



Commission for  
**Communications Regulation**

## Irish Communications Market

### **Quarterly Market Commentary**

**December 2003**

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# 1 Foreword

This report updates information on the Irish Communications Sector for the period July to September 2003. In this report we publish the results of our survey of SMEs and their attitude to telecommunications services. We also publish a survey on attitudes to broadcasting services and a review of Internet related activity.

The mobile sector continues to grow this quarter, with the Irish mobile penetration rate reaching 83%. There are now 3.2 million mobile subscribers, while growth in SMS continues with 753 million messages sent during the quarter. Over 40,000 subscribers have ported their mobile number since the introduction of Mobile Number Portability.

Overall revenues for the fixed, mobile and broadcasting sectors have increased, while OAO (Other Authorised Operators) market share stands at 20% for the period. In the quarter Internet minutes continued to exceed those of local and national calls. Internet penetration in terms of SMEs and households is up by 6% and 5% respectively. Internet penetration is now at 90% for SMEs and 44% of all households with a fixed line. SMEs are reporting increased use of broadband where ISDN remains the predominant access technology but connections to DSL have tripled from 3% to 10% over the past year. The number of subscribers to digital television has almost reached 400,000 this period, representing 29% of all households with a television. Approximately one in four of all digital subscribers now subscribe to cable/MMDS.

The main issue on the postal side was the publication of a consultation and response on the application procedures for a postal service authorisation ahead of the application of the new Postal regulations implementing the latest EU Directive on Postal Services. The new regulations provide inter alia, for opening up the international outbound mail services and a formal authorisation system for all postal operators with turnover of €0.5m. The consultation also dealt with the extension of the Postal Levy to OAOs. During the quarter ComReg also held a wide-ranging symposium on postcodes. ComReg intends to issue a report updating the situation on the post codes in the New Year.

Key regulatory developments in respect of telecoms during this quarter include the publication of market analysis consultations on mobile and broadcasting markets as part of the new regulatory framework, a decision notice and response to consultation on ComReg's review of Carrier Pre Selection in Ireland 2003 and the FWALA competition.

I would like to thank all those operators and organisations who have contributed information and comments for this review and I appreciate their efforts in facilitating the publication of this document. I encourage all operators to complete the questionnaire sent to them on a quarterly basis to ensure as complete a picture as possible of the Irish market can be presented.

John Doherty,  
Chairperson  
Commission for Communications Regulation.

## 2 Market Overview

This section of the report provides analysis of the main trends and developments in the various sectors of the Irish communications market and is based on the information contained in the Key Data Report. For more detailed information on the sectors please refer to the Key Data Report. The data covers the quarter July – September 2003, except where otherwise stated.

Total revenues for fixed, mobile and broadcasting increased 3% this quarter. This is mainly attributable to increased revenues in the mobile sector. Since 25 July 2003 the general and basic licence regime has been replaced by General Authorisations under the new EU Regulatory Framework. To date 84 notifications have been received by ComReg, and an Electronic Register of Authorised Undertakings (ERAU) is available on the ComReg website.

### Fixed

The OAO (Other Authorised Operator) market share remains stable at 20%. It has been in the 20-21% range for the last two years.

Over the last year Internet minutes (dial up/ISDN/FRIACO) caught up and now slightly exceed domestic minutes as a proportion of overall fixed retail traffic, reflecting increased internet usage by SMEs and Residential customers. Internet minutes account for 40% of all fixed retail traffic.

ISDN uptake remained static since last quarter. DSL take-up has increased rapidly over the last quarter to 13,350 up from 7,350 and orders now running at over 1,000 per week. FRIACO – wholesale flat rate services - were launched at the end of June. There are now approximately 30,000 FRIACO subscribers with new orders currently running at over 1,500 per week.

### Mobile

The mobile penetration rate now stands at 83%, an increase of 2% since our last review. Meteor now accounts for 5% of this market with Vodafone and 02 having 56% and 39% respectively. SMS continues to grow, with each mobile subscriber sending on average 78 messages each month. This is an increase from 75 per month in the last quarter and an increase from 65 messages per month for the same period last year.

The fourth mobile network operator “3” launched its services on the 30<sup>th</sup> September 2003. 3 won the competition for the 3G “A” licence and has an obligation to provide MVNO access to its network.

### Internet

The results of the Amárach residential Internet research show that 44% of adults have Internet access at home<sup>1</sup>, a 5% increase on the previous quarter. PC ownership at home has also increased with 49% now having home PC. PSTN remains the predominant access technology for residential users followed by ISDN. ComReg is pleased to note that the CSO has introduced a household Internet survey and has worked closely with them.

### Cable/MMDS & Satellite

At 391,000, total digital subscribers in Ireland represent 29% of all households with a television, up from 23% in 2002. This figure has increased by 83,000 since December 2002. Increases in both cable/MMDS and satellite digital subscribers have contributed equally to this annual growth. Total cable/MMDS revenues have fallen by 2% since last

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<sup>1</sup> Adults ages 15 – 74 with a fixed line phone.

quarter. It is likely that this fall is largely due to a fall in subscribers brought about by a stricter bill payment regime introduced by one of the larger operators.

**Tariffs**

Ireland's position fell by one place in both of the national PSTN baskets, remained unchanged in the international business PSTN basket and improved by one place to 5<sup>th</sup> in the international residential PSTN basket. The leased lines baskets have remained unchanged while the only movement in the mobile baskets was a fall of one position to 4<sup>th</sup> in the pre paid basket. Ireland has fallen by one position in both of the basic rate ISDN baskets but remains unchanged in the primary rate ISDN business basket. There has been no change in the ADSL baskets since last quarter.

### 3 SME Survey

During the quarter ComReg commissioned MRBI to examine the attitudes of Irish SMEs to telecommunications services in the Irish market. Interviews with 305 SMEs were conducted in October/ November 2003.

#### 3.1 Summary

The results of the survey suggest that SMEs are more aware of the choices available to them in the fixed line market and that both *eircom* and OAOs are actively approaching them in an attempt to win over some or all of their fixed line business. Price is by far the main incentive for SMEs who have switched their fixed line supplier over the past twelve months. SMEs are more likely to switch their fixed line supplier than their mobile supplier (23% as opposed to 10%), perhaps due to the more limited options available. *eircom*'s share of the local, national and international SME call markets has fallen slightly since 2002.

Over four in five SMEs believe that the telecoms' market is more competitive than twelve months ago although seven in ten continue to indicate that their telecoms' costs have increased or remained the same in the last year<sup>2</sup>. This is supported by the fact that 64% of SMEs believe that there are savings to be gained by changing their telecommunications supplier compared to 47% in 2001. In terms of investment, approximately the same proportion of SMEs as last year (37%) indicated that they intend to invest more in telecoms in the future.

