



Commission for  
**Communications Regulation**

## Irish Communications Market

### Quarterly Market Commentary

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## 1 Foreword

This report updates information on the Irish Communications Sector for the period 1<sup>st</sup> April to 30<sup>th</sup> June 2004. In this report we also publish a survey on Internet-related activity.

Mobile penetration increased to 89% with approximately 3.5m mobile subscribers. SMS messages reached 896m during the quarter. Furthermore over 142,000 subscribers have ported their mobile number since the introduction of Mobile Number Portability in August 2003. Vodafone and O<sub>2</sub>'s market share has remained relatively stable for the past three years. Meteor's market share also remained at 6% since last quarter.

Overall revenues for the fixed, mobile and broadcasting sectors have increased 4% since the same quarter last year, while OAO (Other Authorised Operators) market share stands at 20% for the period. The number of subscribers to digital television has reached 449,000 this period, representing 53% of all Pay TV households and 33% of all households with a television. More than one in four of all digital subscribers now subscribe via cable/MMDS.

Also launched in this quarter was the wholesale line rental product which allows consumers to have a single bill for both their fixed line rental and fixed calls. This product is currently offered by 3 OAOs. In the period from launch to the end of August 2004, over 17,000 subscribers have taken the product. The fact that further OAOs scheduled to launch their offering of this product shortly combined with the level of interest from consumers to date would indicate that Single Billing can play a valuable role in stimulating further competition in the market place here.

ComReg commissioned Amarach Consulting to carry out Consumer TrendWatch survey in order to track trends in information and communications technologies in Ireland the results of which are included in section three of the report. The main findings show as with mobile telephony and internet, consumer behaviour in relation to eCommerce appears to be showing signs of maturing. The survey results also showed that Irish consumers are very satisfied with their ICT experiences which would indicate that there is little threat of a reversal in usage trends.

On postal following consultation ComReg has set quality targets for single piece priority mail posted and delivered within the state. These are 94% for next day delivery and 99.5% for delivery within three working days. A Quality of Service report was also published on An Post's quality of service performance for the half year January to June 2004.

Key regulatory developments this quarter were the publication of a number of market reviews under the new regulatory framework. These included a consultation on the implementation of remedies for the Wholesale Broadcasting Transmission market, SMP designation for the Voice and Call Termination on Individual Mobile Networks Market, notification to the European Commission for Wholesale Broadband Access and a national consultation for Retail Access and Retail Calls. Additionally ComReg published proposed prices for eircom's unbundled local metallic path rental charge and concluded a review of eircom's reference Interconnect Offer.

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 01 April to 30 June 2004, except where otherwise stated.

Total revenues for fixed, mobile and broadcasting increased by 3% this quarter. This is mainly attributable to a growth in mobile revenues. Additionally, total revenues increased 4% since 2003. Since 25 July 2003 the general and basic licence regime has been replaced by General Authorisations under the new EU Regulatory Framework.

### 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.

ISDN channels have increased to 423,000, primary rate ISDN access account for more than half of these channels. DSL take-up has increased over the last quarter by 44% (55,500 up from 38,600). FRIACO – wholesale flat rate services - were launched at the end of June 2003 and there are now approximately 81,900 FRIACO subscribers which represents an increase of 30% from 63,100 in the last quarter.

### Mobile

The mobile penetration rate now stands at 89%, an increase of 1% since our last review. Meteor accounts for 6% of this market with Vodafone and O<sub>2</sub> having 54% and 40% respectively. All operators have increased their subscriber base since the last quarter. Each mobile subscriber sent on average 85 messages each month.

### Internet

The results of the Amárach Consumer TrendWatch research show that 46% of all adults with a fixed line telephone have Internet access at home<sup>1</sup>. PSTN remains the predominant access technology for residential users followed by ISDN. 18% use it daily or almost every day while 40% use it several times a week. Internet usage is subject to seasonal fluctuations and as this survey was conducted during the summer, it would not be unusual to see some decline in Internet usage in this period. For the same period last year, there was a similar decline of 6% in those accessing the Internet on a daily basis<sup>2</sup>. E-commerce appears to have remained static this quarter, with 42% of adults with a PC having made a purchase on the Internet in the last three months.

### Cable/MMDS & Satellite

At 449,000, total digital subscribers in Ireland now represent 53% of all Pay TV households and 33% of all households with a television, up from 28% in 2003. Total cable/MMDS revenues have decreased by 2.8% since last quarter.

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1 Adults aged 15 – 74.

