Excel file as a basis to set out its RurTel Transition Plan Proposal. An explanation of the Excel file is provided in Annex 1 to this letter.

In the submission of a RurTel Transition Plan Proposal, ComReg would expect Eir to identify the Transition Activities and proposed transition/switch-off dates for each of these links and for each of the subscribers, as well as the network as a whole.

Next steps

Following receipt of Eir's RurTel Transition Plan Proposal, ComReg will progress the matter in consultation with Eir with a view to finalising the RurTel Transition Plan. This may take the form of written consultation and/or bilateral meetings with same.



If Eir is unable or unwilling to submit a RurTel Transition Plan Proposal by 7 March 2023, then, and in accordance with paragraphs 3.292 and 3.293 of the IM, ComReg reserves the right to formulate and implement a RurTel Transition Plan, following appropriate consultation with Eir, in order to ensure the migration of RurTel Services to alternative platform(s) in a timely, efficient and orderly manner.

As noted in paragraph 3.293 of the IM, *“ComReg reserves the right to make a final and binding decision on any and all matters pertaining to Transition Rules following appropriate consultation”*.

Yours sincerely,

Pat McMahon
Spectrum Policy and Development
Commission for Communications Regulation



Annex 1

Included with this letter is an Excel file template that ComReg suggests that Eir might use as a basis to set out its RurTel Transition Plan Proposal. The Excel file is named '**RurTel Transition Plan Proposal Template**' and contains two tabs/worksheets:

- 'Site Transition'; and
- 'Subscriber Transition'.

Details under the 'Site Transition' tab

The '**Site Transition**' tab sets out details² of each site (repeaters and hubs) on the RurTel network under the headings:

- Site Name
- Eastings
- Northings
- Site Function (*repeater or hub*)
- Network (*North or South Donegal*)
- 'Dependencies Subscribers' (i.e. whether subscribers are connected to the site as indicated in the 'Subscriber Transition' tab)
- 'Dependencies Downstream Repeater Chain'³ (i.e. which other downstream sites, if any, in the repeater chain rely on connection via the site back to the network hub)

To formulate a RurTel Transition Plan Proposal **please indicate a proposed commissioning date or timeframe for each Site** under the heading 'Transition Milestone – Proposed Decommissioning Date'), noting that this may be dependent on the prior transition of dependent subscribers and dependent downstream repeater sites.

Details under the 'Subscriber Transition' tab

The '**Subscriber Transition**' tab sets out details⁴ of each subscriber on the RurTel network grouped by the site (repeater site/hub) to which the relevant subscribers are connected. This information is based on Eir's previous submissions to ComReg in 2022 and may need updating should further subscribers have migrated from RurTel since then.

Details of the connected subscribers are set out under the following headings:

² As provided by Eir to ComReg in its application of 27 January 2023 for a MBSA2 2.3 GHz Band Transition Licence.

³ The relevant repeater chain details are taken from the Letterkenny/North Donegal and Dungloe/South Donegal network schematics provided by Eir to ComReg in its emails of 14 October 2022 and 15 November 2022 respectively. For reference, copies of the relevant Letterkenny/North Donegal and Dungloe/South Donegal are set out in Annexes 2 and 3 to this letter.

⁴ The relevant subscriber details are taken from the subscriber data provided by Eir to ComReg in its email of 14 October 2022 and from the Letterkenny/North Donegal and Dungloe/South Donegal network schematics provided by Eir to ComReg in its emails of 14 October 2022 and 15 November 2022 respectively. For reference, copies of the relevant Letterkenny/North Donegal and Dungloe/South Donegal network schematics are set out in Annexes 2 and 3 to this letter.