The number of SMEs who have ISDN lines (62%) has continued to grow substantially, up from 51% since 2002. At 46% ISDN remains the main technology for SMEs accessing the Internet. With this growth of ISDN, there has as expected also been an increase in demand for DSL services up some 7% since 2002. The results of our survey show that over 50% of SMEs in areas where DSL is available, have indicated that they are likely to subscribe to DSL at some stage in the future.

Of the respondents who installed their leased lines in the last 12 months 55% had a SLA with their supplier, up from 14% in 2002.

The majority of SMEs have a contract with a mobile operator for their mobile services and use their mobile phones abroad for work purposes. SMS is still not widely encouraged as a means of reducing the cost of international roaming (12%).

Detailed results of the survey are as outlined below.

#### 3.2 General Attitudes to Telecommunications

In measuring overall reaction to the telecommunications market, companies were asked to what extent they agreed or disagreed with a series of statements related to the market. Table 3.1 illustrates the percentage of SMEs who agreed with the statements.

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<sup>2</sup> Perhaps due to increased use of telecoms services.

**Table 3.1 SME attitudes to the telecommunications market**

<i>Question</i>	<i>2003</i>	<i>2002</i>	<i>2001</i>
<i>I believe that there are savings to be gained by changing my telecommunications supplier</i>	64%	58%	47%
<i>When choosing a telecommunications supplier, I place more importance on the quality of service than the price</i>	67%	64%	72%
<i>I believe that the telecommunications market is more competitive than it was twelve months ago</i>	84%	85%	84%

### 3.3 Investment in Telecommunications

Although the majority of SMEs believe that the telecoms market is more competitive than twelve months ago, 44% indicate that their telecoms costs have increased in the last twelve months. This may be due to increased use of telecoms services. In relation to investment 37% of SMEs intend to invest more in telecoms in the next twelve months. Table 3.2 illustrates the services / devices that SMEs are most likely to invest in.

**Table 3.2 Services / Devices SMEs intend investing in**

<i>Services / Devices</i>	<i>2003</i>
<i>Internet / Web Development</i>	62%
<i>More Computers / hardware</i>	61%
<i>New phone system / upgrading existing system</i>	37%
<i>Mobile Telephony</i>	34%

### 3.4 Use of Telecommunications Devices or Services

Nearly all of the SMEs surveyed have a PSTN line while over three in five (62%) have an ISDN line, compared to 51% in 2002. The majority of SMEs continue to have at least one mobile phone (84%).

SMEs rely more on leased lines with 18% currently using at least one leased line compared to 15% in 2002. Over two in five SMEs installed their leased lines in the last 12 months. Although the survey suggests that a proportion of SMEs experienced difficulty with the delivery of their leased lines, the average delivery time of leased lines from *eircom* to OAOs has improved in the last year falling from 20 days in October 2002 to 18 days today.

Over half of SMEs who installed their leased lines in the last twelve months were aware that they could get a SLA with their leased line supplier, while 55% actually had a SLA (up from 14% in 2002).

### 3.5 Telecommunications Suppliers

*eircom* remains the main supplier for SMEs in the fixed line market while Esat BT and MCI are the largest OAOs. *eircom*'s share of the local, national, and international call markets has fallen slightly since the last SME survey in 2002 to approximately 76%, while Vodafone and O<sub>2</sub> remain the leading suppliers of mobile phones to SMEs.

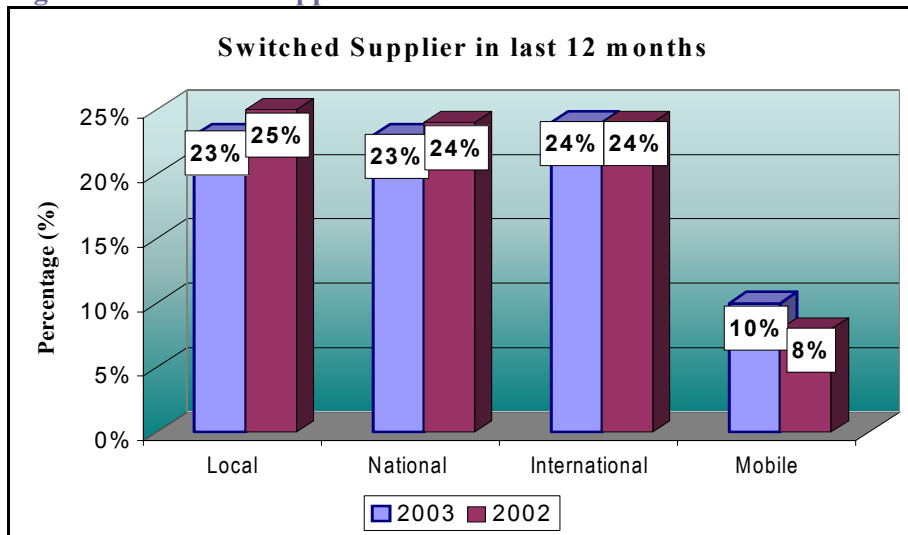


### 3.6 The Competitive Environment

The survey results indicate that as was the case in 2002, approximately one in four businesses switched their fixed line supplier in the past 12 months. Businesses placed far more emphasis on price and cost when giving reasons for switching, than in 2002 when dissatisfaction with service was also given as a main reason. This may perhaps be an indication that SMEs have become more price sensitive over time or that service levels have improved or both.

Figure 3.1 illustrates that SMEs are more likely to switch their fixed line supplier than their mobile supplier, perhaps due to the more limited mobile options available to them. One in ten switched their mobile supplier in the last twelve months, while on average one in four switched their fixed line supplier. Those who didn't switch their fixed or mobile supplier were largely satisfied with their current service levels. The more widespread use of mobile number portability may have an impact on this in the future.

Figure 3.1 Switched Supplier in the last 12 months



### 3.7 Carrier Pre Selection (CPS)

According to the survey almost four in five companies are aware of CPS and as can be seen in table 3.3 below, nearly one in four currently use the service.

Table 3.3 Use of CPS

Awareness and Use of Carrier Pre Selection	2003	2002
Currently using the service	23%	20%
Used it in the past but not now	12%	14%
Considering using the service	6%	7%
Considered using the service but will not be using it	16%	14%
Have not considered the service	42%	41%

There seems to be significant activity amongst operators in this market with almost seven in ten SMEs approached by an OAO regarding switching some or all of their fixed line business. 23% of SMEs are currently using CPS compared to 20% in 2002.

It can be seen from Table 3.3 above that 12% of all SMEs used CPS in the past but not anymore. One third of those that discontinued with the service gave the reason that they were approached by *eircom* with what was perceived to be a better deal.

44% switched part of their fixed line business from *eircom* at some stage, while half have switched back. Those who switched back were largely prompted to do so following an approach by a sales person from *eircom* (56%).