2 Amárach Consulting. TrendWatch Survey, September 2003 available at [http://www.comreg.ie/\\_fileupload/publications/ComReg03108c.pdf](http://www.comreg.ie/_fileupload/publications/ComReg03108c.pdf)

## Tariffs

Ireland's position has improved by one place in both of the national PSTN baskets but remains unchanged in the remaining PSTN baskets. Ireland is third in the national leased line basket (this realignment is because tariffs for Sweden were unavailable this quarter, which held number one position last quarter). Ireland's position has fallen by one place in both of the ADSL baskets. Ireland's position has improved one place in the Residential Basic Rate ISDN basket but remains unchanged in the remaining ISDN baskets. Ireland's position remains unchanged in all of the mobile baskets.

### 3 Consumer TrendWatch

Each quarter Amarach Consulting carries out a Consumer TrendWatch survey in order to track trends in information and communications technologies in Ireland. This quarter’s survey looks at trends in fixed and mobile phone usage, Internet usage and eCommerce. Given the sample size of just over 1,000 adults, there is a margin of error of +/- 3%.

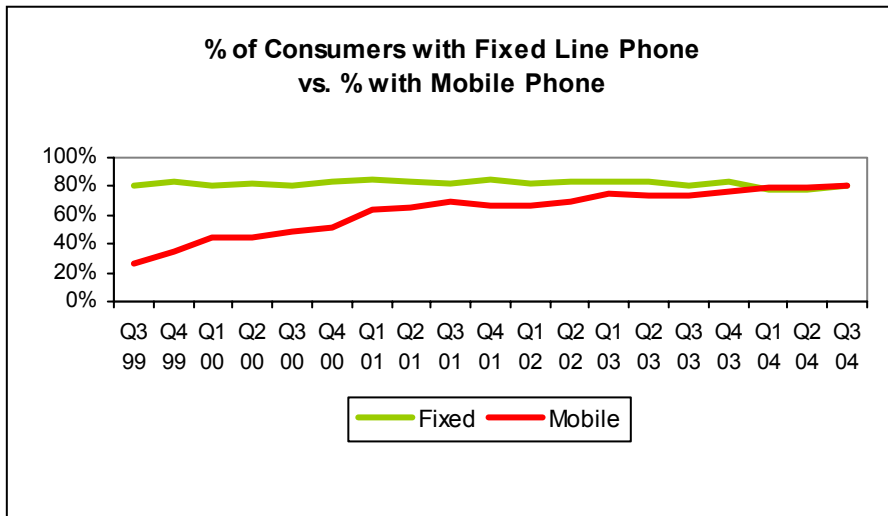
#### 3.1 Summary

After a five year period of steady growth in mobile phone, internet and ecommerce usage, the survey suggests that Ireland is entering a mature phase in its adoption and use of information and communications technologies (ICT).

Irish consumers appear to be satisfied with their ICT experiences as witnessed by the high take-up of mobile phones.

#### 3.2 Fixed and Mobile Phone Usage

Perhaps the single biggest change in the past five years since Amarach began tracking trends in the ICT sector has been the growth in mobile phone ownership. Currently four in five Irish adults own a mobile phone compared to one in five in 1999. The mobile phone market appears to be reaching maturity although penetration continues to increase year on year. The following chart illustrates that the percentage of adults who own a mobile phone is now equal to the percentage of those who own a fixed line.