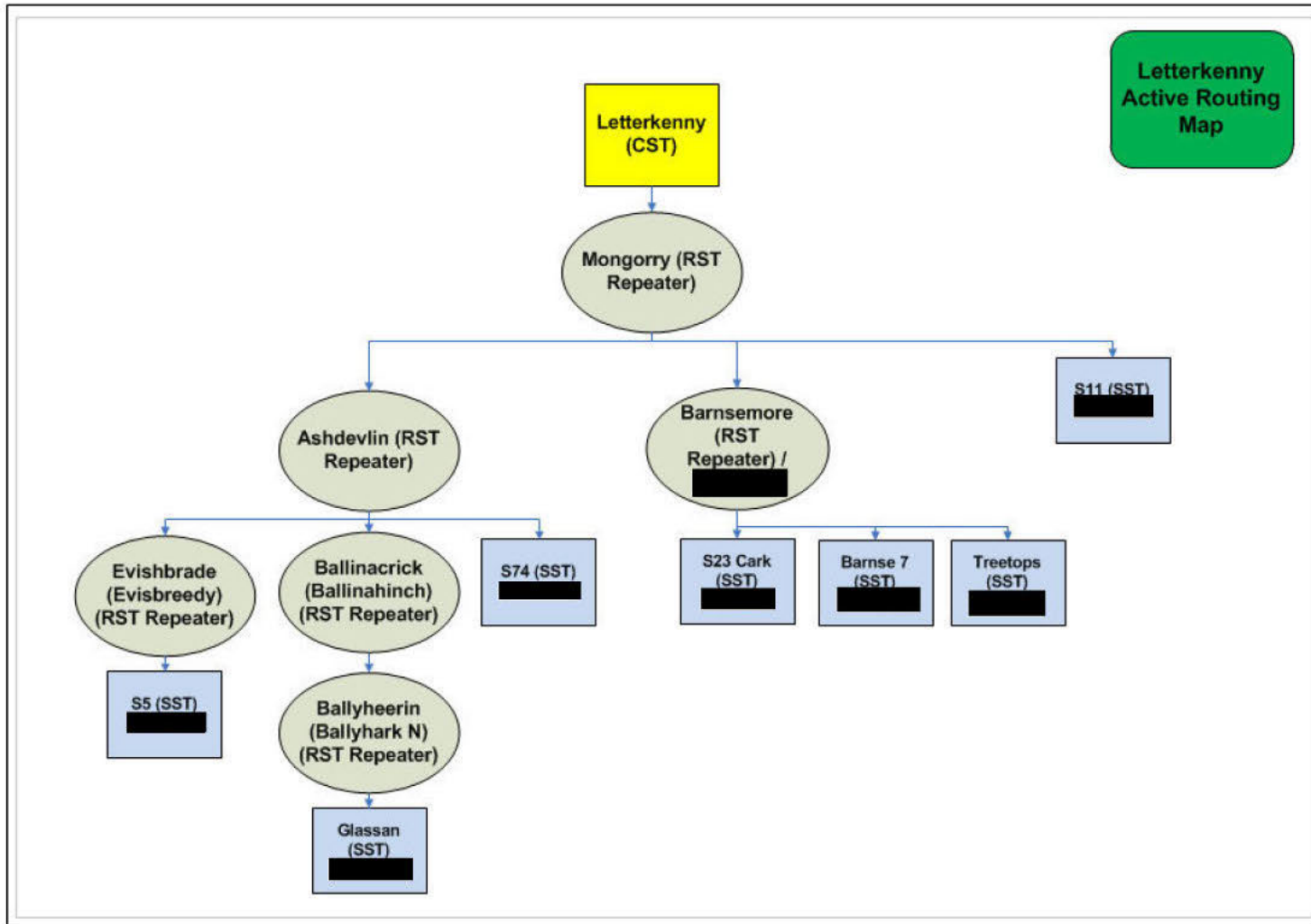
- Site for subscriber connection
- cct_no
- cust_name
- cust_add
- Eircode
- Easting
- Northing
- Substation

To formulate a RurTel Transition Plan Proposal **please provide information on the Transition Options and Milestones for each subscriber** as provided for in the Excel file and as explained in the table below.

Transition Options and Milestones	Requirement
Current transition status	Please indicate if: (i) Eir is actively pursuing a transition strategy for the relevant subscriber and if yes what is it (e.g. potential FCS) or (ii) Eir has yet have to determine a transition strategy for the relevant subscriber and, if so, when it plans to carry out a survey to determine the Transition options.
Availability of Alternative Platform at Customer Premises	Please indicate which alternative platform/s Eir has determined that the relevant subscriber can be migrated to. Examples of alternative platforms include Eir FCS, NBP, Other provider (name to be indicated) etc.
Proposed date for Customer's migration from RurTel	Please indicate the proposed date/timeframe by which the subscriber will have been successfully migrated from the RurTel network.
Other relevant details	Please indicate any additional information that may inform the proposed migration date. E.g. New Eir Mobile site to be deployed at Example Site. The rollout of 700 MHz band at existing sites may bring this customer into mobile service, etc..