### 3.8 Mobile Phone Services

One in five SMEs have experienced difficulty with the quality of service from their mobile operator, with poor coverage cited as the biggest difficulty. Most SMEs have a contract with their mobile operator (79%) while only 4% use pre-paid mobile phones.

Three quarters of SMEs use their mobile phones abroad for work purposes although 44% are not satisfied in relation to the cost of using their mobile abroad. Only 58% of all respondents are aware of the cost associated with calling another network, while SMS is not actively encouraged as an alternative form of mobile business communication (12%).

### 3.9 Internet

Internet use is widespread among SMEs with 90% connected, compared with 84% in 2002. As illustrated in Table 3.4 ISDN remains the most widely used access technology amongst SMEs. In relation to DSL, connections among SMEs have increased from 3% to 10% since 2002, while over 50% of SMEs located in areas where DSL is available have indicated that they are likely to subscribe at some stage in the future.

**Table 3.4 Access technology used to connect to the Internet**

<i>Access technologies</i>	2003	2002
<i>ISDN</i>	46%	45%
<i>PSTN</i>	39%	44%
<i>Leased Line</i>	8%	6%
<i>DSL</i>	10%	3%

Table 3.5 below illustrates the key Internet application used by SMEs. E-mail continues to be the most widely used application with SMEs still not yet fully engaging in higher bandwidth applications.

**Table 3.5 E-business applications used by SMEs**

<i>E-business applications</i>	2003
<i>E-mail with suppliers / customers</i>	87%
<i>Booking travel / accommodation</i>	53%
<i>Sourcing information</i>	61%
<i>On-line banking</i>	60%

28% of SMEs now pay a set fee for always on access, up from 21% in 2002. In terms of bandwidth connection, one in four have upgraded in the past 12 months compared to one in ten for 2002, whilst one in three plan to increase their bandwidth over the next 12 months.

SMEs appear to be increasingly interested in engaging in e-commerce with well over half likely to buy something on the Internet in the next 12 months, while almost a third are planning to sell something on the Internet.

## 4 Consumer survey on Take-up of Television Services

ComReg commissioned MRBI to conduct a survey on the take up of television services<sup>3</sup>. Between July and August of this year, 1122 interviews were carried out with the head of household. Quotas<sup>4</sup> were applied on region, social class and on known take-up of Pay TV/non Pay TV as of end of March 2003<sup>5</sup>. The main objective of the survey was to identify the type of service accessed by households and the basis for doing so, in addition to understanding the barriers if any to subscribing to Pay TV.

### 4.1 Summary

The principal findings from the consumer survey are as follows: two thirds of all households subscribe to Pay TV via cable, MMDS or satellite. A minority, (3%) have two Pay TV providers. Subscribers to Pay TV have the highest representation in Dublin (39% of respondents).

Only 6% of Pay TV subscribers had switched service provider in the past two years, of which the majority had switched to satellite. Close to half (49%) of those subscribers that had not considered switching in the last two years stated that they were happy with their current service.

The survey found that more than one third of Pay TV households subscribe to digital television with close to half (45%) having signed up to digital services more than two years ago.

### 4.2 Profile of TV Households

Subscriber households tend to be larger in number (62% of households have more than three members) and are more likely to have children. On average, respondents spent 2.5 hours per day watching television, those between the ages of 15-24 reported to watch the most television, viewing on average 3.2 hours per day.

Of the two thirds of all TV households which subscribe to Pay TV services, just over half (53%) receive service via cable, a third (35%) via satellite and the remainder (13%) via MMDS. Three percent of subscribers receive Pay TV services from two operators. Sixteen percent of BSkyB subscribers report that they joined their provider in the past year (as opposed to 4% for ntl and 6% for Chorus). Approximately 75% of cable/MMDS subscribers have been with their provider for more than four years.

Of those that do not subscribe to Pay TV services, 14% reported to have done so at some time in the past. Of those households that had never subscribed to Pay TV, the main reason given (41%) for not doing so was satisfaction with their current range of channels.

Less than one in four stated that they were likely to subscribe to cable/MMDS or satellite at some stage in the future. Non subscribers between the ages of 25-34 years and heavy viewers are more likely to subscribe to Pay TV in the future. For those who previously subscribed to Pay TV, but no longer do so (only 53 respondents), no interest was given as the main reason for terminating their subscription.

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<sup>3</sup> For the purposes of this survey we have not classified deflector services as Pay TV.

<sup>4</sup> Margin of error +/- 3.5%.

<sup>5</sup> Quotas for take up of Pay TV/non Pay TV were based on ComReg Quarterly Report (03/67), BSkyB Annual Report 2003 and ntl Q2 Quarterly Report 2003

As can be seen in Table 4.1, subscribers to Pay TV services have a higher representation in Dublin.

**Table 4.1 Geographic breakdown of Pay TV usage**

<i>Region</i>	<i>Population quota applied per region (based on CSO data)</i>	<i>Number of non subscribers per region as a % of all non subscribers</i>	<i>Number of subscribers per region as a % of all subscribers</i>
<i>Dublin</i>	32%	19%	39%
<i>Rest of Leinster</i>	25%	21%	26%
<i>Munster</i>	26%	34%	23%
<i>Connaught/Ulster</i>	17%	26%	12%

### 4.3 Switching Behaviour

Of the Pay TV subscribers that had switched service provider in the past two years (6%), the key reasons given for switching were the wider range of channels offered or improved customer services by the new provider.

Of those who had not switched service provider in the last two years, more than four in five (83%) subscribers had not considered doing so, mainly because they were happy with their current service (49%), whilst one in ten cited the lack of an alternative supplier. Of those who considered switching service provider, but had not done so, the main reason given were that there was no other service provider available (16%), they had no time (13%) or after consideration they were happier remaining with their existing provider (13%).

### 4.4 Digital TV

Nearly four in ten Pay TV households (39%) subscribe to digital TV services with close to half (45%) of those subscribers having signed up over two years ago. Approximately eight in ten digital subscribers said they subscribed to satellite. Content was a key driver for switching to digital, a wider range of channels (27%), football/sports channels (21%) and the good deal/special offer received (10%) being the main reasons. Barriers to upgrading to digital include a lack of interest (18%) and being content with current service (15%).