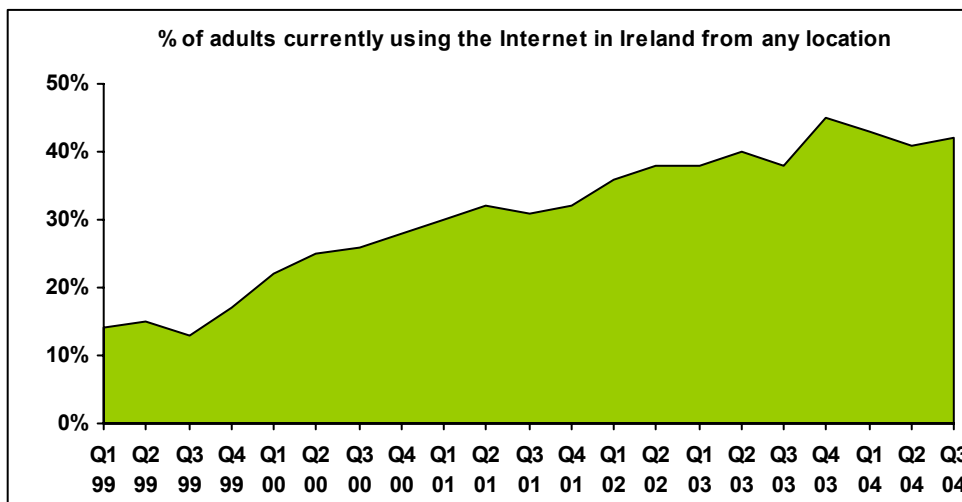


Source: Amarach Consulting. Consumer TrendWatch Q03 2004



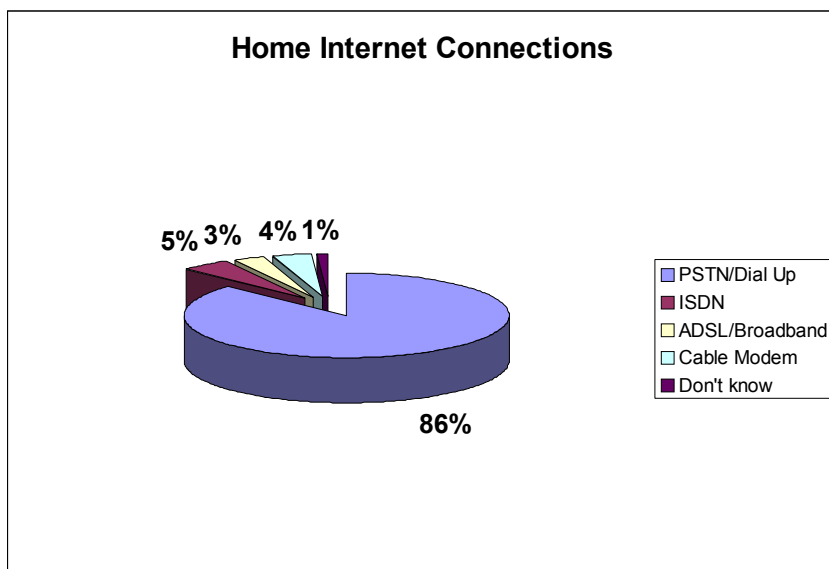
### 3.3 Internet Usage

In line with international experience, it appears that Internet usage in Ireland is maturing with between 41-44% of Irish adults accessing the Internet (from any location) over the past four quarters.



Source: Amarach Consulting. Consumer TrendWatch Q03 2004

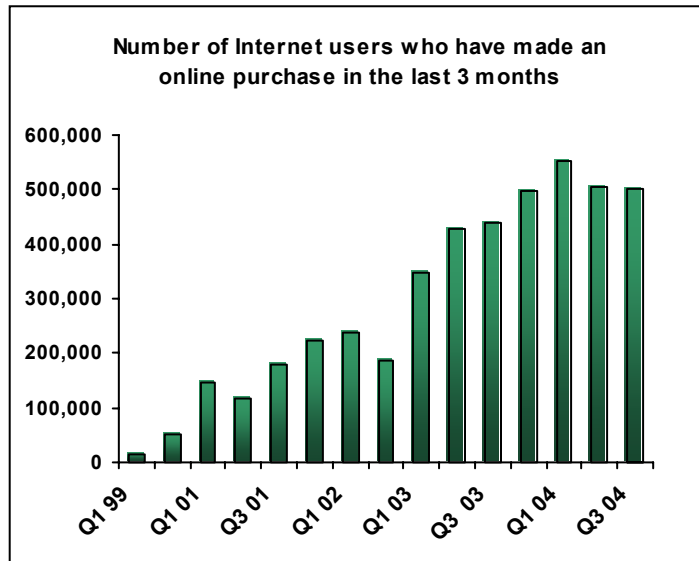
The home has remained the dominant point of access to the Internet (30%), followed by the work place (14%). The primary method of access from the home remains the standard telephone line (86%), followed by ISDN (5%), Cable Modem (4%) and DSL (3%). There is the possibility that growth in broadband may replace other access channels, such as ISDN and PSTN, which are used by existing home internet users.



Source: Amarach Consulting. Consumer TrendWatch Q03 2004

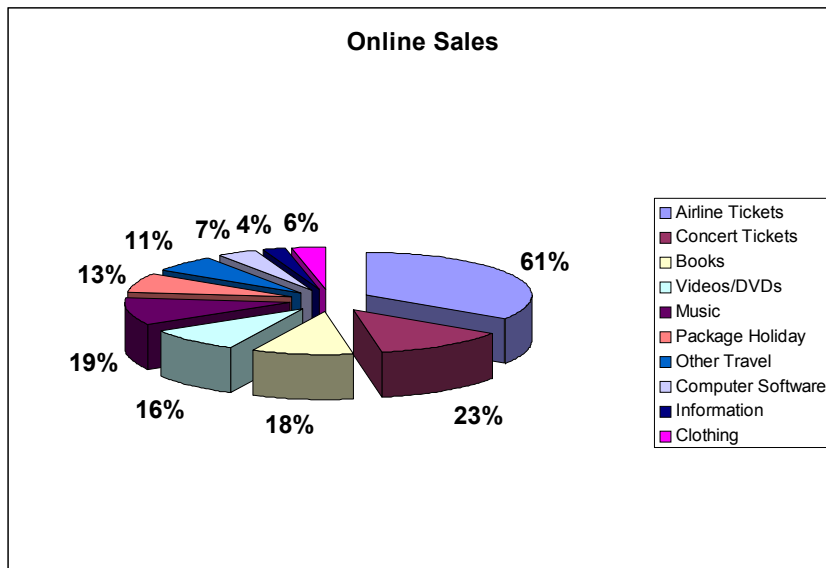
### 3.4 eCommerce

As with mobile telephones and the Internet, eCommerce usage appears to be maturing also, although seasonal factors must also be taken into account when analysing data over the past 3 quarters. .