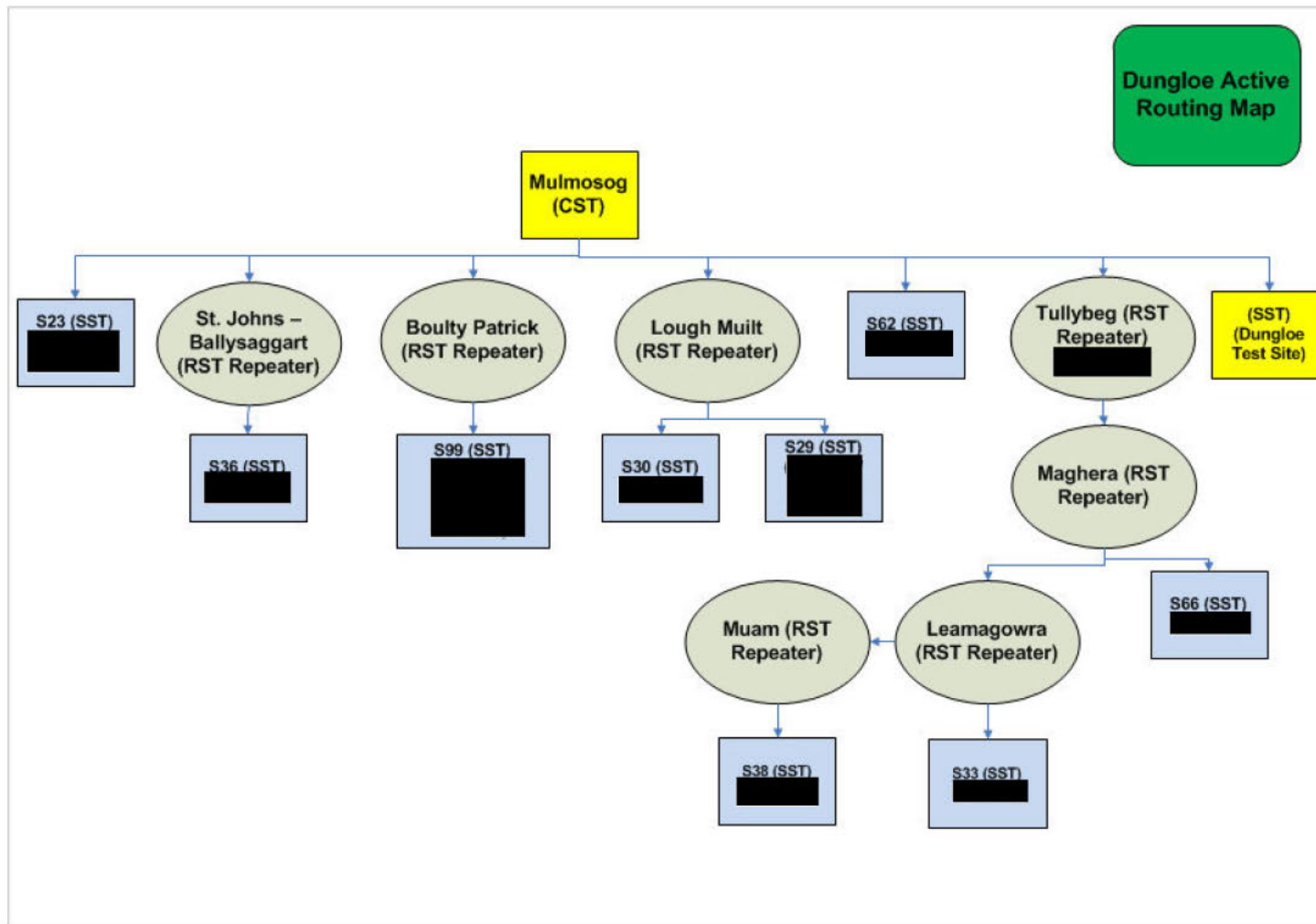


Annex 2 - Letterkenny/North Donegal RurTel Network Schematic





Annex 3 - Dungloe/South Donegal RurTel Network Schematic



B. Eir's response to ComReg of 7 March 2023

Pat McMahon

From: David Humphreys <[REDACTED]>
Sent: 07 March 2023 14:42
To: Pat McMahon; Joseph Coughlan
Cc: XX WILLIAM MCCOUBREY; [REDACTED]; Brendan O'Brien; Patrick Bolton
Subject: Re: [Restricted] MBSA2: Letter notifying Eir to submit a RurTel Transition Plan Proposal
Attachments: RurTel Transition Plan Proposal Template_COMREG eir Response.xlsx

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and believe the content is safe.

Good afternoon Pat and Joseph,

Please find eir's response spreadsheet attached.

eir has for some time been actively planning for this transition. As demonstrated in the attached response, the number of customers in scope has declined significantly, nonetheless it will be important to allow adequate time to complete the transition for the remaining customers.

Kind Regards,

David

[REDACTED]

C. Eir's RurTel Transition Plan Proposal of 7 March 2023

Site Transition

Network Main Sites - Transition Milestones

Site Name	Eastings	Northings	Site Function	Network	Dependencies Subscribers	Dependencies Downstream Repeater Chain	Transition Milestone
							Proposed Decommissioning Date
Letterkenny	217007	411529	Hub	North Donegal	n/a	Mongorry, Ashdevlin, Barnesmore, Evishbride	Q1 2024
Mongorry	223500	404800	Repeater	North Donegal	See 'Subscriber Transition Tab'	Ashdevlin, Barnesmore, Evishbride (aka	Q1 2024
