



Commission for  
**Communications Regulation**

## Information Notice

### **Provision of Universal Service by Eircom**

#### **Performance Indicators Q4 2007**

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## Contents

Foreword.....	2
1 About the Universal Service Obligation .....	4
2 Methodology for Quality of Service Performance Indicators.....	6
2.1 DIRECT ACCESS PUBLIC SERVICE TELEPHONE NETWORK (PSTN) PROVISION.....	6
2.2 DIRECT ACCESS PSTN REPAIR .....	6
2.3 FUNCTIONAL INTERNET ACCESS (FIA).....	7
2.4 PUBLIC PAYPHONES .....	7
2.5 AFFORDABILITY OF TARIFFS .....	8
2.6 SPECIFIC MEASURES FOR DISABLED USERS.....	8
3 Appendix.....	9
3.1 DIRECT ACCESS PSTN PROVISION.....	9
3.2 DIRECT ACCESS PSTN REPAIR .....	11
3.3 FUNCTIONAL INTERNET ACCESS .....	13
3.4 PUBLIC PAYPHONES .....	13
3.5 AFFORDABILITY OF TARIFFS .....	14
3.6 SPECIFIC MEASURES FOR DISABLED USERS.....	15

## Foreword

The Commission for Communications Regulation (ComReg) is responsible for the regulation of the electronic communications sector in accordance with national and EU legislation. Among ComReg's functions in this regard is to determine the scope of the Universal Service Obligation ("USO") for the Irish market and decide which undertaking(s) should be designated as the Universal Service Provider(s) ("USP"). In July 2003, Eircom was designated as the Universal Service Provider (USP) for a period of three years. Following a public consultation, in July 2006, Eircom was again designated as the USP for a period to end June 2010.

Regulation 10 of the Universal Service Regulations requires the USP to publish information on its performance in relation to the provision of the Universal Service Obligation (USO). In exercise of ComReg's general powers to publish information under regulation 17 of the Framework Regulations, ComReg has decided to simultaneously publish the performance indicators along with Eircom and the data will continue to be updated on a quarterly basis. ComReg considers that publication provides increased transparency regarding the fulfilment of the USO and will help to inform debate regarding related matters.

Of note throughout Q4 2007 is the improvement in performance for fault repair time. Fastest 80% and 95% completed for both the residential and business segments shows encouraging signs of improvement. However, the rate of fault occurrence in both the residential and business segments only shows minor improvement over the third quarter performance.

A Response to Consultation on USO Quality of Service Performance Targets (ComReg Decision No D02/08, ComReg Document No 08/37) was published today setting legally binding quality of service performance targets for the delivery of installations, the rate of fault occurrence and fault repair timescales. These legally binding targets will be effective for Eircom, as designated universal service provider, from 1 July 2008. ComReg expects that these legally binding targets will act as an

incentive for Eircom to improve its quality of service performance for the benefit of its consumers and stakeholders.

**John Doherty**  
**Chairperson**

## 1 About the Universal Service Obligation

The Universal Service Obligation (USO) is a set of requirements designed to ensure that all persons have access to a minimum set of telephone services.

The services to be provided under the Universal Service Obligation as set out in the USO Regulations<sup>1</sup> are set out in Regulation as the provision of:

- Meeting reasonable requests for connections at a fixed location to the public telephone network and access to publicly available telephone service. The connection is required to be capable of allowing voice calls, fax communications and data communications at data rates which would permit functional internet access
- Directory services – provision of Printed Directories and Directory Inquiry service along with the operation and maintenance of the National Directory Database
- Provision of Public payphones
- Specific measures for disabled users
- Affordability of tariffs for consumers and options to control expenditure

Eircom was designated as the Universal Service Provider (USP) in July 2003 for a 3 year period. Following a public consultation, in July 2006, Eircom was again designated as USP for a period to end June 2010<sup>2</sup>.

Detailed requirements have been set in respect of some aspects of the above. Document 05/64<sup>3</sup> amended an earlier decision requiring the production of telephone directories in CD format.

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<sup>1</sup> European Communities (Electronic Communications Networks and Services) Universal Service and Users' Rights) regulations 2003 – S.I. No. 308 of 2003

<sup>2</sup> The Future Provision of Telephony Services Under Universal Service Obligations

Document 05/70<sup>4</sup> sets out requirements to be followed by the USP when considering the reasonableness of requests for connections and also sets out guidelines to be followed (including performance targets) on providing such connections. The document also provided guidelines in respect of a target data rate for Functional Internet Access.

Document 06/14<sup>5</sup> provided guidance on the criteria to be applied when considering requests for the removal or re-location of public payphones.