Source: Amarach Consulting. Consumer TrendWatch Q03 2004

The composition of purchases also appears to have settled into a predictable pattern with airline tickets, concert tickets remaining the top two online purchases for the past four quarters while books, videos and music jostle each quarter for the number three position.



Source: Amarach Consulting. Consumer TrendWatch Q3 2004

## 4 Regulatory Developments

The following publications and developments relate to the period 17<sup>th</sup> June to 7<sup>th</sup> September 2004:

### 4.1 EU Framework

#### **4.1.1 Market Analysis: Consultation on Implementation of Remedies – Wholesale National Markets for Analogue Broadcasting Transmission**

This consultation document outlines the nature of the potential competition problems identified in the wholesale national markets for analogue broadcasting transmission<sup>3</sup>, the principles to be applied when selecting appropriate remedies and the detail of the proposed remedies.

#### **4.1.2 Market Analysis: Wholesale Voice Call Termination on Individual Mobile Networks**

This decision notice<sup>4</sup> designates Vodafone, O<sub>2</sub>, Meteor and ‘3’ as having Significant Market Power (SMP) in the wholesale markets for voice call termination on their respective individual mobile networks.

#### **4.1.3 Market Analysis: Wholesale Broadband Access (Response to Consultation Document 04/25 and Draft Decision)**

This response to consultation<sup>5</sup> outlines the conclusions of ComReg’s review of the market for wholesale broadband access and also contains a consultation on the draft decision on the obligations proposed. In the analysis of the market ComReg found that *eircom* is dominant and that regulatory intervention is required to address the potential competition problems in the market.

#### **4.1.4 Market Analysis: Retail Fixed Narrowband Access Markets**

This consultation is a review of retail markets identified as access to the public telephone market at a fixed location. ComReg’s preliminary conclusion is that *eircom* has SMP in both the Lower level and Higher Level Access markets defined.

#### **4.1.5 Market Analysis: Retail Fixed Call Markets**

This consultation is a review of market identified by the European Commission as publicly available telephone services provided at a fixed location. ComReg’s preliminary conclusion is that *eircom* has SMP in the markets for Domestic and International Calls.

#### **4.1.6 General Authorisation: Amendment of Certain Terms & Conditions**

This consultation proposes amendments to the General Authorisation<sup>6</sup>. Key amendments proposed are to the conditions applicable to the provision of publicly available telephone systems by means of carrier pre selection (CPS) and obligations to maintain systems which ensure correct customer billing.

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<sup>3</sup> ComReg Doc. No. 04/80: Consultation on Implementation of Remedies – Wholesale National Markets for Analogue Broadcasting Transmission

<sup>4</sup> ComReg Doc. No. 04/82: Market Analysis – Wholesale Voice Call Termination on Individual Mobile Networks

<sup>5</sup> ComReg Doc. No. 04/83: Market Analysis – Wholesale Broadband Access (Response to Consultation Document 04/25 and Draft Decision)

<sup>6</sup> ComReg Doc. No. 04/88: General Authorisation – Amendment of Certain Terms & Conditions

## 4.2 Fixed

### 4.2.1 Interim Rates for NTC Services effective from July 1<sup>st</sup> 2004

This document sets out the proposed interim rates for NTC services from 01 July 2004 to 30 September 2004<sup>7</sup>. These rates are based on information supplied to ComReg by *eircom*.

### 4.2.2 CPS Code of Practice Breach – *eircom* 'no contact' Breach

This information notice<sup>8</sup> contains details of a complaint made against *eircom* and the findings, of ComReg, in respect of a breach by *eircom* of an obligation under the CPS Code of Practice.

### 4.2.3 ComReg's review of the text of *eircom*'s Reference Interconnect Offer

This decision notice<sup>9</sup> concludes ComReg's review of the text of *eircom*'s Reference Interconnect Offer (RIO). The RIO sets out the terms and conditions on which interconnect is available at a wholesale level between *eircom* and other operators.

### 4.2.4 Local Loop Unbundling: Responses to Consultation on Operating Costs, Equipment Costs and Network Design Parameters

This document contains summaries of the responses received to two consultations<sup>10</sup> along with ComReg's final position on a number of methodological and technical issues relating to the appropriate estimation of LRIC costs<sup>11</sup>.

### 4.2.5 Local Loop Unbundling: Review of *eircom*'s Unbundled Local Metallic Path (ULMP) Rental Charge

This document proposes prices for *eircom*'s unbundled local metallic path (ULMP) rental charge<sup>12</sup>.

