



Commission for
Communications Regulation

Irish Communications Market

Quarterly Market Commentary

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An Coimisiún um Rialáil Cumarsáide

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1 Foreword

This report, covering the period October to December 2002 is the final review of the Irish Communications sector for 2002. Despite the fragility of the market, mobile penetration has reached 79%, increasing by 2% since our last review, while the growth in SMS continues. OLOs market share now stands at 20% - it has varied between 20% and 21% over the past couple of quarters. The number of DSL orders while still low in absolute terms continues to increase, with 20% of the total attributable to new entrant lines. Lower DSL pricing is essential to rapid growth, and it is expected that further offerings will be available shortly.

Key Regulatory developments this quarter include the finalisation of the prices for interconnect services provided by eircom, the publication of the price cap decision; on-going work on the development of private partial circuits (PPCs), CPS Single Billing Products and developments with Flat Rate Internet Access Call Origination (FRIACO) together with various documents concerning the New Regulatory Framework.

We carried out our third Consumer survey, conducted by the Market Research Bureau of Ireland Ltd (MRBI), in Jan / Feb 2003, results of which are included in section three of the report. Section four of the report includes the results of a Broadcasting survey carried out by MRBI in Nov/Dec 2002 on consumer attitudes and behaviour towards television services. Some indicators in the surveys point to low awareness of consumer rights. ComReg are actively addressing this through the publication of information leaflets, codes of conduct and various other consumer initiatives.

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 continue to 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.

Etain Doyle,
Chairperson
Commission for Communications Regulation.

2 Market Overview

This section of the report provides analysis on 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.

Total revenues for fixed, mobile and broadcasting decreased this quarter. The decrease of 2% is attributable to reduced revenues across all three sectors. However this does not indicate a trend as total revenues increased by approximately 5% in twelve months.

Fixed

The numbers of CPS lines have increased by 9% this quarter. While the number of CPS lines continues to grow there has been a 1% decrease in the fixed line revenue, which may be reflective of competitive pricing. In line with this, OLO market share has fallen by 1%, now standing at 20%. Two operators' commenced operations this quarter and six new licences were issued.

Mobile

Mobile penetration rate now stands at 79%, an increase of 2% since our last review. Meteor's share of the market has increased by 1% during the quarter while Vodafone and O2 account for 96% of the market. The growth in the number of SMS messages sent each quarter continues, with each mobile subscriber now sending on average 72 messages each month. This is up from 65 per month in the last quarter and from 52 messages per month for the same period last year.

Internet

ComReg commissioned *Amárach Consulting* to carry out residential Internet research and the results show that 40% of adults have Internet access at home¹, a four percent increase on the same period last year. There is a significant increase in e-commerce activity with 40% having made an on-line purchase in the last three months compared to 31% for the same period last year.

Cable/MMDS & Satellite

Total digital subscribers in Ireland now represent 26% of all households with a television, a 2% increase since last quarter. Increases in both cable/MMDS digital subscribers and satellite digital subscribers have contributed to this growth. Total cable/MMDS revenues have decreased by approximately 1% since last quarter. The decline in analogue subscribers resulted in a decline in revenue despite the price increases. This figure does not take account of BSkyB revenues.

Tariffs

ComReg have adjusted tariff comparisons to include EU countries only; however OECD methodologies are still being used. Ireland's position improved by two places in the national residential PSTN basket, which may be reflective of price reductions in late 2002, and remains in first place in the international leased line basket. Ireland has fallen by one place in all four of the mobile baskets.

¹ Adults aged 15 – 75 with a fixed line telephone.

3 Consumer Survey

During the quarter ComReg commissioned MRBI to examine the attitudes of Irish Consumers to telecommunications services in the Irish market. The interviews were conducted in January / February 2003 from 500 Consumers².

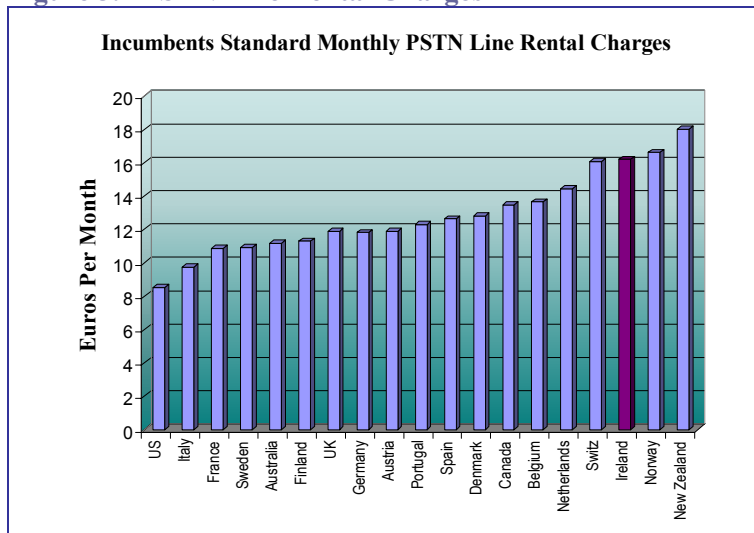
3.1 Summary

The principal findings from the consumer survey are as follows:

Consumers are aware of the choices available to them from competition in the fixed line sector and are being actively approached by suppliers other than *eircom* offering services to them (54%). However, the majority of consumers still use *eircom* for their landline calls. Most respondents believe that the market is more competitive than it was twelve months ago.