Ashdevlin	239200	426000	Repeater	North Donegal	See 'Subscriber Transition Tab'	Evishbride (aka Evisbreedy), Ballinahinch (aka	Q1 2024
Barnesmore	203700	385300	Repeater	North Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Evishbride (aka Evisbreedy)	243130	434816	Repeater	North Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Ballinahinch (aka Ballinacrick)	222021	446011	Repeater	North Donegal	n/a	Ballyhark N (aka Ballyheerin)	Q1 2024
Ballyhark N (aka Ballyheerin)	217608	441013	Repeater	North Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Mulmosog	174600	387100	Hub	South Donegal	See 'Subscriber Transition Tab'	St Johns (aka Ballysaggart), Boulty Patrick,	Q1 2024
St Johns (aka Ballysaggart)	172899	371511	Repeater	South Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Boulty Patrick	195500	398700	Repeater	South Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Lough muilt	176300	380200	Repeater	South Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Tullybeg	175700	394900	Repeater	South Donegal	See 'Subscriber Transition Tab'	Maghera, Leamagowra, Maum	Q1 2024
Dungloe Test Site	176795	411807	Test Site	South Donegal	n/a	n/a (end of chain)	Q1 2024
Maghera	163719	388930	Repeater	South Donegal	See 'Subscriber Transition Tab'	Leamagowra, Maum	Q1 2024
Leamagowra	167400	386300	Repeater	South Donegal	See 'Subscriber Transition Tab'	Maum	Q1 2024
Maum	166738	388405	Repeater	South Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024