## 4.3 Radio Spectrum and Technology

### 4.3.1 Numbering for VoIP Services

This consultation document<sup>13</sup> introduces issues surrounding the introduction of VoIP services in Ireland. The main issue being consulted on is the numbering of VoIP services.

### 4.3.2 Use of Mobile Telephony Interceptors in Ireland

This consultation document<sup>14</sup> seeks views on proposals for the use of GSM interceptors in Ireland.

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<sup>7</sup> ComReg Doc. No. 04/75: Interim Rates for NTC Services effective from July 1st 2004

<sup>8</sup> ComReg Doc. No. 04/76: CPS Code of Practice Breach – *eircom* 'no contact' breach

<sup>9</sup> ComReg Doc. No. 04/84: ComReg's review of the text of *eircom*'s Reference Interconnect Offer – Decision Note D10/04

<sup>10</sup> ComReg Doc. No. 04/21: Local Loop Unbundling Costing Consultation - Direct and Indirect Operating Expenditure Econometric Modelling

ComReg Doc. No. 04/31: Local Loop Unbundling Costing Consultation - Access Network Design Parameters and Costs of certain access network elements

<sup>11</sup> ComReg Doc. No. 04/90: Local Loop Unbundling: Responses to consultations on operating costs, equipment costs and network design parameters

<sup>12</sup> ComReg Doc. No. 04/91: Local Loop Unbundling: Review of *eircom*'s ULMP rental charge

<sup>13</sup> ComReg Doc. No. 04/72: Consultation Document – Numbering for VoIP Services

<sup>14</sup> ComReg Doc. No. 04/74: Consultation Paper – Use of Mobile Telephony Interceptors in Ireland

### **4.3.3 Radio Frequency Plan: National Table of Frequency Allocations for Ireland**

This latest edition of the National Radio Frequency Plan<sup>15</sup> details a number of significant changes that were introduced at the World Radiocommunications Conference in 2003 (WRC-03) and the advances made in harmonisation through CEPT Electronic Communications Committee Decisions and Recommendations.

### **4.3.4 Radio Frequency Identification Systems – Briefing Note**

This briefing note<sup>16</sup> introduces Radio Frequency Identification Systems (RFID) and identifies some of their many potential applications. Market and regulatory issues are outlined.

### **4.3.5 Opportunities for Trialling Wireless Services and Technologies in Ireland**

This document<sup>17</sup> consults on a series of initiatives aimed at encouraging the testing and development of new and innovative wireless technologies and services in Ireland.

### **4.3.6 ComReg Response to Consultation on Frequency Spectrum Policy for Digital Broadcasting (DAB)**

This Information Notice<sup>18</sup> sets out the response of ComReg to the consultation issued on frequency spectrum policy for digital broadcasting (DAB) by the Department of Communications, Marine and Natural Resources on 06 August 2004.

## **4.4 Postal**

### **4.4.1 Notification of extension to deadline for comments on: Regulation of Postal Services – Universal Service Obligation – Bulk Mail Access ComReg document no: 04/54**

This document<sup>19</sup> notifies all interested parties that the deadline for submissions to ComReg document no: 04/54 was extended to 25 June 2004.

### **4.4.2 Quality of Service Domestic Single Piece Priority Mail Performance of An Post**

This document reports on An Post's quality of service performance for the half year January to June 2004<sup>20</sup>.

### **4.4.3 Universal Service Obligation – Bulk Mail Access: Draft Direction to An Post**

This draft direction aims to ensure that businesses and organisations – who send bulk mail or who consolidate mail from different customers – have sufficient access points to An Post's system in order to meet their needs<sup>21</sup>.

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<sup>15</sup> ComReg Doc. No. 04/77: Radio Frequency Plan – National Table of Frequency Allocations for Ireland

<sup>16</sup> ComReg Doc. No. 04/79: Radio Frequency Identification Systems – Briefing Note

<sup>17</sup> ComReg Doc. No. 04/85: Opportunities for Trialling Wireless Services and Technologies in Ireland

<sup>18</sup> ComReg Doc. No. 04/93: ComReg Response to Consultation on Frequency Spectrum Policy for Digital Broadcasting (DAB)

<sup>19</sup> ComReg Doc. No.04/73: Notification of extension to deadline on comments on: Regulation of Postal Services – Universal Service Obligation – Bulk Mail Access ComReg Document No. 04/54

<sup>20</sup> ComReg Doc. No. 04/89: Quality of Service Domestic Single Piece Priority Mail, Performance of An Post

<sup>21</sup> ComReg Doc. No. 04/92: Universal Service Obligation – Bulk Mail Access – Draft Direction to An Post

## 4.5 General

### 4.5.1 *ComReg Newsletter Summer '04*

This is the first edition of ComReg's quarterly Newsletter<sup>22</sup> which is aimed at keeping those with a direct interest and the wider public, informed about the ongoing work of the Commission.