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<sup>3</sup> Directory Enquiry Services and Directories - Amendment of requirement to make directories available in CD format

<sup>4</sup> Universal Service Requirements: Provision of Access at a Fixed Location – Connections to Public Telephone Network and Provision of Functional Internet Access

<sup>5</sup> Universal Service Obligations - Removal/Relocation of Public Pay Telephones

## **2 Methodology for Quality of Service Performance Indicators**

Regulation 10(1) of the Regulations requires the USP to publish adequate and up to date information on its performance in respect of the USO. The information is to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive<sup>6</sup>. These, in turn are based on European Telecommunications Standards Institute (ETSI) standards which provide precise detail on definitions and methodologies and have been used in recording the performance indicators. Where the ETSI standards do not cover an aspect of the USO, specific indicators have been developed to ensure that the performance is measured.

In summary the performance indicators address the following aspects of the Universal Service Obligation:

### **2.1 Direct Access Public Service Telephone Network (PSTN) Provision**

This section deals with the USP's record in completing fixed line installations. This section provides information on the percentage of installations which were completed by the date agreed with the customer. Also measured is the time taken for 95% and 99% of all installations. Both of these metrics are as specified in the ETSI standard.

In September 2005, ComReg issued as guidelines, performance targets for installations. The distribution of actual installations against the time periods set out in the performance targets is also shown.

### **2.2 Direct Access PSTN Repair**

This section deals with how many line faults were reported to Eircom and how many were fixed during the reporting period.

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<sup>6</sup> DIRECTIVE 2002/22/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 7 March 2002 on universal service and users' rights relating to electronic communications networks and services (Universal Service Directive)

All faulty lines that are reported in the specified quarterly period are included and reported as a percentage of total installed lines. It should be noted that fault reports which are subsequently found not to be justified (e.g. If a customer reports a fault and it turns out not to be a fault) are excluded i.e. the data reported here represents actual faults.

In terms of reporting on repair rates, the ETSI standard calls for the measurement in working hours for the fastest 80% and 95% of fault repairs which have been completed.

### **2.3 Functional Internet Access (FIA)**

Broadband access does not fall within the scope of the USO with the Directive making clear that the requirement is for a single narrowband connection. In September 2005, ComReg specified a target data rate of 28.8 kbps (kilobits per second) as the minimum data rate which could be considered as capable of delivering functional internet access. Also issued by way of guidance was a performance target of 94% of lines to be capable of the target data speed by June 2006.

This section records the percentage of PSTN lines which are capable of the minimum data rate 28.8 kbps (kilobits per second) or greater. This is calculated by combining the total of working lines taking broadband (by definition, line capability will be above the target rate) and residual lines which are estimated as having a capability greater than 28.8kbps based on sample measurement of data speeds encountered by customers of Eircom's dial-up services.

### **2.4 Public Payphones**

This section provides figures on the numbers of USO payphones provided and the proportion in full working order during the reporting period.



## **2.5 Affordability of Tariffs**

This section provides information on the numbers of bill complaints and records the availability of the Vulnerable Users Scheme and support under the Department of Social and Family Affairs (DSFA) household benefit scheme.

## **2.6 Specific Measures for Disabled Users**

This section records the services and equipment available for people with disabilities.

### 3 Appendix

All data relates to Eircom retail services only as the performance indicators are for the purpose of measuring compliance with the Universal Service Obligation. The data has been supplied by Eircom in accordance with Regulation 10(1) of the USO Regulations.

#### 3.1 Direct Access PSTN Provision

	Q1 2007		Q2 2007		Q3 2007		Q4 2007	
	Res	Bus	Res	Bus	Res	Bus	Res	Bus
Supply time fastest 95% (in working days)	32 working days	36 working days	28 working days	26 working days	24 working days	35 working days	25 working days	30 working days
Supply time fastest 99% (in working days)	129 working days	95 working days	151 working days	103 working days	131 working days	105 working days	131 working days	101 working days
Percentage of requests completed by agreed date	89%	82%	90%	82%	90%	82%	90.2%	82.9%

**Table 1.1 – Provision of Access**

Supply time fastest for both 95% and 99% for the Residential segment remained steady with Quarter 3 2007 performances. However, an improvement is noted for supply time fastest 95% for the Business segment in Quarter 4 2007 over Quarter 3 2007. Again, supply time fastest 99% for the Business segment improved throughout Quarter 4. Requests completed by agreed date improved slightly for both the Residential and the Business segments throughout Q4 2007.