Two in five believe that their fixed line bill has increased in the last two years while approximately one third pays over €125 every two months on their fixed line telephone bill. This may be reflective of increases in PSTN line rental over the past twelve months. As figure 3.1 illustrates, Ireland has one of the highest PSTN line rental charges.

Figure 3.1 PSTN Line Rental Charges



Source: Teligen T-Basket, February 2003

In terms of the cost of mobile services, half of the sample indicate that they are unaware of the difference in the cost of calling a mobile customer on a different network compared to calling a customer on their own network.

Those who use their mobile abroad normally use the network that automatically appears on their handset instead of manually selecting the network. The network automatically selected by the handset may not always be the cheapest network and consumers should check with their mobile operator before they go abroad so they may manually select the cheapest network. More information can be found in ComReg’s recently published consumer guide on “Controlling your costs when using your mobile phone abroad³”.

² Margin of error: +/- 4.4%

³ http://www.comreg.ie/_fileupload/publications/cg02a.pdf

In terms of those consumers who have used directory enquiry services there was a significant lack of awareness of the increased cost of availing of the call completion service.

The results of the survey are outlined below.

3.2 General Attitudes

Table 3.1 illustrates the respondent’s general attitudes towards telecommunications, with nearly two thirds of the sample believing the market is more competitive than 12 months ago.

Table 3.1 General Attitudes towards Telecommunications

| | 2003 | 2002 |
|--|------|------|
| <i>I believe the residential telecommunications market is more competitive than 12 months ago</i> | 63% | 66% |
| <i>I believe that there are savings to be made by changing my home telecommunications supplier</i> | 40% | 34% |
| <i>The overall cost of my home telephone has reduced in the past 12 months</i> | 31% | 42% |

3.3 Fixed Line Suppliers

Awareness of CPS remains static with one third of those surveyed aware of the service. Over half of the sample (54%) has been approached by a supplier other than *eircom*, an increase on last year’s survey (43%). Currently, one in ten (11%) use a supplier other than *eircom* for landline calls. When specifically asked whether they had switched back to *eircom* 16% indicated they had. Cheaper calls (32%) and the inconvenience of having two bills (18%) were key reasons given. Following a recent decision by ComReg service providers will soon be able to offer consumers a single bill for line rental and call charges⁴.

3.4 Operator Services

Call barring is not widely used by consumers with 8% barring calls from their phone in order to control expenditure, mainly calls to mobile, international and premium rate numbers. In terms of information being available to help consumers choose their fixed line supplier, 37% believe that pricing information in the market is insufficient.

3.5 Mobile Phone Usage and Suppliers

Nearly three quarters (72%) of the sample indicate that they use a mobile phone regularly. Calls to other mobiles account for the largest proportion of calls made from mobile phones, followed by text messaging. Around one in ten (11%) switched mobile supplier in the past 12 months, mainly due to them changing their handset (39%).

3.6 Mobile Tariffs

When choosing a supplier, the monthly charge is the most important for consumers who have a contract with their mobile operator. There was a significant lack of awareness (53%) over the difference in calling a mobile on the same network compared to one on a different network considering the cost difference, although one third (34%) of the sample

⁴ ComReg Document No. 03/07 – Implementation of CPS Single Billing Products

indicate that their choice of provider was based on the mobile network subscribed to by people they call most often.

Irish mobile tariffs may vary depending on the network called by mobile customers. Consumers should contact their operator to find out the difference between the cost of calling a mobile on the same network compared to one on a different network as the costs vary depending on the operator and the tariff package.

3.7 Mobile Phone Usage Abroad

Nearly half of those with a mobile (47%) have used it abroad, with one fifth (20%) saying to do so regularly. Perceived awareness of the cost of using a mobile abroad increased from our survey last year (53% now aware), and an increase in those stating they know exactly how much it costs (2003:11% 2002: 6%). Four in five were aware that they are charged for receiving incoming calls when abroad, an increase on our survey last year. Given that over half (55%) of users are aware that the costs abroad vary depending on the network used it may be surprising that only 13% manually select the network they use when abroad.

Sending text messages is the most common means of reducing the cost of international roaming (89%); however this may not be appropriate for certain users.

3.8 Payphone Services

Over a quarter (28%) of respondents used a payphone at least once in the last three months. Four in five of those believe that a payphone provider should consult with the local community when either removing all payphones or reducing the number in a particular location.

3.9 Directory Enquiry Services

Over three quarters (77%) of those surveyed have used a directory enquiries service. Just over two in five (42%) indicated to have used the call completion service and of these 44% were not aware of the increased cost of using the service.

4 Television Services Consumer Survey

During the quarter ComReg commissioned MRBI to conduct a survey on consumer attitudes and behaviour with regard to television services. Between November and December, 819 interviews were conducted amongst a nationally representative sample of households in the Republic of Ireland⁵.