Please indicate a proposed commissioning

Subscriber Transition

Subscriber Dependencies by Site -Transition Milestones

							Transition Options and Milestones				
Site for Subscriber Connection	cct_no	cust_name	cust_add	Eircode	Easting	Northing	Substation	Current transition status	Availability of Alternative Platform at Customer Premises	Proposed date for Customer's migration from RurTel	Other relevant details
Example Site							S11 (Letterkenny)	Please indicate if:	Please indicate which	Please indicate the	Please indicate any additional information that may
Barnemore							Treetops (SST)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Mobile coverage available
Barnemore							S23 Carik (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	
Bouly Patrick							S99 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Repeater solution under investigation
Tullybeg							Tullybeg Repeater	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Mobile coverage available
Bouly Patrick							S99 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Repeater solution under investigation
Bouly Patrick							S99 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Repeater solution under investigation
Bouly Patrick							S99 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Repeater solution under investigation
Muam							S38 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Repeater solution under investigation
Leamagowra							S33 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Repeater solution under investigation
Barnemore							Barnemore Repeater (RST) or	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Mobile coverage available
Lough Muilt							S29 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Repeater solution under investigation
St. Johns – Ballysaggart							S36 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Mobile coverage check in planning
Lough Muilt							S30 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Repeater solution under investigation
Barnemore							Barnse7 (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	
Miongorry							S11 (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Mobile coverage available
Ballyheerin (Ballyhark N)							Glassan SST (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	
Evisbriede (Evisbreeedy)							S5 (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Mobile coverage check in planning
Ashdevlin							S74 (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Mobile coverage check in planning
Mulmosog							S23 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	
Mulmosog							S23 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	
Maghera							S66 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile	Q4 2023	Repeater solution under investigation

D. ComReg's letter to Eir of 21 March 2023



21 March 2023

Mr David Humphreys
Eircom plc
2022 Bianconi Avenue
Citywest Business Campus
Dublin 24,
D24 HX03

BY EMAIL: [REDACTED] Cc: [REDACTED], [REDACTED]

RE: Consultation with Eir on the Draft RurTel Transition Plan¹

Dear David,

I refer to the Commission for Communications Regulation's ("ComReg") letter of 7 February 2023 and Eir's RurTel Transition Plan Proposal dated 7 March 2023 ("Eir's Proposal").

This letter sets (i) ComReg's comments on Eir's Proposal, (ii) ComReg's Draft RurTel Transition Plan which has been formulated largely on the basis of Eir's Proposal, and (iii) the immediate next steps in this process.

ComReg comments on Eir's Proposal

ComReg considers that the proposed Transition activities, milestone dates and identification of dependencies between Transition steps appear reasonable for the circumstances of RurTel Transition, noting in particular that:

- Eir proposes to complete the RurTel Transition within approximately one year;
- there do not appear to be any implications for other authorised operators from Eir using the 2.3 GHz and 2.4 GHz bands for RurTel during this time; and
- the RurTel subscriber locations are located in isolated and sparsely populated areas where access to alternative services may be difficult to obtain.

In order to inform its understanding of Eir's plans for migrating its RurTel subscribers to alternative platforms and to assist in finalising the RurTel Transition Plan, ComReg requests clarification in relation to two elements of Eir's Proposal as follows:

¹ Capitalised terms in this letter have the meaning ascribed to them in the Information Memorandum (Document 21/40) for the MBSA2 Award ("IM") and in ComReg's previous correspondence to Eir on RurTel Transition of 7 February 2023.



1. Please provide a short description of what Eir means in relation to each of the three options it indicated for alternative platforms at subscriber premises. i.e. Option 1 - Mobile, Option 2 - FMS and Option 3 - FCS.
2. Noting that Eir is actively pursuing a Transition strategy for all its RurTel subscribers, please provide additional information on the likely migration solutions under consideration for the five subscribers for whom such information has not been provided.² This information should be inputted into the “other relevant details” column of the ‘Subscriber Transition’ tab in the Draft RurTel Transition Plan (see below).

Finally, ComReg observes that Eir’s Proposal does not contain a reporting mechanism as required under paragraph 3.290 of the IM. To address this, you will note that ComReg’s Draft RurTel Transition Plan proposes a reporting mechanism (as discussed below).

Draft RurTel Transition Plan

ComReg’s draft RurTel Transition Plan is set out in the attached Excel file - identified as document number “MBSA2(23)005”.

Document MBSA2(23)005 contains three worksheets/tabs relating to:

- ‘*Site Transition*’ - the information in this tab, including the proposed decommissioning date for each site, is as proposed by Eir;
- ‘*Subscriber Transition*’ - the information in this tab, including the proposed date for when each subscriber is to be migrated from the RurTel network, is as proposed by Eir. See, however, the requested clarifications above; and
- ‘*Reporting Method*’ - the information in this tab sets out ComReg’s proposal for Eir to submit a progress update to ComReg at defined dates during the RurTel Transition Plan.