**Fig 1.1 below illustrates the quarterly supply time trend from January 2006 to December 2007 for the provision of Access (in elapsed days)**

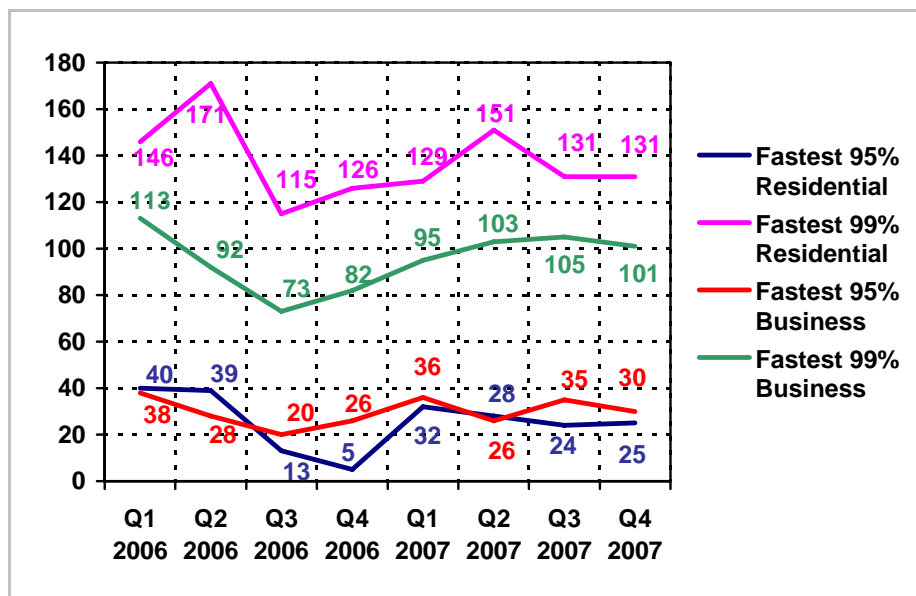


Table 1.2 – Age Profile of Completed Connections

Perf Targets	Q1 2007		Q2 2007		Q3 2007		Q4 2007		
	Res (%)	Bus (%)	Res (%)	Bus (%)	Res (%)	Bus (%)	Res (%)	Bus (%)	
Less than 4 weeks	60% of requests to be met in this time period	94.63	93.25	94.90	95.26	95.47	94.11	95.39	94.77
4 – 8 weeks	80% of requests to be met in this time period	96.91	97.05	96.79	97.87	97.33	97.06	97.15	97.45
8 – 13 weeks	90% of requests to be met in this time period	98.35	98.95	97.96	98.89	98.36	98.76	98.32	98.85
13 – 26 weeks	95% of requests to be met in this time period	99.58	99.68	99.34	99.83	99.45	99.74	99.43	99.57
26 – 52 weeks	All requests to be met in this time period	99.98	100.00	99.87	99.99	99.93	99.99	99.92	99.93

**Table 1.2 – Completed Connections for Q1, Q2, Q3 & Q4 2007**

Table 1.2 shows the age profile of completed connections. Both the Residential and Business segments met the set guideline performance targets throughout Quarter 4 2007. However, a very small percentage of overall connections took more than a year to complete.

### 3.2 Direct Access PSTN Repair

**Table 1.3 – Reported Faults and Fault Repair Time**

	Q1 2007		Q2 2007 <sup>7</sup>		Q3 2007		Q4 2007	
	Res	Bus	Res	Bus	Res	Bus	Res	Bus
Proportion of faults per 100 lines	7.5	3.1	6.1	2.8	6.4	2.8	6.3	2.7
Fastest 80% completed (in working hours)	38.8	33.9	31.7	27.8	32.2	29.6	28.6	24.2
Fastest 95% completed (in working hours)	74.5	71.7	67.1	61.5	67.1	65.3	65.8	59.5

**Table 1.3 – Reported Faults and Fault Repair Time for Q1, Q2 Q3 & Q4 2007**

Table 1.3 shows the reported fault rate per 100 lines for Q1, Q2, Q3, & Q4 2007. Performance for Q4 2007 shows a slight improvement over Q3 2007. Of note, however, is that performance throughout Q4 2007 for fault repair time shows encouraging signs of improvement for both the 80% fastest and the 95% fastest completed in working hours. These performances for Q4 2007 are amongst the best performances reported throughout 2007.

<sup>7</sup> Note: Values for both Residential and Business Fault Rate per 100 Lines have been revised due to incorrect data being submitted by Eircom in advance of Q2 2007 publication by ComReg. Repair time 80% and 95% completed (in working hours) has also been revised due to incorrect data being submitted by Eircom in advance of Q2 2007 publication by ComReg.