4.1 Summary

The principal findings from the consumer survey are as follows:

Over half of all households subscribe to Pay TV services via cable, MMDS and satellite (56%). Subscribers to Pay TV services have the highest representation in Dublin (42% of respondents that subscribe to Pay TV services are located in Dublin), perhaps due to the limited availability of cable/MMDS services in other areas.

In relation to customer satisfaction, nearly half of cable/MMDS subscribers had complained in the past about some aspect of their service compared with one in four for satellite⁶.

Of the 6% of Pay TV subscribers that had switched service provider in the past two years, the majority had switched to satellite. Half of those respondents that had not considered switching service provider in the last two years indicated that they were happy with their service.

One third of Pay TV households subscribe to digital television with a third of those subscribers having signed up within the past year.

4.2 Profile of TV Households

As can be seen in Table 4.1, the survey found that 56% of households subscribed to Pay TV services via cable, MMDS and satellite. A further 6% subscribe to deflector/local community services.

Table 4.1 Breakdown of television service usage

| <i>Non-Subscriber to Pay TV (44%)</i> | <i>Subscriber to Pay TV (56%)</i> |
|--|-----------------------------------|
| <i>Irish channels only (20%)</i> | <i>Cable connection (30%)</i> |
| <i>UK & other channels (18%)</i> | <i>Satellite dish (20%)</i> |
| <i>Deflector/Local Community Aerial (6%)</i> | <i>MMDS aerial (6%)</i> |

Of those not currently subscribing to Pay TV services, 12% reported to have done so at some time in the past. Of those households that had never subscribed to Pay TV services, the main reason for not doing so was satisfaction with their current range of channels (40%). Less than one in four maintained that they were likely to subscribe to cable/MMDS or satellite services at some stage in the future.

As can be seen in Table 4.2, subscribers to Pay TV services have a higher representation in Dublin (42%), while non-subscribers tended to live in the Munster and Connaught/Ulster

⁵ Margin of error +/- 3.5%.

⁶ It should be noted however that subscriptions with cable/MMDS service providers have generally been in place for a much longer period than satellite subscriptions with 60% of satellite customers claiming to be satellite subscribers for less than two years.

regions (61%). This could be attributed, in part, to the limited availability of cable/MMDS services in these areas.

Table 4.2 Geographic breakdown of Pay TV usage

| | <i>Non-Subscriber to Pay TV (%)</i> | <i>Subscriber to Pay TV (%)</i> |
|-------------------------|-------------------------------------|---------------------------------|
| <i>Dublin</i> | 14 | 42 |
| <i>Rest of Leinster</i> | 25 | 23 |
| <i>Munster</i> | 31 | 26 |
| <i>Connaught/Ulster</i> | 30 | 9 |

When asked the reasons for their choice of service provider, over four in ten cable/MMDS subscribers believed that there was only one service option available with just over one in ten satellite subscribers giving this reason. Satellite subscribers mention football/sports channels (21%) and the wider range of channels in general (16%) as the key drivers.

4.3 Customer Satisfaction Levels

Approximately one in four cable/MMDS subscribers were dissatisfied with the efficiency and general level of customer service compared to one in ten satellite subscribers. Nearly half of cable/MMDS subscribers had complained in the past about some aspect of their service compared with one in four for satellite. However, it should be noted that subscriptions with cable/MMDS service providers have generally been in place for a much longer period than satellite subscriptions⁷ which may explain part of this divergence. Further, these previously under-invested cable/MMDS companies have come under new ownership in recent times and are currently undergoing substantial restructuring, upgrading of networks and investment in improved customer services. Outages/breakdown in the service was the aspect generating the most complaints for both cable/MMDS and Satellite, followed by picture/sound quality issues.

Nearly two thirds of all subscribers (64%) were unaware of who to complain to if they are dissatisfied with the response to a complaint while only three percent had ever approached a consumer body regarding a complaint with an operator. On 6 April 2001, ComReg established a framework governing the Codes of Conduct for the handling of consumer complaints by cable/MMDS operators⁸. Each code sets out the minimum level of service that a consumer can expect to receive from their operator. Operators should provide a copy of their code of conduct to any customer who requests a copy, as well as having it available on their website.

4.4 Switching Behaviour

Of the Pay TV subscribers that had switched service provider in the past two years (6%), the majority had switched to satellite. The key reasons given for switching service provider were the wider range of channels offered by the new provider or a particular problem with their previous provider.

Of those who had not switched service provider in the last two years, almost four in five (78%) 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.

⁷ Many satellite customers are recent subscribers – 60% claimed to be satellite subscribers for less than two years.

⁸ ComReg Document No. 01/22, D6/01 – Codes of Practice by cable and MMDS operators for handling consumer complaints - Decision Notice D6/01 and Response to the Consultation

4.5 Digital TV Service

One third of Pay TV households (33%) subscribe to digital TV services with a third of those subscribers having signed up within the past year. Approximately nine in ten digital subscribers subscribed to satellite digital services. Key factors given for subscribing to digital TV services were the wider range of channels (28%), football/sports channels (23%) and the good deal/special offer received (13%). Among the key reasons given why cable/MMDS subscribers had not upgraded to digital services included the cost of the digital service and satisfaction with their existing service. Overall, cable/MMDS companies are gaining small numbers of digital subscribers and are losing analogue subscribers.