## 5 Regulatory Developments

The following publications and developments relate to the period 9th September 2003 to 3rd December 2003:

### 5.1 EU Framework

ComReg has started a range of consultations on the levels of competition in key electronic communications markets. Under national regulations which transpose EU Directives, ComReg is obliged to define relevant markets appropriate to national circumstances, in particular relevant geographic markets within the State, in accordance with the market definition procedure outlined in the Framework Regulations.<sup>6</sup>

In addition, ComReg is required to conduct an analysis of the relevant markets to decide whether or not they are effectively competitive.<sup>7</sup> Where it concludes that the relevant market is not effectively competitive (i.e., where there are one or more undertakings with significant market power (“SMP”)), the Framework Regulations provide that it must identify the undertakings with SMP on that market and impose on such undertakings such specific regulatory obligations as it considers appropriate.<sup>8</sup> Alternatively, where it concludes that the relevant market is effectively competitive, the Framework Regulations oblige ComReg not to impose any new regulatory obligations on any undertaking in that relevant market, and withdraw any such obligations it may have imposed at an earlier stage.<sup>9</sup>

#### 5.1.1 Market Analysis - Wholesale Broadcasting Transmission Market

Along with the two mobile consultations mentioned below, on 22 October 2003 ComReg launched a national consultation<sup>10</sup> on its review of the Wholesale Broadcasting Transmission Market included in the Commission’s Recommendation on Relevant Markets. ComReg’s preliminary conclusions indicate that, in Ireland’s case it is appropriate to split this proposed market definition into two distinct transmission markets appropriate for ex ante regulation and that RTE Networks are dominant in the transmission of analogue terrestrial TV and analogue terrestrial radio. Subject to consultation, ComReg is proposing to place formal obligations on RTE Networks to operate in a transparent and non-discriminatory fashion in these markets. The deadline for submission of responses for the broadcasting and mobile consultations is 3 December 2003.

#### 5.1.2 Market Analysis - Wholesale voice call termination on individual mobile networks

In terms of mobile voice call termination, ComReg has found that all four mobile networks have dominance in the termination of voice calls on their network<sup>11</sup>. ComReg is consulting on a variety of obligations including cost orientation, transparency and non-discrimination.

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<sup>6</sup> Regulation 26.

<sup>7</sup> Regulation 27.

<sup>8</sup> Regulation 27(4).

<sup>9</sup> Regulation 27(3).

<sup>10</sup> ComReg Document No 03/126 – Consultation on Market Analysis of Wholesale Broadcasting Transmission Services

<sup>11</sup> ComReg Document No. 03/127a Market Analysis - Wholesale voice call termination on individual mobile networks

### **5.1.3 Market Analysis - The wholesale national market for international roaming on public mobile networks**

ComReg is also consulting on the wholesale national market for international roaming and concludes that it is dependent on data from other European regulators to complete this analysis<sup>12</sup>. This market relates to the rates charged by Irish operators to other operators whose customers are roaming in Ireland. ComReg is proposing to coordinate with other European regulators to expedite this market review.

## **5.2 Fixed**

### **5.2.1 Payphone access charge – Industry implementation, Response to Consultation & Decision Notice**

In recent years, the growth of free-phone traffic in the Irish market has raised the issue of payphone operators being in a position to recover the cost of the use of their public payphones when calls are made to free-phone numbers. The implementation of the Payphone Access Charge (PAC) facilitates the recovery of these costs.

ComReg issued a public consultation<sup>13</sup> on some of the details of the implementation of the charge, in particular, deciding which payphones are PAC eligible, charging transparency issues and other matters. As a result of this consultation three decisions were made regarding the eligibility of payphones for PAC, requirements for levying the PAC and a process for dealing with inappropriate use of the PAC facility.

The decisions made in this paper<sup>14</sup> and the subsequent actions required have been incorporated within the current project plan for implementation of the PAC by the PAC Forum.

### **5.2.2 Summary of Investigation into FRIACO constraints**

In January 2003 ComReg issued Decision Notice D1/03<sup>15</sup> which mandated the introduction of Flat Rate Internet Access Call Origination (FRIACO). The decision notice set out a detailed timescale to enable the provision of a retail offering by 27 June 2003. In March 2003 *eircom* submitted a document to ComReg and EsatBT, giving an overview of EsatBT interconnection orders along with associated *eircom* constraints.

As ComReg was unable to confirm to its satisfaction, the justification of these constraints, ComReg conducted an investigation. Both parties were afforded the opportunity to provide formal submissions which were considered by the Case Officer in arriving at this determination. The case officer maintained that *eircom* failed to substantiate the legitimacy of their constraints and set out a number of directions. One of these directions requires *eircom* to agree a program with Esat BT, by 31 October 2003, for the migration of Esat BT's FRIACO paths provided by CSI to FRIACO paths provided on ISI/ISH should Esat BT wish to migrate any of these paths. The remainder of the directions are outlined in the final determination of the case<sup>16</sup>.

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<sup>12</sup> ComReg Document No. 03/128 Market Analysis - The wholesale national market for international roaming on public mobile networks

<sup>13</sup> ComReg Document No. 03/73 – Payphone Access Charge Industry Implementation

<sup>14</sup> ComReg Document No. 03/111 – Response to Consultation & Decision Notice D19/03 Payphone Access Charge, Industry Implementation

<sup>15</sup> ComReg Document No. 03/02 – Implementation of Flat Rate Internet Access Call Origination (FRIACO)

<sup>16</sup> ComReg Document No. 03/114 – Final Determination No. 02/03 Summary of Investigation into FRIACO Constraints

### **5.2.3 Guidelines for the inclusion of a minimum set of requirements in contracts with end users**

Condition 18 of a General Authorisation requires relevant service providers to comply with all decisions, determinations, requirements, specifications, notifications and directions issued by the Commission in relation to End-User interests and rights pursuant to the Universal Service Regulations. Regulation 17 of the Universal Service Regulations requires the inclusion of a minimum level of information in end-user contracts. Contracts are required to specify the contractual terms, conditions, quality of service, condition for termination of the contract and service, compensation measures and dispute resolution procedures.

To aid providers in complying with their obligations ComReg has issued contract guidelines<sup>17</sup> as part of the process for implementing the end user protection measures as outlined in Decision Notice D16/03. Whilst the regulations set out a framework of compulsory information to be included by undertakings within a contract, the guidelines provide clarification on the minimum level of information to be contained under the necessary headings.

The guidelines are intended to assist both operators and end users by improving the quality of information being made available. The provision of clear and unambiguous contract terms will allow subscribers to directly enforce their contractual rights with their service provider and therefore provide a significant transparency safeguard.

ComReg will begin the process of monitoring compliance with Regulation 17 on 23 February 2004 after the four month period for compliance has elapsed.

### **5.2.4 ComReg's Review of Carrier Pre Selection in Ireland 2003 – Decision Notice & Response to Consultation**

Carrier Pre Selection is a key barometer of competition in the fixed market. This service enables consumers to use the operator of their choice to carry their calls, thus allowing them to select the service provider offering the best value in terms of price and quality according to their needs.

In April 2003<sup>18</sup> ComReg launched a review of CPS amid growing concern that CPS growth was faltering, with low penetration levels and high levels of churn when compared with other EU countries. Since this review<sup>19</sup> a number of measures have been adopted to ensure that competition in the CPS market can be sustained and grow. In the review ComReg also proposed a new set of initiatives which will enhance the CPS product for the benefit of consumers. The new developments will include improved price transparency and awareness for consumers and more stringent enforcement measures to ensure compliance with the Code of Practice. ComReg will continue to work with industry to implement these new initiatives and to monitor developments in the CPS market.