Next Steps

Submission of Views

In accordance with the Transition Rules, ComReg is now seeking Eir’s views on the Draft RurTel Transition Plan, which should be submitted by **17:00 hours (Irish time) on 28 March 2023** and sent via e-mail to [REDACTED] and [REDACTED].

² The details for these subscribers are highlighted in the ‘Subscriber Transition’ worksheet of the attached MBSA2(23)005.



Following receipt and consideration of Eir's response, ComReg will finalise the RurTel Transition Plan in line with the IM and publish a non-confidential version of same on its website.

Confidentiality Matters

With regard to the publication of relevant information, ComReg requests that Eir, in any submission it wishes to make, identify any information in relation to the Draft RurTel Transition Plan which it considers to be genuinely confidential. In that connection, ComReg considers that subscriber names and addresses should be considered confidential and will be redacted in any relevant material to be published.

Yours sincerely,

[Redacted signature]

Pat McMahon
Spectrum Policy and Development
Commission for Communications Regulation

E. Draft RurTel Transition Plan of 21 March 2023

Site Transition

Network Main Sites - Transition Milestones

Site Name	Eastings	Northings	Site Function	Network	Dependencies Subscribers	Dependencies Downstream Repeater Chain	Transition Milestone
							Proposed Decommissioning Date
Letterkenny	217007	411529	Hub	North Donegal	n/a	Mongorry, Ashdevlin, Barnesmore, Evishbride	Q1 2024
Mongorry	223500	404800	Repeater	North Donegal	See 'Subscriber Transition Tab'	Ashdevlin, Barnesmore, Evishbride (aka	Q1 2024
Ashdevlin	239200	426000	Repeater	North Donegal	See 'Subscriber Transition Tab'	Evishbride (aka Evisbreedy), Ballinahinch (aka	Q1 2024
Barnesmore	203700	385300	Repeater	North Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Evishbride (aka Evisbreedy)	243130	434816	Repeater	North Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Ballinahinch (aka Ballinacrick)	222021	446011	Repeater	North Donegal	n/a	Ballyhark N (aka Ballyheerin)	Q1 2024
Ballyhark N (aka Ballyheerin)	217608	441013	Repeater	North Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Mulmosog	174600	387100	Hub	South Donegal	See 'Subscriber Transition Tab'	St Johns (aka Ballysaggart), Boulty Patrick,	Q1 2024
St Johns (aka Ballysaggart)	172899	371511	Repeater	South Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Boulty Patrick	195500	398700	Repeater	South Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Lough muilt	176300	380200	Repeater	South Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024
Tullybeg	175700	394900	Repeater	South Donegal	See 'Subscriber Transition Tab'	Maghera, Leamagowra, Maum	Q1 2024
Dungloe Test Site	176795	411807	Test Site	South Donegal	n/a	n/a (end of chain)	Q1 2024
Maghera	163719	388930	Repeater	South Donegal	See 'Subscriber Transition Tab'	Leamagowra, Maum	Q1 2024
Leamagowra	167400	386300	Repeater	South Donegal	See 'Subscriber Transition Tab'	Maum	Q1 2024
Maum	166738	388405	Repeater	South Donegal	See 'Subscriber Transition Tab'	n/a (end of repeater chain)	Q1 2024

Subscriber Transition

Subscriber Dependencies by Site -Transition Milestones

Subscriber Dependencies by Site -Transition Milestones								Transition Options and Milestones			
Site for Subscriber Connection	cct_no	cust_name	cust_add	Eircode	Easting	Northing	Substation	Current transition status	Availability of Alternative Platform at Customer Premises	Proposed date for Customer's migration from Rur/Tel	Other relevant details
Barnemore							Treetops (SST)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Mobile coverage available
Barnemore							S23 Cark (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Please insert information on the transition solution under investigation
Boutly Patrick							S99 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Repeater solution under investigation
Tullybeg							Tullybeg Repeater	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Mobile coverage available
Boutly Patrick							S99 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Repeater solution under investigation
Boutly Patrick							S99 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Repeater solution under investigation
Boutly Patrick							S99 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Repeater solution under investigation
Muam							S38 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Repeater solution under investigation
Leamagowra							S33 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Mobile coverage available
Barnemore							Barnemore Repeater (RST) or	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Repeater solution under investigation
Lough Muilt							S29 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Mobile coverage check in planning
St. Johns – Ballysaggart							S36 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Repeater solution under investigation
Lough Muilt							S30 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Repeater solution under investigation
Barnemore							Barnse7 (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Please insert information on the transition solution under investigation
Mongorry							S11 (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Mobile coverage available
Ballyheerin (Ballyhark N)							Glassan SST (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Please insert information on the transition solution under investigation
Evishbride (Evisbree)							S5 (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Mobile coverage check in planning
Ashdevlin							S74 (Letterkenny)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Mobile coverage check in planning
Mulmosog							S23 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Please insert information on the transition solution under investigation
Mulmosog							S23 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Please insert information on the transition solution under investigation
Maghera							S66 (Dungloe)	Actively pursuing a transition strategy for this customer	Option 1 : Mobile Option 2 : FMS Option 3 : FCS	Q4 2023	Repeater solution under investigation