5 Regulatory Developments

5.1 Fixed

5.1.1 Review of the Price Cap

The price cap⁹ is a key regulatory tool that is aimed at protecting consumers from excessive pricing in areas of the market where competition is ineffective or where there is a dominant operator. The current price cap (which came into force at the beginning of 2000) is set at CPI-8%. This means that *eircom* must reduce prices covered by the Price Cap (mainly local and national calls and line rental) in real terms by 8% in each year. In February ComReg issued a decision notice on the review of the current price cap as the final part to a procedure that involved three consultation papers during 2002.

In the Decision Notice *eircoms* pre-tax nominal cost of capital for regulatory purposes has been set at 11.5%. The price cap which came into force in February 2003 is set to exist for a period of three years. Carryover of unmade price increases from one price cap to the next will not be permitted except on a discretionary rather than automatic basis to diffuse concerns over the flexibility afforded to *eircom*. ComReg is of the view that the cap that is most likely to meet its objectives is CPI-0, which will allow average prices for the relevant basket of services to rise in line with inflation. ComReg has also decided to remove all sub-caps as it is confident that there already exist sufficient deterrents to anti-competitive practices. Finally, a lower-quartile cap of CPI-0 will remain in place until such time as a suitable alternative tariff scheme is available. This will also protect customers and competitors alike, until such time as an appropriately priced wholesale line rental product becomes available.

The Telecommunications Tariff Regulation Order (SI 393 of 1996) and the Telecommunications Tariff Regulation (Modification) Order, (SI 438 of 1999) were replaced by the new Telecommunications Tariff Regulation Order with effect from 4 February 2003. While this price cap review was carried out under existing Irish legislation, ComReg has taken note of the new Directives that relate to SMP, including any accompanying guidelines and recommendations with respect to the issues of market definition and assessment of dominance and thus does not expect there to be a conflict with the new EU Directives.

5.1.2 Implementation of Partial Private Circuits Pricing

Partial Private Circuits (PPCs) are a new wholesale product which enables operators to provide more competitively priced leased lines to end users, and therefore stimulate competition and encourage economic efficiency.

In order to facilitate the development of this product, ComReg issued a decision notice in December which directed *eircom* to submit to ComReg prices for the PPC product on 7th February 2003, prices for the PPC processes on 14th February 2003, and to finally offer the product from 15th February 2003¹⁰. On 18th February 2003, ComReg found that the *eircom* PPC prices were not compliant with previous ComReg directions. Therefore ComReg issued further directions to effectively 'lock-in' any commercial benefit to the

⁹ A price cap is defined in the Telecommunications (Miscellaneous Provisions) Act 1996, Section 7, as an overall limit on the price rises of one or more baskets of telecommunications services using the formula $(\Delta\text{CPI}-X)$ per cent, where ΔCPI means the annual percentage change in the Consumer Price Index and X means the adjustment specified by the Commission.

¹⁰ ComReg Document No. 02/110R – Implementation of Partial Private Circuits

Other Licensed Operators, which may be brought about by this product, back to the initial proposed product offer date¹¹.

5.1.3 Interconnect Rates

Irish operators currently enjoy some of the lowest interconnection rates in Europe (i.e. rates which telecom operators charge each other for using their networks).

A consultation paper was issued to seek the views of interested parties on the current regime of calculating interconnection rates and explores a number of alternatives-including the option of a wholesale price cap¹². In addition, it also addresses a number of issues underlying the calculation of interconnection rates.

ComReg outlined *eircom's* final Interconnection rates for the 12 month period from 1st April 2001 to 31st March 2002 in document 03/23¹³.

ComReg issued an information notice confirming the review and approval of proposed text changes to *eircom's* Reference Interconnect Offer, in line with the commitment to version control of *eircom's* RIO¹⁴. This information notice addressed *eircom's* changes from version 2.6 to 2.7, also from version 12 to 13 of the Switch Transit Routing and Price List and finally, the introduction of the Operator Price List.

5.1.4 Implementation of CPS Single Billing Products

The implementation of CPS Single Billing Products, such as Wholesale Line Rental, Agency rebilling and Wholesale Ancillary services means that customers currently availing of CPS can opt to receive a single bill for their telephony rental, calls and other ancillary services and should further facilitate the development of competition in the market.

Decision Notice D13/02 directed *eircom* to propose, by the end of September 2002, product descriptions for the above. However in light of the limited progress made to date, the amount time that has already passed and the complexity of the issues still to be addressed, *eircom* and OLOs have requested that the launch date for the products be revised. Decision notice D2/03¹⁵ sets a revised completion date of 30th April 2003 and also defines milestones for process development, negotiation of terms and conditions, submission of pricing elements and completion of testing.

In February 2003 ComReg published an Information Notice¹⁶ outlining its understanding of the relationship of introductory prices for the wholesale line rental product to retail line rental and how the price should evolve over time. The product will be priced at retail price for a line less 8.5% initially and this margin percentage will apply for the first year.