### **5.2.5 Reference Interconnect Offer (RIO)**

Under current Irish and EU legislation, an operator who is designated as having significant market power (SMP) is subject to a number of obligations, including the requirement to

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<sup>17</sup> ComReg Document No. 03/129 – Guidelines for the inclusion of a minimum set of requirements in contracts with end users

<sup>18</sup> ComReg Document No.03/76 – Consultation Paper, Carrier Pre-Selection in Ireland 2003, ComReg's 2003 Review

<sup>19</sup> ComReg Document No. 03/115 – Response to Consultation and Decision Notice, ComReg's review of Carrier Pre Selection in Ireland 2003



permit other authorised operators (OAOs) to interconnect with its network. To facilitate this process, the SMP operator must publish a reference interconnect offer (RIO) that sets out the terms and conditions for interconnection and the prices to be charged.

In a submission to ComReg in July 2003 *eircom* proposed revised interim interconnection conveyance rates for the period 1 April 2003 to 31 March 2004. The revised rates mean that *eircom*'s wholesale customers will pay less for interconnection. ComReg indicated to *eircom* that these proposed rates should be published in its RIO without amendment<sup>20</sup>.

In September 2003 *eircom* posted a proposed text change to their RIO from Version 3.2 to Version 3.3 on its website. ComReg confirmed that the adjustments shown in *eircom*'s proposed RIO Version 3.3 are compliant with their obligations under the relevant laws.<sup>21</sup> Following a review by ComReg of Order Handling Charges for Carrier Pre Selection (CPS), Wholesale Line Rental (WLR), Payphone Access Charges (PAC) and Date Management Amendment, *eircom* were directed to make a number of amendments to their submissions on these services and update the RIO with the revised charges<sup>22</sup>. These amendments have now been made and the setting of rates for these services will provide greater flexibility and commercial certainty to operators in the market.

### **5.2.6 Consultation Paper on the application of retention rates in the Number Translation Code market.**

This consultation paper seeks the views in relation to the current regime for the charging for calls to Number Translation Codes<sup>23</sup>. ComReg regulates the charges *eircom* raises for the work it undertakes in carrying calls which are terminated on OAO hosted NTCs. ComReg proposes that a change be introduced to the relevant interconnect charges if it is determined that a change to the existing levels of charge is appropriate.

### **5.2.7 Partial Private Circuits: Update on Pricing and Migration**

The Partial Private Circuits product (PPC) is an interconnect product that allows Other Authorised Operators (OAOs) to provide point to point data services by availing of *eircom*'s network, including its local access network. ComReg and *eircom* have agreed to the reinstatement of In Span Interconnect (ISI), a product for operators to avail of efficient and cost effective connections between networks for voice services<sup>24</sup>. This product was originally removed as it was considered technically the same as the In-Span Hand-over (ISH) transmission PPC product, but it has since been decided to reinstate the ISI product due to the difference in pricing characteristics between the two.

### **5.2.8 'In-Situ' Transfer of Leased Lines:**

Developing a process that would allow for leased lines to be transferred on an in-situ basis would be of significant benefit to businesses by allowing them to avail of the benefits of competition whilst eliminating any disruption or unnecessary expense that they would otherwise experience through switching their supplier of leased lines.

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<sup>20</sup> ComReg Document No. 03/134 – Interim RIO Rates 2003/04

<sup>21</sup> ComReg Document No. 03/125 – RIO Text Change, Version 3.2 to 3.3

<sup>22</sup> ComReg Document No. 03/122 – Other RIO Services: Order Handling Charges

<sup>23</sup> ComReg Document No. 03/113 - Consultation Paper on the application of retention rates in the Number Translation Code market.

<sup>24</sup> ComReg Document No. 03/119 - Partial Private Circuits: Update on Pricing and Migration

The in-situ transfer of leased lines is an efficient means by which a customer with an existing leased line who wishes to change supplier for that leased line, but continue receiving an identical service, can do so with the utmost of ease and minimum expense.

ComReg issued this direction in draft form after almost twelve months of discussion with eircom/ the industry in light of the fact that an in-situ transfer process is of interest to both consumers and the industry. This allowed interested parties to comment on the features of such a process in an effort to ensure that the process adopted meets market needs and is implemented in a speedy manner. In this paper ComReg directs that *eircom* set out its proposals for a cost-oriented and efficient in-situ transfer process<sup>25</sup>. *eircom* are due to provide these proposals on 11<sup>th</sup> December 2003.

### **5.2.9 Fixed Wireless Access 3.5GHz Licences**

On 28th November ComReg announced the granting of 32 Fixed Wireless Access Local Area licences in the 3.5GHz band. These licence offers were made following the completion of the first phase of a two phase licensing scheme for the provision of broadband services on a local area basis. The competition ranked applications on the basis of their tariff offers for broadband services and voluntary performance guarantee bonds as set out in the guidelines for applications<sup>26</sup>. Resulting from these offers, 7 applicants have now accepted ComReg's offer of licences for various parts of the country. Two operators have declined the offers of licences which means that the next best qualified candidates can be offered licences in these areas.

## **5.3 National Conference**

On 1st of October 2003 ComReg held its annual conference entitled 'Get Connected' which was opened by Dermot Ahern TD, the Minister for Communications, Marine and Natural Resources and which was attended by over 150 people representing the telecoms industry, Government Departments, public sector bodies and regional authorities. Speakers included Senator Fergal Quinn and UK Telecommunications expert Professor Jim Norton. The conference addressed Ireland's relatively low take-up of broadband to date and ways in which it might be increased, including a greater focus on consumer concerns and demand stimulation. Copies of all presentations made at the Conference can be found on ComRegs website. A consumer leaflet to assist people who are interested in finding out the benefits of and how to enhance their internet service was distributed at the conference and is also available on the ComReg website.

## **5.4 Mobile**

### **5.4.1 Addressing the impact of Mobile Number Portability on user awareness of calls to other networks**

The introduction of Mobile Number Portability (MNP) stimulates competition and brings significant consumer benefits by removing a major barrier to changing from operator to operator<sup>27</sup>. This consultation paper outlined options for developing a uniform solution to provide tariff transparency in the context of mobile to mobile calls, since the tariff differentials between on-net and off-net calls are currently significant, although these differentials may reduce or be eliminated over time, given technological, market and pricing developments. A response will be issued shortly.