Please insert short description of what Eir means by "Mobile" service
 Please insert short description of what Eir means by "FMS" service
 Please insert short description of what Eir means by "FCS" service

Reporting Method

(1) Eir will provide progress updates to ComReg in relation to the RurTel Transition Plan in line with the timeframes identified in Table 1 below.

Table 1: Dates for progress updates

2023	End of July, End of November
2024	End of March, or earlier if Transition Activities have been completed earlier
After March 2023 <i>(in the event of delay to completion of the Transition Activities)</i>	End of March, End of July and End of November each year where relevant

(2) The updates should (i) outline progress made and (ii) identify any updates to the RurTel Transition Plan (e.g. for RurTel subscribers migrated, RurTel sites decommissioned, changes in the migration/decommissioning dates, changes in the Transition status of subscribers etc.)

(3) The updates should be provided via email to ComReg. Details of relevant contacts for the reporting in ComReg and Eir are set out in Table 2 below.

(4) ComReg and Eir will notify one another of any changes to the contacts set out in Table 2, as soon as appropriate.

Table 2: Email contact details for progress updates on the RurTel Transition Plan

ComReg	
Eir	

F. Eir's submission to ComReg of 28 March 2023

Consultation with eir on the Draft RurTel Transition Plan

- eir response to ComReg questions of 21 March 2023

- 1. Please provide a short description of what Eir means in relation to each of the three options it indicated for alternative platforms at subscriber premises. i.e. Option 1 - Mobile, Option 2 - FMS and Option 3 - FCS.**

eir response: Mobile is a standard mobile service provided on a mobile device. FMS stands for Fixed Mobile Service which is a fixed broadband service provided over a mobile network carrier. FCS stands for Fixed Cellular Service and is a fixed voice service provided over a mobile network carrier. FCS is the least preferred of the three options as it is also a legacy service close to retirement.

- 2. Noting that Eir is actively pursuing a Transition strategy for all its RurTel subscribers, please provide additional information on the likely migration solutions under consideration for the five subscribers for whom such information has not been provided.² This information should be inputted into the “other relevant details” column of the ‘Subscriber Transition’ tab in the Draft RurTel Transition Plan (see below).**

Eircom response: The three options referenced in question 1 all rely on the availability of adequate mobile network coverage. To date we have been unable to identify economically viable means to provide mobile coverage to the locations of the five subscribers. Regrettably the only option may be to terminate service to those customers in order to the return of the spectrum to ComReg.

Finally, ComReg observes that Eir’s Proposal does not contain a reporting mechanism as required under paragraph 3.290 of the IM. To address this, you will note that ComReg’s Draft RurTel Transition Plan proposes a reporting mechanism.

Eircom response: eir agrees with ComReg’s proposal.

G. ComReg's letter to Eir of 14 April 2023



14 April 2023

Mr William McCoubrey
Eircom plc
2022 Bianconi Avenue
Citywest Business Campus
Dublin 24,
D24 HX03

BY EMAIL: [REDACTED] Cc: [REDACTED], [REDACTED]

RE: Finalised RurTel Transition Plan¹

Dear William,

I refer to Eir's submission to the Commission for Communications Regulation ("ComReg") of 28 March 2023 ("Eir's Submission"), being in response to ComReg's letter of 21 March 2023 seeking Eir's views on the Draft RurTel Transition Plan ("ComReg's Consultation Letter").