¹¹ ComReg Document No. 03/22 – Implementation of Partial Private Circuits Pricing

¹² ComReg Document No. 03/16 – Fixed Interconnect Charging Mechanisms

¹³ ComReg Document No. 03/23 – Interconnection Rates in the Irish Telecommunications Sector

¹⁴ ComReg Document No; 03/17 – RIO Text Change, Version 2.6 to 2.7, Version 12 to 13 of the STRPL and Introduction of Operator Price List

¹⁵ ComReg Document No. 03/07 – Implementation of CPS Single Billing Products – Wholesale Line Rental (SB-WLR), Agency Rebilling (SB-AR), Wholesale Ancillary Services (WAS).

¹⁶ ComReg Document No. 03/24 – Wholesale Line Rental – Pricing Issues

5.1.5 Flat Rate Internet Access Call Origination – (“FRIACO”)

The introduction of a wholesale flat rate Internet product will be of a considerable benefit for the future development of the Internet market in Ireland in addition to being of significant benefit to users. FRIACO (Flat Rate Internet Access Call Origination) product facilitates at a retail level the provision of “Flat Rate Internet Access” which enables both companies and residential users to have a competitive service which is available at a predictable cost.

Following requests from a number of operators in July 2002 for a FRIACO service, *eircom* engaged in a series of bi-lateral discussions until November 2002. To assist in expediting the process ComReg then established a special forum which further assisted in developing the product in line with that available in many other countries across Europe. However in view of increasing demands for a flat rate offering from consumers and because of a number of technical and commercial constraints ComReg have now intervened to formalise the definition of the product description and to set out a timetable for its introduction on a phased basis¹⁷.

In the Decision Notice¹⁸ ComReg set out a detailed timescale to be met by directing the introduction of Primary FRIACO on a phased basis, and by setting out the complete process for the development of inter-operator processes, terms and conditions and cost orientated pricing associated with the product.

In February 2003 ComReg issued a further Decision Notice¹⁹ welcoming the proposed product charges for the FRIACO service which are amongst the lowest within Europe. ComReg acknowledged that the proposed charges will be subject to a further review after six months during which time additional statistics will be available. In addition to the product charges, ComReg directed some process charges for the service also.

The detailed programme for the introduction of FRIACO enabled operators to be in a position to order Wholesale FRIACO by end of February 2003. This will facilitate the provision of a retail offering by operators no later than the end of June 2003

5.1.6 Local Loop Unbundling Code of Practice

ComReg and the industry are concluding a Code of Practice (COP) to govern the customer contact arrangements around Local Loop Unbundling (LLU). To date, all issues included in the COP were agreed upon except for one outstanding issue, the duration of the “no contact” period following unbundling of the loop. This is the date from which another provider can contact the customer for the purposes of, for example, winback. Until that date no contact apart from an anti slamming letter can be sent to the customer²⁰.

Under Article 4(3) of LLU Regulation, ComReg may intervene²¹ on its own initiative in order to ensure non-discrimination, fair competition, economic efficiency and maximum benefit for users. ComReg believes that as this issue remains unresolved and a resolution is not foreseeable in the ongoing negotiation process that intervention by ComReg, on its own initiative, is required to determine a fair “no-contact” time frame.

¹⁷ ComReg Document No. 02/122 – Implementation of Flat Rate Internet Access Call Origination

¹⁸ ComReg Document No. 03/02 – Decision Notice D1/03 Implementation of Flat Rate Internet Access Call Origination - FRIACO

¹⁹ ComReg Document No. 03/25 – Pricing of Flat Rate Internet Access Call Origination (“FRIACO”) Formalisation of Pricing of Wholesale FRIACO Product

²⁰ ComReg Document No. 03/11 – Own Initiative Investigation Final Determination – No. 01/03 Summary

²¹ Under Article 4 (3) of the LLU Regulation (Regulation 2887/2000 of the European Parliament and of the Council on unbundled access to the local loop)

The determination resulted in the following– The three month “no contact” period for residential customers as well as for business customers; the “no contact” period shall be reviewed by ComReg after six months; and finally now that this issue of the “no contact” duration has been directed upon and resolved the COP should be agreed, signed and published as appropriate on the *eircom* website. To date the COP has not been published on *eircom*’s website.

5.1.7 Future Delivery of Broadband

In January, ComReg published its Response to the Consultation on the Future Delivery of Broadband in Ireland²². Overall, a varied group of respondents submitted comments - from large and small users, to representatives of various regional groups, to both fixed and mobile operators. Many of the comments concentrated on low pricing as a key means of stimulating widespread take up of broadband services – a view shared by ComReg who noted that there appeared to be more than sufficient grounds for *eircom* to introduce a more reasonably priced product. Significant progress has since been made on this issue with *eircom*’s announcement of plans to reduce its DSL prices by over 50% by the end of March. However, as the report highlights cost is just one of the five ‘C’s that will be critical in driving broadband adoption and continued improvements in content, confidence, competition and convenience will also be key in encouraging widespread broadband take-up.