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<sup>25</sup> ComReg Document No's 02/123 & 02/133 – 'In-Situ' Transfer of Leased Lines

<sup>26</sup> ComReg Document No. 03/97 – Guidelines to Applicants for Fixed Wireless Access Local Area – 3.5GHz Licences

<sup>27</sup> ComReg Document No. 03/121 - Addressing the impact of Mobile Number Portability on user awareness of calls to other networks

### **5.4.2 Regulatory approach to bundling and temporary discounts**

The term bundling is generally used to describe the practice of conditioning the sale of one product on the purchase of another product. Tying is considered as a special case of bundling where one or more of the products in a bundle is only available as part of the bundle. In some circumstances bundling can be beneficial to consumers by providing cost savings and a choice of packages to suit their own particular calling patterns. Temporary discounts are used by operators as a retail marketing tool, such as, discounts on standard prices and sometimes include extra services provided for free.

In order to provide some discussion of regulatory issues, and options for regulatory measures for retail bundled products and temporary discounts ComReg published a discussion paper<sup>28</sup> seeking views from interested parties on whether any specific regulation should apply to these products; in what circumstances regulation should apply; what type of regulation should apply; and other issues in this context that need to be considered.

## **5.5 Radio Spectrum and Technology**

### **5.5.1 Programme of Measurement of Non-Ionising Radiation Emissions**

Recognizing the need for ongoing investment in infrastructure and to better inform the public about the compliance of radio installations with international guidelines for public exposure limits to non-ionising radiation, ComReg put in place an extensive programme to measure non-ionising radiation levels at up to 400 antenna sites around the country.

ComReg's report<sup>29</sup> shows that of the first 100 antennae sites surveyed all were found to be significantly below the public exposure emission limits set down by the International Commission on Non-Ionising Radiation Protection (ICNIRP). This is the first of three reports which will contain the results of the site surveys on an ongoing basis.

## **5.6 General**

### **5.6.1 Green Paper on Services of General Interest – ComReg Response to Consultation**

The EC objective of economic integration focussed on the removal of barriers to trade between Member States and in particular a number of services of general economic interest have been gradually opened up to competition. In May the European Commission published a Green Paper on Services of General Economic Interest. In its response<sup>30</sup> ComReg questioned whether a general framework covering such a broad range of activities such as commercial activities in the energy, electronic communications and transport industries to public services such as health, education and social services at such a high level would achieve anything not already achieved by the sectoral frameworks.

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<sup>28</sup> ComReg Document No. 03/120 – Regulatory Approach to Bundling and Temporary Discounts

<sup>29</sup> ComReg Document No. 03/132 – Programme of Measurement of Non-Ionising Radiation Emissions

<sup>30</sup> ComReg Document No. 03/112 – Green Paper on Services of General Interest, ComReg Response to Consultation

## **5.7 Statutory Instruments – Adopted by ComReg**

### **5.7.1 S.I. 505 of 2003**

This Order provides for the exemption of certain wireless telegraphy stations and apparatus from the requirement to be licensed under the Wireless Telegraphy Act, 1926.

### **5.7.2 S.I. 506 of 2003**

These Regulations provide for the amendment of the basis for calculating annual fees payable for licences for apparatus for wireless telegraphy television programme retransmission systems.

### **5.7.3 S.I. 507 of 2003**

The purpose of these Regulations is to provide for the amendment of the basis for calculating annual fees payable for licences for apparatus for wireless telegraphy television programme retransmission systems.

### **5.7.4 S.I. 529 of 2003**

The purpose of these Regulations is to provide for the issue of licences for apparatus for wireless telegraphy used for the purposes of distributing programme services and television programme retransmission systems and for the payment of licence fees.

### **5.7.5 S.I. 530 of 2003**

These Regulations provide for the amendment of the principal licences to keep and have possession of apparatus for wireless telegraphy for the purpose of using FWA for the provision of telecommunications access network and services on a local area per base station basis in order to ensure the enforceability of commitments made in the course of a comparative or competitive evaluation procedure.

## **5.8 Statutory Instruments – Adopted by the Minister**

### **5.8.1 S.I. 535 of 2003**

The purpose of these Regulations is to give legal effect to Directive 2002/58/EC of the European Parliament and to the Council of 12<sup>th</sup> July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector. The provisions of Article 5.1 of the Directive relating to confidentiality of communications are not transposed in the Regulations as adequate provisions were already on the statute book by virtue of Section 98 of the Postal and Telecommunications Services Act of 1983 (No. 24 of 1983) as amended.

## 6 Consumer Focus

### 6.1 Consumer Complaints

ComReg will investigate a complaint if the consumer has first exhausted an operator's complaint handling process as set out in its Code of Conduct for Complaint Handling. These Codes of Conduct are available directly from the operator concerned either by contacting the operator directly or on their website.

There has been an increase in the number of Fixed Line consumer complaints received in Q3 in comparison with Q2. The majority of complaints received were in the Billing category, disputed premium rate call charges, CPS tariffs (selling practices and incorrect rates quoted) and call charges to UK non-geographic numbers at UK mobile rates.

The introduction of Mobile Number Portability (MNP) in July 2003 caused an initial increase in the number of complaints received in the Mobile Telephony category in Q3. The majority of these complaints were received in the first few weeks post launch as operators worked through some initial start-up problems. These issues are now fully resolved and the number of complaints received has since dropped accordingly.

Table 6.1 below illustrates the volume of complaints received this quarter compared to last quarter.

**Table 6.1 Consumer Complaints**

<i>Complaints</i>	<i>Q03 2003</i>	<i>Q02 2003</i>
<i>Fixed Telecommunications Operators</i>	222	191
<i>Mobile Telecommunications Operators</i>	81	28
<i>Broadcasting</i>	87	98

ComReg also receives general consumer queries on a wide range of Electronic Communication Network / Electronic Communication Services (ECN/ECS) issues. The majority of queries received relate to: Carrier pre Selection and Third Party Verification process (unable to cancel contract within 10 day period, Selling Practices, Winback Policies); Queried internet calls and associated charges; Internet access codes and Carrier pre Selection exclusion; Premium Rate Telecommunications Services; Unsolicited SMS/Fax/Calls.

Table 6.2 below illustrates the volume of queries received this quarter compared to last quarter.

**Table 6.2 Consumer Queries**

	<i>Q03 2003</i>	<i>Q02 2003</i>
<i>Queries</i>	1032	818

### 6.2 Fixed Telephony Operator Performance

In October, ComReg published the latest update on fixed telephony operator performance. The quality of service performance results covered the period from January to June of this year<sup>31</sup>. This leaflet is designed to provide consumers with an indicator of service quality for leading operators in the Irish business and residential fixed telephony markets. The leaflet is available by contacting ComReg (LoCall 1890 229668) or

<sup>31</sup> ComReg Document No. 03/131 – Fixed Telephony Operator Performance: A comparative guide for consumers

from the consumer section of our website at [www.comreg.ie](http://www.comreg.ie). If consumers require additional performance measures a more detailed report is also available on the ComReg website<sup>32</sup>.