Fig 1.2 illustrates the trend for fault rates per 100 lines from January 2006

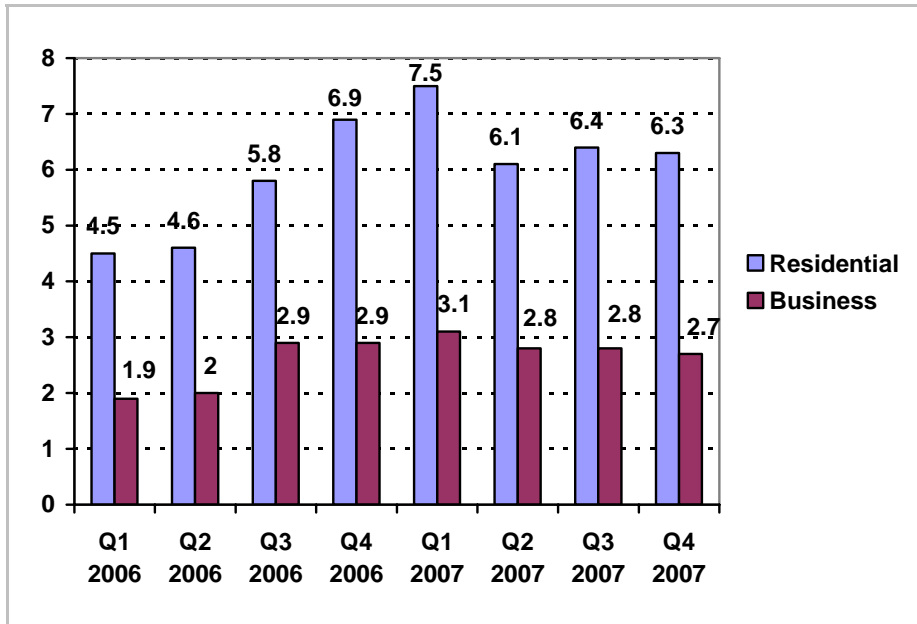


Fig 1.2 – Proportion of faults per 100 lines from January 2006 to December 2007

Figure 1.2 shows that the rate of fault reports increased steadily since the beginning of 2006, with only minor improvements to be seen in Q2 2007, and signs of a deterioration in performance for the residential segment in Q3 2007. Performance throughout Q4 2007 shows only a slight improvement over Q3 2007 performance.

Fig 1.3 illustrates the trend for Fault Repair times from January 2006 in working hours

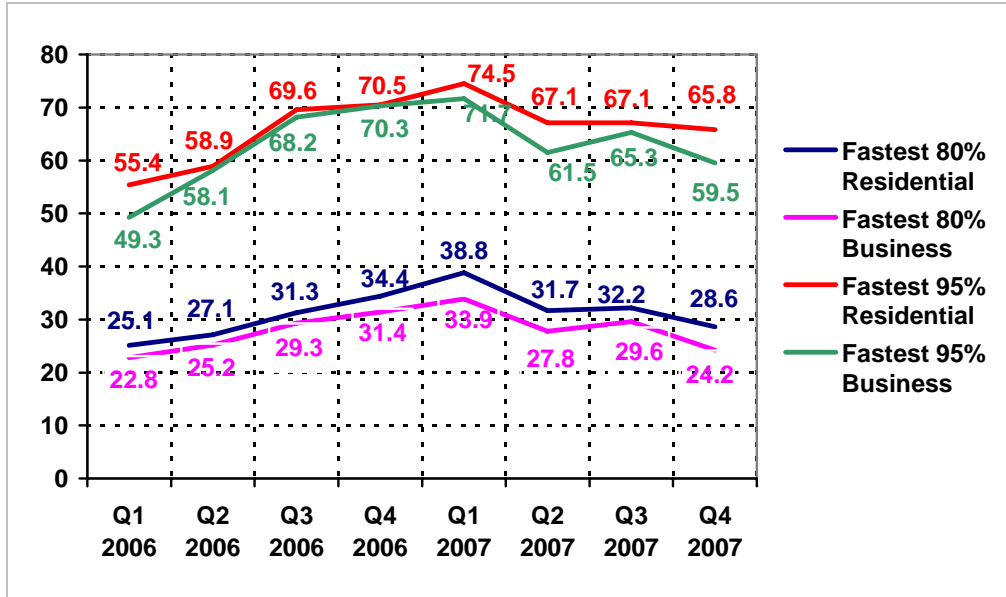


Fig 1.3 – Fault Repair times - Jan 2006 to December 2007

Figure 1.3 highlights the consequential impact of the increase in fault rate per 100 lines by the time taken to repair faults and restore service to customers. It should be noted, however, that performance throughout Q4 2007 shows positive signs of improvement. Nevertheless, while current performance shows encouraging signs, when compared with early 2006 performances; there is still some way to go to match this performance.