5.2 Mobile

5.2.1 Mobile Number Portability (MNP) Implementation Timescales

MNP is seen as a key enabler of competition in the mobile market which will enable Irish consumers to retain their existing mobile number if they decide to change operator.

The mobile operators had reported to ComReg that despite a concerted effort on behalf of the industry they would not be in a position to deliver a fully tested product until mid June 2003. The industry previously agreed a deadline of Q4 2002. This delay was attributed the complexity of the numerous system upgrades required to support MNP and to difficulties encountered in the commercial negotiations for the mobile number portability database. Noting its disappointment that the original timeframe had not been met ComReg issued a direction to the mobile operators requiring them to have completed a full commercial launch of MNP no later than 25th July 2003²³.

5.2.2 Extending Broadband Access within Licensed Radio Spectrum

The intention of this consultation paper is to extend the availability of broadband access to areas that might be beyond the reach of alternative platforms²⁴. As part of its commitment to extending broadband communications to the widest possible extent ComReg are seeking the views on this proposal which may allow mobile network operators to provide other broadband wireless services using part of their licensed radio spectrum, where this is not fully required for mobile services.

²² ComReg Document No. 03/08 – Future Delivery of Broadband in Ireland – Response to Consultation

²³ ComReg Document No. 03/03 – Mobile Number Portability Implementation Timescales

²⁴ ComReg Document No. 03/13 – Extending Broadband Access within Licensed Radio Spectrum

5.2.3 Mobile Gateway Usage

Mobile Gateways are typically used in the Irish marketplace to enable fixed telephony networks to connect directly to mobile networks via a mobile telephony radio link.

ComReg issued an information notice which outlines the potential usage of mobile gateways by end users or by telecom operators and presents the broad implications of their use in both situations²⁵. ComReg outlined that consumer and business usage of such gateways will be license exempt; however, operator usage of gateways as a form of interconnect is not acceptable and proper interconnection paths should be established in order to provide appropriate service quality levels to consumers and to meet licence conditions.

5.2.4 Code of Practice on Sharing of Radio Sites

The adoption of a Code of Practice on Sharing of Radio Sites²⁶, which was published by ComReg in March 2003, provides a common framework for sharing of and access to radio sites for all 3G mobile operators. The Code will also complement the site sharing commitments contained in the operators' licences. The framework will further facilitate sharing of existing structures thus reducing the pressure on 3G operators to acquire new sites.

The Code of Practice has been agreed and adopted by the three 3G licensees, O2, Vodafone and 3.

5.3 Radio Spectrum and Technology

5.3.1 Rights of Use of Radio Frequencies

ComReg is the national body responsible for the regulation of the telecommunications industry and is also the licensing authority for the use of civil radio spectrum in Ireland.

In December 2002 ComReg issued a Consultation²⁷ paper on radio spectrum use. This document is the latest in a series of consultations on the future framework for authorisations under the new EU Directives for electronic communications and services. Specifically, the implications of the Directives for the future regulation of the radio spectrum are addressed. In particular the consultation describes how the use of radio spectrum is currently regulated in Ireland, highlights the provisions of the new EU framework relating to the use of radio spectrum and consults on the impact of the new regime on the existing framework for licensing under the 1926 Wireless Telegraphy Act.

5.3.2 FWPMA Broadband Licenses

ComReg issued an information notice which set out the proposed amendments of FWPMA²⁸ Broadband licenses²⁹. The intention is to provide flexibility on these niche

²⁵ ComReg Document No. 03/15 - Mobile Gateway Usage – Clarification of the regulatory environment

²⁶ ComReg Document No. 03/28 – Code of Practice on Sharing of Radio Sites

²⁷ ComReg Document No. 02/115 - Future Regulation of Electronic Communications Networks and Services – Rights of Use of Radio Frequencies

²⁸ Fixed Wireless Point to Multipoint Access (FWPMA) – A system that connects subscribers to the Public Switched Telephone Network (PSTN) using radio signals for a substitute for copper wires for all or part of the connection between the subscriber and the switch.

technology licenses that would not change any element which was material to the tender criteria.

ComReg also outlined its intention to introduce a licensing scheme for Fixed Wireless Access in the 26GHz, 10.5GHz and 3.5GHz bands in 2003 to help with the provision of FWA services to Irish users³⁰. This scheme will operate per base station on a first come first served basis.

5.4 Numbering

5.4.1 Numbering Issues under the new EU Framework

In order to provide an overview of how the new regulatory framework will affect the regulation of numbering, on 13 January 2003 ComReg published an information notice³¹ to highlight the issues involved and to encourage discourse on how the new legislation might impact administration of the National Numbering Scheme. One of the main impacts identified in the paper is the obligation to open Irish non-geographic numbering resources to foreign access subject to the feasibility. There is uncertainty over the economic feasibility of such an undertaking so this will be reviewed by ComReg over the coming months. The various positions set out in the document are of course subject to change as firm conclusions can not be made until the final transposition of the Directives into Irish legislation has taken place.