### 4.5.2 *ComReg Market Surveys – Residential Internet and Business Datacommunications Research*

This information notice<sup>23</sup> highlights the findings of two surveys commissioned by ComReg in recent months, namely: 1) Residential Internet Survey<sup>24</sup> (Amarach) and 2) Broadband and Datacommunications Survey<sup>25</sup> (TNS).

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<sup>22</sup> ComReg Document No. NL06/04: ComReg Newsletter Summer 04

<sup>23</sup> ComReg Document No. 04/78: ComReg Market Surveys – Residential Internet and business datacommunications research

<sup>24</sup> ComReg Document No. 04/78a: Amarach TrendWatch Report: Q2 2004

<sup>25</sup> ComReg Document No. 04/78b: Broadband Data Communications Survey: Charted Report

## 5 4.5. Consumer Focus

### 5.1 Consumer Complaints

#### 5.1.1 Lodging your complaint/query with ComReg

If, having exhausted a Service Provider's complaint handling process, a consumer feels that their complaint has not been adequately addressed; ComReg may then be contacted by the consumer to assist. Each operator is required to have a Code of Conduct for Complaint Handling. Each operator's code may be obtained directly from the operator concerned either by telephoning the customer care line or directly from the operator's website.

When examined on an annual basis, there has been a very significant increase in the number of complaints and queries received by ComReg in 2004 in comparison to 2003 as the following table indicates. Issues such as consumer overcharging by operators and the general availability of broadband services has driven much of this increase in consumer contact. ComReg is concerned that operator ineffectiveness in dealing with initial consumer complaints in a timely and effective manner may be a root cause for the overall upward trend. ComReg will continue to monitor the level of consumer complaints and will take all appropriate actions to address this issue with the relevant operators.

Table 5.1 below illustrates the volume of queries received during this quarter compared to earlier quarters.

**Table 5.1 Consumer Queries**

	<i>Jan-June 2003</i>	<i>July-Dec '03</i>	<i>Jan-June '04</i>	<i>% Change Jan-June '04 v July-Dec '03</i>	<i>% Change Jan-June '04 v '03</i>
<i>Complaints</i>	704	805	817	1%	16%
<i>Queries</i>	1414	2261	3565	58%	152%
<i>Total</i>	2118	3066	4382	43%	107%

Regarding Fixed line consumer complaints specifically, the majority of complaints related to billing and included disputed call charges due to poor quality of service and incorrect billing (charges for services not provided).

Regarding Mobile telephony the majority of complaints received in this category related to billing issues such as disputed charges due to poor network coverage, services cancelled and roaming.

The number of complaints in the broadcasting area has continued to decrease since the introduction of the new regulatory framework for electronic communications, in July 2003. ComReg no longer regulates retail television programme distribution and can no longer handle complaints directly but will pass them to the operator in question. The majority of complaints related to the level of customer care experienced.

ComReg also receives requests for information on matters concerning a wide range of electronic communication network/electronic communication services (ECN/ECS). ComReg received 1,746 queries in Q2. The majority of queries in Q2 related to availability of broadband, carrier pre selection (CPS), dialler programs and premium rate services.

## 5.2 Universal Service Obligation

In April 2004, ComReg issued a Direction<sup>26</sup> requiring *eircom* to submit its proposals no later than 30 June 2004 concerning the criteria which it would use to assess the reasonableness of requests for connections to the public telephone network. In the Direction, ComReg also set out its views concerning transparency of the order process and the need to keep users informed at all stages of the process. *Eircom* has submitted its proposals in this regard and these are subject to further discussion with the company.

## 5.3 Standards for Tariff Presentation

In August 2004, following earlier consultation ComReg issued its decision<sup>27</sup> regarding a code of tariff transparency. The issue is of importance because of the emergence of new technologies, products and services leading to more sophisticated tariff packages. As a consequence, users frequently have difficulties in distinguishing between the different pricing options available and are therefore unable to exercise an informed choice in relation to the range of services provided by different operators. The incidents of overbilling which have come to light in recent months also underline the importance of consumers being fully aware of the cost of using various services.

The Code consists of three broad principles – accuracy, comprehensiveness and accessibility – which should apply when price information is being presented to consumers. The decision notice also contains guidance on how ComReg consider the principles may be put into practice.

## 5.4 Price Information on Directory Enquiry Services

Also during August 2004, ComReg issued a decision regarding tariff information associated with Directory Enquiry Services. Directory Enquiry services offer a facility where the caller can be connected with the telephone number sought. ComReg research indicates that over 50% of people who avail of such a facility are not aware that the cost of doing so significantly exceeds the cost which would arise if dialled directly by the caller.