### 3.3 Functional Internet Access

	<b>Performance Target</b>	<b>Q1 2007</b>	<b>Q2 2007</b>	<b>Q3 2007</b>	<b>Q4 2007</b>
No of access lines capable of data speed <= 28.8kbps	94%	94.50%	94.44%	94.1%	94.51

**Table 1.4 – FIA for Q1, Q2, Q3 & Q4 2007**

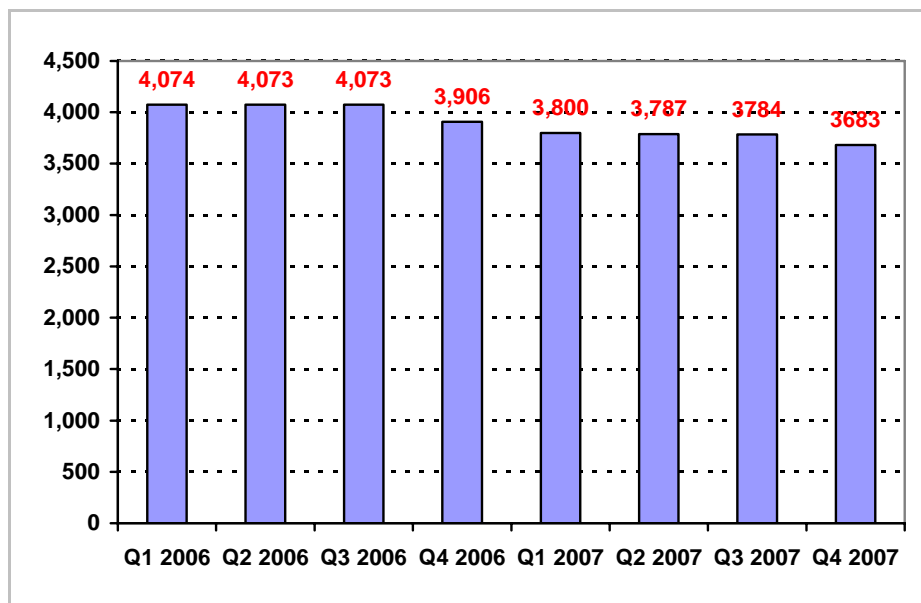
The percentage of lines capable of greater than 28.8kbps target (residential and business) for Q1, Q2, Q3 and Q4 2007 meets the performance target.

### 3.4 Public Payphones

**Table 1.5 shows the number of USO payphones between January and December 2007.**

	<b>Q1 2007</b>	<b>Q2 2007</b>	<b>Q3 2007</b>	<b>Q4 2007</b>
Number of USO payphones for the period	3,800	3,787	3784	3683
USO Payphones in full working order	90.56%	92.51%	89.79%	93.80%

**Fig 1.4 below shows the number of payphones since the beginning of 2006.**



### 3.5 Affordability of Tariffs

<b>Residential consumers who qualify for the DSFA free telephone rental allowance</b>	Under the Department of Social and Family Affairs' Household Benefit Package, qualifying customers can avail of the telephone allowance which is valued at €25.90 per month from 1 August 2007
<b>Residential consumers subscribing to the Vulnerable Users Scheme</b>	Customers can avail of the Vulnerable User Scheme which is targeted at users who need a telephone line but use it infrequently

Table 1.6 – Affordability of Tariffs

	Q1 2007		Q2 2007		Q3 2007		Q4 2007 <sup>8</sup>	
	Res	Bus	Res	Bus	Res	Bus	Res	Bus
Gross number of bill correctness complaints per 100 bills	0.03	0.00	0.02	0.00	0.01	0.00	0.12	0.03

Table 1.7 – Billing Complaints for Q1, Q2, Q3 & Q4 2007

<sup>8</sup> It must be noted that Eircom changed its process for collecting statistics for bill correctness complaints from Q4 2007. Eircom's states that its' approach is now consistent with the ETSI standard in this regard.

### 3.6 Specific Measures for Disabled Users

For customers who are hearing impaired:

- Inductive Couplers
- An Amplified phone
- Visual indicator when phone rings
- The national relay service (Minicom)
- The STEP rebate scheme provides text telephone users with a rebate on text telephone charges

For customers with limited dexterity or mobility:

- Speed dial and automatic redial buttons
- Hands free facility
- Special directory enquiries

For customers with restricted vision:

- Braille billing
- Standardised layout of key pads around central number (5) with raised dot
- Extra large, high contrast buttons.