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<sup>32</sup> ComReg Document No. 03/131a – Fixed Telephony Operator Performance: Detailed Business & Residential Results January to June 2003.

ComReg Document No. 03/131b – Fixed Telephony Operator Performance: SMP to OAO results – January to June 2003

## 7 Technology Developments

A key part of ComReg's role is to raise awareness of new and emerging telecommunications technologies in the ICT sector, with a view to encouraging the market's development. This work is carried out under ComReg's Forward-looking Programme (FLP) which is advised by a panel of external experts, the 'Forward-looking Programme Steering Panel', which held its second meeting in October. A compendium of four Briefing Notes on developments in ICT networking technology was also published during this quarter<sup>33</sup>. The individual topics of these Briefing Notes were previously prioritised by the Forward-look Programme Steering Panel.

The Steering Panel meeting was held at the Letterkenny Institute of Technology following this year's Information Technology and Telecommunications (IT&T) conference<sup>34</sup>. The main area of discussion was on the broad subject of telecommunications software and systems, and future Briefing Note topics were identified (e.g. billing and security). Taylor Reynolds of the ITU also gave a presentation on broadband initiatives around the world.

The compendium of Briefing Notes on developments in ICT networking technology consists of four individual notes on the following topics: peer to peer networking, ad-hoc and mesh networks, wireless metropolitan area networks, and developments in wireless link technology. Peer to peer networking allows end users to directly access and share resources such as content (e.g. file sharing) and computing power (e.g. grid computing) on other end users' computers over telecommunications networks. Ad-hoc networking technology can enable devices (e.g. a suitably equipped mobile phone or portable computer) to form networks by communicating directly with one another, without the need for existing telecommunications infrastructure such as masts, base stations and cables. Similarly mesh networking technology utilises individual users' devices to help form the network infrastructure, using them to pass on traffic from other users. Wireless metropolitan area networks are wireless access networks typically used to supply broadband services to end users within an urban area. New developments are emerging in the area of wireless link technology operating at higher frequencies than traditional microwave links (i.e. ~ 60GHz and above). These could help provide easily installable low cost high speed connections between points on a network, typically up to a few km apart.

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<sup>33</sup> ComReg Document 03/110 – Developments in ICT Networking Technology Compendium of Briefing Notes

<sup>34</sup> <http://www.ittconference.com/>

## 8 Postal Regulation

### 8.1 Regulation of Postal Services – Postal Service Authorisations, Reserved Area Controls & Levy Proposed Procedures

On 1 October 2003 ComReg issued a consultation<sup>35</sup> on the proposed procedures for authorising postal service providers which included the relevant application documents and text of an official authorisation once approved. The consultation also covered proposals for ensuring that the services reserved to An Post are respected and for modifying the postal levy to take account of the additional functions required of ComReg in authorising postal service providers.

This consultation ran from 1 October 2003 to 29 October 2003. A total of 7 responses were received and a response to the consultation was published<sup>36</sup> on the 2<sup>nd</sup> December, 2003, setting out the procedures that will apply from 1 January 2004.

There will be an electronic application form giving details of the applicant and the postal services provided, which must be accompanied by a written declaration that the services do not infringe the reserved area of An Post. When ComReg is satisfied that all the documentation required has been submitted and that the services provided do not infringe the reserved services it will grant a postal service authorisation to the Applicant. Procedures for ensuring that the reserved services are respected will be fully integrated with the authorisation procedures. Specific tests will be applied to determine whether a proposed service infringes the reserved services. Refused applicants will be free to challenge a decision that their services infringe the reserved area.

As provided by the Communications Regulation Act, 2002, going forward all holders of postal services authorisations will be required to pay the Postal Levy. To make the scheme fair and equitable ComReg decided to impose a levy based on a percentage of turnover. Different levy percentages will be applied to services provided by the designated universal postal service provider within the universal service area (0.25%) and all other providers of services, including services outside the scope of the universal service provided by the universal service provider (0.075% with a minimum levy of €1,000), to reflect the different levels of ComReg's responsibilities within the two areas. A revised levy order will be made before these arrangements come into effect on 1 January 2004.

### 8.2 Terminal Dues Agreements – Compliance with Regulation 10(1) of S.I. 616 of 2002

In accordance with Regulation 10(2) S.I.No 616 of 2002, ComReg requested An Post to bring its Agreements on Terminal Dues<sup>37</sup> into compliance with its obligations<sup>38</sup> no later than 7 July 2003, a deadline that was extended to 22 July 2003. ComReg is concerned that this matter has not yet been resolved given both its importance and the significant adverse financial impact (both intra and extra-EU) inbound international mail currently has on An

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<sup>35</sup> ComReg Document No 03/117 – Consultation Postal Service Authorisations, Reserved Area Controls & Levy Proposed Procedures

<sup>36</sup> ComReg Document No. 03/139 - Decision Notice & Response to Consultation: Regulation Postal Services, Postal Authorisations reserved area controls and levy procedures.

<sup>37</sup> ComReg Document No 03/40 - Information Notice Terminal Dues Agreement

<sup>38</sup> To ensure that terminal dues shall be fixed in relation to the costs of processing and delivering incoming cross-border mail.



Post. An information notice<sup>39</sup> was published on 23 October 2003 which sets out the issues to be considered by An Post and issues to be considered in relation to extra EU mail (UPU Convention). Further, the recent price increase for domestic mail in Ireland has increased the disparity between the price that posters of bulk mail in Ireland have to pay to An Post and those that postal service providers outside of Ireland can offer for delivery of mail in Ireland. ComReg has expressed its continuing concern to An Post at the adverse impact not resolving this issue can bring to the Irish consumer, while accepting that An Post's negotiating strategy is entirely a matter for the company.

### **8.3 An Post's Quality of Service – Domestic single piece mail**

On 21 November 2003 ComReg published the third quarter results<sup>40</sup>, 1 July to 30 September 2003<sup>41</sup>, which indicated that only 76% of single piece mail items were delivered the working day after posting. The cumulative result for the first three quarters of 2003 is 73% against the target set by ComReg in line with international best practice of 94%. The report also showed 79% of mail for local delivery was delivered the day after posting while 73% of single piece priority mail from provincial centres to addresses in Dublin was delivered the day after posting.

### **8.4 An Post's Code of Practice**

ComReg received a draft code of practice from An Post in August in accordance with Decision 7 of the response to consultation ComReg 03/50<sup>42</sup>. ComReg has asked An Post to revise the code of practice as submitted in respect of complaints to make provision for compensation and / or reimbursement in the event of loss, damage or undue delay. A revised proposal is due by the end of November.