Following a public consultation, ComReg has issued a direction<sup>28</sup> requiring Directory Enquiry Service Providers, when offering call completion, to inform callers of the cost of using such a service. Because of the multiplicity of charges which apply depending on which network or service provider is used, the cost of information which is to be given is the cost of using the service from a landline along with an indication that different charges apply from other networks and service providers. This requirement comes into effect from 1 October 2004.

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<sup>26</sup> Decision Notice on Universal Service – Future Approach towards Provision of Access Decision No. D7/04, Doc No. 04/48 – 27 April

<sup>27</sup> ComReg Code for Tariff Presentation Decision No: D11/04 Doc.No. 04/86 – 12 August 2004

<sup>28</sup> Access to Tariff Information on Directory Enquiry Services Decision No. D12/04, Doc No. 04/87 – 12 August 2004



## 6 Postal Regulation

### 6.1 Quality of Service Domestic single piece mail – Performance of An Post

On 29 August 2004, ComReg published TNS mrbi's report on the half year performance from January to June 2004 inclusive and the reports on the first quarter (January to March 2004 inclusive) and second quarter (April to June 2004 inclusive) performances<sup>29</sup>.

The results for the first six months of 2004 show that, for mail posted throughout the state for delivery in the state, 70% was delivered on the next working day (excluding weekends and bank holidays) and 95% was delivered within three working days. There is a variation in the results for the different mail flows<sup>30</sup>. Mail posted in Dublin received substantially poorer levels of service than mail posted elsewhere - 66% compared to 74%. However only 69% of mail posted outside Dublin county for delivery in Dublin was delivered the following day. This reflects the fact that the disruptions predominantly affected sorting at the Dublin Mails Centre. It is important to note that regardless of the period of disruption, the service throughout the period measured falls significantly short of both the required standard of service set by ComReg and international best practice.

### 6.2 An Post's Quality of Service Target – Domestic single piece mail

Following a recent consultation<sup>31</sup>, ComReg set quality targets for single piece priority mail posted and delivered within the state. These are 94% for next day delivery and 99.5% for delivery within three working days. ComReg issued a formal direction to An Post under Regulation 4(1)(b) of SI No 616 of 2002 setting these targets and requiring An Post to submit, within 60 days, a copy of its timetabled implementation plan showing the date at which it expects to achieve its target. ComReg is currently assessing the plan which it has received. However, it is clear that An Post is some distance from meeting this target.

### 6.3 Universal Service Obligation – Bulk Mail Access - Direction to An Post

A consultation paper about ComReg's obligation to ensure that the number of access points to An Post's network meets the needs of users of the universal postal service was issued on 21 May 2004<sup>32</sup>. ComReg issued its Response to Consultation on 30 August 2004 regarding the density of access points for Bulk Mailers. As part of a pilot programme ComReg has published all of the submissions received as an Annex to the Response Document.

The Response Document sets out a Direction to An Post which provides that there will be at least one access point for bulk mail in every town with a population in excess of 15,000 and where a county does not have a town of that population, there will be an access point in the largest town of that county. For pre-sorted mail bulk mail customers will be able to deposit pre-sorted items at an access point in the Delivery Office from where such items would normally be delivered.

<sup>29</sup> ComReg Document No 04/89 –Quality of service domestic single piece priority mail, Performance of An Post

<sup>30</sup> Mail flows measured include mail posted in Dublin (City and County) for delivery nationwide, in Dublin and in areas outside Dublin and mail posted outside Dublin for delivery nationwide locally (i.e. in the same County) and in Dublin.

<sup>31</sup> Consultation Paper "Quality of Service Target 2004-Single Piece Priority Mail" Document 04/08, 3 February 2004. Response to Consultation "Quality of Service Target 2004-Single Piece Priority Mail" Document No 04/56, 1 June 2004.

<sup>32</sup> ComReg Document No. 04/54: Regulation of Postal Services – Universal Service Obligation – Bulk Mail Access – Direction to An Post

The Response to Consultation requests submissions regarding the length of time required to comply with the Direction; any foreseen difficulties for An Post in regard to compliance at specific locations; and, impacts for Customers or the development of the postal sector that are not set out in the Response Document. Such submissions should be forwarded to ComReg by 1 October 2004 at the latest and the Direction will issue to An Post shortly after that.

## 6.4 Pricing Application for Domestic USO Services, 2004

The Commission for Communications Regulation (ComReg) has been asked by An Post to approve proposals to increase the prices of the domestic postal services which are reserved to the company under the European Communities (Postal Services) Regulations, 2002. The last price increase was in August 2003 at which time an increase from 41c to 48c (17 %) was approved.

Under section 70 of the Postal and Telecommunications Services Act, 1983 (as amended) ComReg's prior approval is necessary before An Post can increase the price of postal services for items of correspondence weighing less than 100g<sup>33</sup>.