5.4.2 National Numbering Conventions

The National Numbering Conventions are intended to provide a long-term framework within which the Irish telephone numbering scheme may continue to be developed, by agreement, for the benefit of all Irish public telecommunications users.

The first version of the National Numbering Conventions was published in February 2000 and this was followed by version 2 in December 2001. Version 3 of the National Numbering Conventions has now been published and will remain in operation until some time after the new European legislative framework (or the Irish transposition thereof) comes into force in July 2003. A consultation, followed by the publication of a new update will then take place during the second half of 2003 to take account of the new legislative framework, although Version 3 already includes appropriate anticipatory changes³².

Version 3 of the Conventions, proposed the introduction of changes or new text in respect of the following topics, as well as some more routine textual changes or improvements: mailbox numbers introduced in the fixed network, text messaging short codes, national signalling point codes (codes used for network signalling within Ireland between operator's switches), exclusion of over-length numbers, and the rewrite of the process for national number changes³³.

²⁹ ComReg Document No. 02/120 – Response to Proposals on FWPMA Broadband Licenses

³⁰ ComReg Document No. 02/121 – Proposed Amendments FWPMA Licenses

³¹ ComReg Document No. 03/05 - Future Regulation of Electronic Communications Networks and Services – Numbering Issues – Information Notice

³² ComReg Document No. 02/107 – National Numbering Conventions – Version 3.0 Reference Document

³³ ComReg Document No. 02/108 – Numbering Conventions – 2nd Revision

5.4.3 Review of Premium Rate Service Numbering Scheme

The Premium Rate Services (PRS) scheme uses numbers beginning with the access code 15XX. Calls to PRS cost more than ordinary telephone calls and each PRS prefix signifies a specific call cost. The per-minute rates are industry-agreed single price points that ComReg understands have not changed since the inception of the scheme. The current Premium Rate Services (PRS) numbering scheme has been in place for over 10 years.

During the quarter ComReg undertook a consultative review of the structure of the Premium Rate Services Numbering Scheme³⁴ in response to proposals from service providers and operators. The proposals put forward in the paper aim to allow more flexibility to adjust service prices in line with prevailing market conditions and to ensure that maximum transparency is provided to users. ComReg has proposed introducing new pay-per-call products (where the price of the call is independent of the duration of the call) in addition to pay per minute. Another of ComReg's pricing proposals is based on price bands, where lower and/or upper price limits would be set for a particular access code, within which prices can be set for individual services on a particular number.

5.5 EU Framework

5.5.1 General Authorisation Conditions under the new EU Framework

On 25 July 2003 the legal basis for the provision of electronic communications networks and services will change throughout the European Union as a new family of Directives are due to be implemented. Two significant changes to the regulatory framework will result. Firstly all electronic communications networks and services will be subject to common rules, and secondly licences to provide relevant networks and services will be replaced by an authorisation regime. Anyone will be able to avail of a "general authorisation" to provide a network or service provided they conform to certain general conditions.

On 16 August 2002, the ComReg issued a consultation paper³⁵ on the future framework for authorisations under the new EU Directives for electronic communications networks and services. On 19 December 2002, ComReg published a response to this consultation³⁶ which briefly reports on the views respondents have given, presents ComReg's position on the various issues and documents the actions which ComReg is taking or intends to take as a result of this consultation. The paper sets out the circumstances in which individual general conditions will apply to particular categories of networks and services. The paper also clarifies that only providers of services to third parties and operators of networks used to supply services to third parties will be subject to a notification requirement.

³⁴ ComReg Document No. 03/27 – Review of the Premium Rate Services Numbering Scheme - Consultation

³⁵ ComReg Document No. 02/72 - Future Regulation of Electronic Communications Networks and Services - General Authorisation Conditions – Consultation Paper

³⁶ ComReg Document No. 02/114 - Future Regulation of Electronic Communications Networks and Services - General Authorisation Conditions – Response to Consultation

5.5.2 Future Regulation of Electronic Communications Networks and Services

Since the texts of the new EU Directives were agreed early in 2002, ComReg has continued its work on analysing the requirements of the Directives and issued a number of public documents to provide clarity on how the provisions would operate.

In January 2003 ComReg welcomed the opportunity to provide its comments to the Department of Communications, Marine and Natural Resources on the proposed instruments to transpose the Directives into national legislation. ComReg gave substantial comments on headline issues such as enforcement, appeals and spectrum rights of use along with more minor issues concerning drafting³⁷. The Department of Communications, Marine and Natural Resources is currently drafting the transposing legislation to give effect to the new framework.

5.5.3 Cooperation Agreement with the Competition Authority

Pursuant to Section 34 of the Competition Act, 2002, ComReg has concluded a co-operation agreement with the Competition Authority³⁸. The purpose of this agreement is to facilitate co-operation, avoid duplication and ensure consistency between the actions of ComReg and the Competition Authority.

5.5.4 Information Notice on Market Analysis and Data Collection for Market Reviews

In accordance with the new EU Regulatory Framework, ComReg must perform market reviews in order to identify electronic communication markets that may be susceptible to ex-ante regulation. The new Framework is due to be implemented on 25 July 2003 and on 19 December 2002 ComReg issued an information notice³⁹ outlining its approach to this market review process.