### **8.5 Post Codes**

ComReg's symposium on Postcodes which was held on Monday 24 November 2003 stimulated an interesting debate. It was noted that Ireland is almost unique in Europe in not having a public post-code, despite the fact that some 40% of addresses are non-unique here. Alternative operators outlined how important they consider publicly available post-codes not alone in Ireland to open up the market, but also in the correct and speedy handling of materials being sent from abroad. It raises issues for economic and social research and for large mailers such as the ESB and companies selling on internet and over the phone. An Post noted that their system is adequate to their needs. ComReg has published the presentations given at the symposium on its website as ComReg 03/136 and CP 17 to CP 24. ComReg would like to follow on from the symposium by issuing a report on the matter in the New Year. To help us in this task ComReg has invited interested parties to forward to us their views on the issue by Tuesday 6 January 2004<sup>43</sup>.

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<sup>39</sup> ComReg Document No 03/130 – Information Notice Terminal Dues Agreement

<sup>40</sup> Details provided by TNS mrbi in accordance with the terms of the three year contract signed with ComReg from 1st January 2003.

<sup>41</sup> ComReg Document No 03/135 - An Post's Quality of Service Domestic single piece mail. Quarter 3, July to September 2003

<sup>42</sup> ComReg Document No 03/50 - Postal Services – Universal Services Obligation, Tariff Principles and miscellaneous issues.

<sup>43</sup> ComReg Document No 03/138 - Consultation Paper: Follow up on ComReg Postcode Symposium

## Appendix I: Documents Issued September – December 2003

### Fixed

<i>Document No.</i>	<i>Title</i>
03/140	ComReg's Review of the Text of <i>eircom</i> 's Reference Interconnect Offer
03/137	Amendment of <i>eircom</i> 's Customer Sited Interconnect Prices
03/134	Interim RIO Rates 2003/04
03/133	'In-Situ' Transfer of Leased Lines
03/125	Information Notice: RIO Text Change, Version 3.2 to 3.3
03/123	'In-Situ' Transfer of Leased Lines
03/122	Other RIO services: Order Handling Charges
03/119	Partial Private Circuits: Update on Pricing and Migration
03/116	Information Notice: Text of Amendment to ComReg 03/55
03/115	Response to Consultation and Decision Notice – ComReg's review of Carrier Pre Selection in Ireland 2003
03/114	Final Determination No. 02/03 – Summary of Investigation into FRIACO Constraints
03/111	Response to Consultation & Decision Notice D19/03 – Payphone Access Charge, Industry Implementation

### Mobile

<i>Document No.</i>	<i>Title</i>
03/128	Market Analysis – The wholesale national market for international roaming on public mobile networks
03/127a	Market Analysis – Wholesale voice call termination on individual mobile networks
03/121	Addressing the impact of Mobile Number Portability on user awareness of calls to other networks
03/120	Regulatory approach to Bundling and Temporary Discounts
03/118R	Review of the Mobile Phone Market – ComReg presentation to Oireachtas Communications Committee 2 <sup>nd</sup> October 2003

### Consumer Issues

<i>Document No.</i>	<i>Title</i>
03/131b	Fixed Telephony Operator Performance: SMP to OAO results – January to June 2003
03/131/a	Fixed Telephony Operator Performance: Detailed Business and Residential Results – January to June 2003
03/131	Fixed Telephony Operator Performance – A comparative guide for consumers
03/129	Guidelines for the inclusion of a minimum set of requirements in contracts with end users

**Post**

<i>Document No.</i>	<i>Title</i>
03/139	Decision Notice & Response to Consultation: Regulation Postal Services, Postal Authorisations reserved area controls and levy procedures
03/138	Consultation Paper: Follow up on ComReg Postcode Symposium
03/135	An Post's Quality of Service Domestic Single Piece Mail – Quarter 3 July to September 2003
03/130	Terminal Dues Agreements – Compliance with Regulation 10(1) of SI 616 of 2002
03/117	Regulation of Postal Services – Postal Service Authorisations, Reserved Area Controls & Levy Proposed Procedures

**Radio Spectrum/Technology**

<i>Document No.</i>	<i>Title</i>
03/132	Programme of Measurement of Non-Ionising Radiation Emissions
03/110	Developments in ICT Networking Technology – Compendium of Briefing Notes

**Numbering**

<i>Document No.</i>	<i>Title</i>
03/143	Irish Telephony Numbering Scheme Status Report December 2003
03/142c	National Numbering Conventions (Tracked Document)
03/142b	Numbering Application Procedures and Application Forms (Draft)
03/142a	National Numbering Conventions (Draft Document)
03/142	Updated Numbering Conventions and Number Application Process
03/141	Response to Consultation Paper on the application of retention rates in the Number Translation Code market
03/113	Consultation Paper on the application of retention rates in the Number Translation Code market
03/109	Interim Rates for NTC Services effective from 1 <sup>st</sup> October 2003

**General**

<i>Document No.</i>	<i>Title</i>
03/127b	Market Analysis – Fixed and Mobile User Research
03/124	Fees for Authorisations and Rights of Use (Response to further consultation questions)
03/112	Green Paper on Services of General Interest: ComReg response to consultation

**National Conference - Get Connected**

<b><i>Document No.</i></b>	<b><i>Title</i></b>
CP16	National Conference 2003 – Professor William Webb – Future Trends in Mobile Demand
CP15	National Conference 2003 – Paul McSweeney – Evaluation of Business User Demand for Telecommunications in Ireland
CP14	National Conference 2003 – Case Study – Chambers of Commerce of Ireland
CP13	National Conference 2003 – Case Study – South West Regional Authority
CP12	National Conference 2003 – Case Study – Border Midlands Western Regional Assembly
CP11	National Conference 2003 – Professor Jim Norton – Making Life Easier for Customers
CP10b	National Conference 2003 – Senator Feargal Quinn – Grocery Lessons for the Internet
CP10a	National Conference 2003 – Senator Feargal Quinn Speech – Grocery Lessons for the Internet
CP09	National Conference 2003 – Chairperson’s Forward

### **Symposium on Postcodes**

<b><i>Document No.</i></b>	<b><i>Title</i></b>
03/136	ComReg’s Symposium on Postcodes – Introduction by Chairperson
CP17	Principles of Postcoding – Peter Douglas, Royal Mail
CP18	Operational, customer services and cost implications of the absence of a Postcode system in Ireland for multinational postal service operators – Mr. Mike Farrell DHL
CP19	Direct Mail and Postcodes – Mr. Alistair Tempest FEDMA
CP20	Meter Point Reference Numbers – Mr. Paul Mallon ESB Networks
CP21	The An Post View – Mr. Derek Kickham An Post
CP22	Postcodes, Colm Reilly PA Consulting
CP23	Postcodes as National Infrastructure – Brendan Whelan, Dir ESRI
CP24	Postcode Symposium – Presentation by Prof. Ruairi O hUiginn