Under the European Communities (Postal Services) Regulations, 2002, S.I.616 of 2002, An Post is obliged to comply with the tariff principles i.e. affordable, geared to cost, transparent and non-discriminatory, in respect of all services within the scope of the universal service that An Post is required to provide. ComReg has a responsibility to monitor compliance with these principles. In practice however it is more efficient to monitor compliance with the tariff principles at the same time as deciding whether to approve An Post's proposals to increase the price for services within the reserved area.

ComReg is currently assessing An Post's latest price submission. Before any decision to grant a price increase is made, ComReg will conduct a public consultation, giving all interested parties the opportunity to make their views known on all proposals.

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<sup>33</sup> The weight limit does not apply if the price is equal to or more than three times the public tariff (currently 48c \* 3 = €1.44)

## 7 Technology Developments

One of the ways in which ComReg helps to promote innovation in the Irish telecommunications industry is by raising awareness of new and emerging telecommunications technologies. 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'. Information papers on emerging technologies known as 'Briefing Notes' are produced by the FLP, and during this quarter a Briefing Note on Radio Frequency Identification (RFID) technology was published<sup>34</sup>.

RFID systems can be considered as a new generation of bar-code technologies that enable information, such as identification codes, to be accessed over the air without the need of direct contact or a direct line-of-sight. Additionally, data can be stored on advanced RFID tags themselves. RFID systems can be applied to enhance business efficiency in many different situations, from automated consumer checkouts in supermarkets to pay-by-weight waste management systems. Recent technology developments in RFID manufacturing processes are bringing us to the point where low cost RFID technology can be extended to far more applications, potentially generating large amounts of data and corresponding telecommunications traffic. The briefing note document introduces RFID technologies and identifies some of their many potential applications. Market and regulatory issues, particularly relating to the global harmonisation of frequency spectrum for RFID systems to operate, are outlined.

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<sup>34</sup> Comreg document 04/79 - [http://www.comreg.ie/\\_fileupload/publications/ComReg0479.pdf](http://www.comreg.ie/_fileupload/publications/ComReg0479.pdf)

## Appendix I: Documents Issued April 04 – June 04

### Fixed

<i>Document No.</i>	<i>Title</i>
04/83	Market Analysis: Wholesale Broadband Access (Response to Consultation Document 04/25 and Draft Decision)
04/84	ComReg's review of the text of <i>eircom</i> 's Reference Interconnect Offer – Decision Note D10/04
04/90	Local Loop Unbundling: Response to Consultations on operating costs, equipment costs and network design parameters
04/91	Local Loop Unbundling – review of <i>eircom</i> 's ULMP Rental Charge
04/94	Market Analysis: Retail Fixed Narrowband Access Markets
04/95	Market Analysis: Retail Fixed Call Markets

### Mobile

<i>Document No.</i>	<i>Title</i>
04/82	Market Analysis: Wholesale Voice Call Termination on Individual Mobile Networks

### Consumer Issues

<i>Document No.</i>	<i>Title</i>
04/81	Protecting Phone Users from Internet Dialler Scam
04/86	ComReg Code for Tariff Presentation
04/86a	Tariff Presentation Code of Practice Consultation – Submissions to Consultation
04/87	Access to Tariff Information on Directory Enquiry Services
04/87a	Directory Enquiry Price Transparency for call completion consultation – Submissions to Consultation

### Broadcasting

<i>Document No.</i>	<i>Title</i>
04/80	Consultation on Implementation of Remedies – Wholesale National Markets for Analogue Broadcasting Transmission

### Post

<i>Document No.</i>	<i>Title</i>
04/73	Notification of extension to deadline on comments on: Regulation of Postal Services – Universal Service Obligation – Bulk Mail Access ComReg Document No. 04/54
04/89	Quality of Service Domestic single piece priority mail Performance

	of An Post
04/92	Universal Service Obligation: Bulk Mail Access – Draft Direction to An Post

### Radio Spectrum/Technology

<i>Document No.</i>	<i>Title</i>
04/72	Consultation Document – Numbering for VoIP Services
04/74	Consultation Paper – Use of Mobile Telephony Interceptors in Ireland
04/77	Radio Frequency Plan: National Table of Frequency Allocations for Ireland
04/79	Radio Frequency Identification Systems – Briefing Note
04/85	Opportunities for Trialling Wireless Services and Technologies in Ireland
04/93	ComReg Response to Consultation on Frequency Spectrum Policy for Digital Broadcasting (DAB)

### General

<i>Document No.</i>	<i>Title</i>
NL06/04	ComReg Newsletter Summer 04
04/78	ComReg market surveys: Residential Internet and business datacommunications research
04/78a	Amarach TrendWatch Report Q2 2004
04/78b	Broadband & Datacommunications Survey: Charted Report
04/88	General Authorisation – Amendment of Certain Terms and Conditions