Finalisation of the RurTel Transition Plan

From Eir's Submission, ComReg notes that:

- Eir does not comment any further on the proposed Transition activities, milestone dates and identification of dependencies between Transition steps, as set out in the Draft RurTel Transition Plan, except for providing the additional information requested in ComReg's Consultation Letter in relation to:
 - a short description of Eir's three migration options, i.e. Option 1 - Mobile, Option 2 - FMS and Option 3 – FCS; and
 - the likely migration solutions under consideration for the five subscribers for whom such information was not provided in the Draft RurTel Transition Plan; and
- Eir agrees with ComReg's proposal for a reporting mechanism, as set out in the Draft RurTel Transition Plan.

¹ Capitalised terms in this letter have the meaning ascribed to them in the Information Memorandum (Document 21/40) for the MBSA2 Award ("IM") and in ComReg's previous correspondence to Eir on RurTel Transition of 7 February 2023.



In relation to Eir's short description of its three migration options (i.e. Option 1 - Mobile, Option 2 - FMS and Option 3 – FCS), ComReg thanks Eir for its response and is including this text in the finalised RurTel Transition Plan.

Further, ComReg notes Eir's submission that it has not yet been able to identify an economically viable means to provide mobile coverage to the locations of five RurTel subscribers and, further, that the only option to complete RurTel Transition may be to terminate service to them.

In that connection, ComReg observes that while the aim of the RurTel Transition Plan is to transition RurTel Services out of the 2.3 GHz and 2.4 GHz Bands², this Transition should be carried out in an orderly and timely fashion noting, among other things, that the transition principles adopted in the MBSA2 Decision³ include minimising the potential for disruption to existing consumer services.

In ComReg's view, terminating services to these subscribers without providing an alternative service would likely lead to a disruption of existing services. Therefore, Eir's proposed Transition Completion dates for these subscribers, and for the relevant upstream sites in the RurTel network chain on which these subscribers rely for end-to-end service, will be included in the finalised RurTel Transition Plan only as **provisional dates** at this time. These dates will be kept under review as the RurTel Transition Plan progresses.

In accordance with the above, the finalised RurTel Transition Plan being adopted at this time is set out in the attached Excel file – identified as document number "MBSA2(23)006".

The details of this plan will be kept under review as the project progresses, noting that updates to the plan are to be provided at defined dates in accordance with the reporting methodology.

Confidentiality Matters

As noted in the IM, ComReg will publish the RurTel Transition Plan on its website as well as non-confidential versions of relevant correspondence and other material.

ComReg therefore requests that Eir identify any information, originally provided by Eir, in the following correspondence and documents which it considers to be genuinely confidential:

² See paragraph 3.287 of Document 21/40

³ As set out in paragraph 8.34 of Document 20/122 and paragraph 9.52 of Document 19/59R, these transition principles are:

- minimising the potential for disruption to existing consumer services;
- introducing new rights of use in the 2.3 GHz Band as soon as possible not unnecessarily delaying the delivery of future liberalised services;
- maximising benefits to end-users; and
- ensuring the efficient use of spectrum during the Transition period.



1. ComReg's notification to Eir of 7 February 2023 to formulate and submit a RurTel Transition Plan Proposal;
2. Eir's response of 7 March 2023, including Eir's RurTel Transition Plan Proposal;
3. ComReg's Consultation Letter of 21 March 2023 to Eir on the Draft RurTel Transition Plan
4. the Draft RurTel Transition Plan;
5. Eir's Submission⁴;
6. this Letter; and
7. the finalised RurTel Transition Plan.

In that connection, ComReg considers that subscriber names and addresses in the finalised and Draft RurTel Transition Plans should be considered confidential and will be redacted in any relevant material to be published. Eir should email its response by **17:00 hours on Friday 21 April 2023** to [REDACTED] and [REDACTED]. For reference, copies of these documents are attached with this letter in a Zip file.

Yours sincerely,

[REDACTED]

Pat McMahon
Spectrum Policy and Development
Commission for Communications Regulation

⁴ Eir's Submission is marked as confidential in its entirety. Eir should indicate what specific material it considers confidential in that document.