This document outlines in detail the market definition procedure and its market data requirements, the market analysis procedure and its market data requirements and finally the actual process of collecting the market data. Following the identification of data needs ComReg, on 18 February, issued appropriate proportionate questionnaires to operators. As part of this process ComReg has held two industry workshops to promote transparency and discourse and will be holding ongoing consultation with industry, including further workshops and interviews with operators.

On return of questionnaires ComReg will firstly define markets along the lines of Competition Law and subsequently perform market analyses⁴⁰ to assess the level of effective competition.

³⁷ ComReg Document No. 03/12 – Future Regulation of Electronic Communications Networks and Services – ComReg submission in connection with Department of Communications, Marine and Natural Resources consultation on draft legislation

³⁸ ComReg Document No. 03/06 – Cooperation Agreement with the Competition Authority

³⁹ ComReg Document No. 02/117 - Information notice on market analysis and data collection for market reviews of electronic communications networks

⁴⁰ As a guide for NRAs the Commission has published a Recommendation on relevant markets that may be susceptible to ex-ante regulation.

5.6 Response to Ministerial Direction

In January ComReg published its response to Minister Ahern's recent draft Policy Direction⁴¹. The draft Policy Direction, issued to ComReg in December 2002, offers a general overview of Government policy in both the telecommunications and postal sectors and highlights a number of key policy priorities for ComReg over the short to medium term.

In its response ComReg submitted comments and outlined recent progress within these policy areas, including continuing advancements on the introduction of a flat rate Internet access product. ComReg noted the challenging nature of the Government's goals as set out in the draft Policy Direction, but stated that it was ComReg's belief that such ambitions were necessary if Ireland was to achieve its key economic objective of becoming a leading knowledge economy.

In February the Minister issued finalised version of his Policy Direction. This requested ComReg to make use of its powers as appropriate to facilitate the introduction of a flat-rate Internet product and to provide the Minister with monthly progress reports on this matter until such time as retail services are introduced. In addition, the Minister also directed ComReg in carrying out its functions to have regard to Government policy in a number of areas, including amongst others: broadband roll-outs; the development of North-South infrastructural links; the objectives in the Government's Programme for regional development; and Government objectives relating to electronic communication networks as set out in Government policy regarding Research, Development and Innovation.

The Minister also directed ComReg to ensure that best practice regulatory procedures are adopted, including the imposition of regulation only when justified, the need to ensure the cost of regulation is minimized and the assessment of the impact of regulatory decisions before they are imposed. The Policy Direction also outlined the need to ensure consistency with other member states together with the need for assuring industry stability.

ComReg notes that its role as regulator is to facilitate development and that there are many players involved in achieving key results. ComReg will continue to work towards these goals and hopes that they can be achieved with the full co-operation and commitment of the Government, the industry and end-users."

5.7 Statutory Instruments

5.7.1 Adopted by the Minister

5.7.1.1 European Communities Regulations 2003, S.I. 80 of 2003

S.I. No. 80 of 2003 adopted by the Minister transposes Articles 5 (1), 15 (3) and 16 (1) of the Framework Directive which enables ComReg to request undertakings providing electronic communications networks or services to provide ComReg with all information necessary to undertake a market definition and analysis process.

5.7.1.2 European Communities (Postal Services) Regulations 2002, S.I. 616 of 2002

The European Communities (Postal Services) Regulations 2002, S.I. 616 of 2002 adopted by the Minister transposed the amending European Postal Services Directive No. 2002/39/EC into National law on 19 December 2002, thereby revoking the European Communities (Postal Services) Regulations 2000, S.I. 310 of 2000.

⁴¹ ComReg Document No. 03/04 – ComReg Response to Draft Ministerial Direction of 2/12/2002

5.7.2 Adopted by ComReg

5.7.2.1 Wireless Telegraphy Regulations 2003, S.I. 79 of 2003

S.I. No. 79 of 2003 provides for the issue of licences for apparatus under the Wireless Telegraphy Act 1926 namely licences for apparatus used in the provision of base station specific local area Fixed Wireless Access.

5.7.2.2 Telecommunications Tariff Regulation Order 2003, S.I. 31 of 2003

S.I. No. 31 of 2003 removes the price cap on the lower quartile bill but this is conditional on the introduction of a vulnerable or light user scheme approved by ComReg. The order also removes the sub-caps contained in previous orders. In addition the order provides that the price cap on certain services provided by eircom must not exceed an amount equal to the annual change in the Consumer Price Index – 0%. The order removes directory enquiry calls from the basket of telecommunications services previously covered by the price cap and introduces fixed to mobile calls into the basket. The order also provides for various matters measuring compliance.

6 Consumer Focus

6.1 Consumer Complaints

ComReg has an established framework on the Codes of Conduct for the handling of complaints by cable and MMDS operators⁴² and a similar framework for telecommunications operators⁴³.

The majority of complaints received during Q4 for the fixed telecommunication sector related to installation and repair, in particular, delays and missed appointments. As was the case in Q3, most complaints in the broadcasting area were customer service issues, including long call hold times, missed service appointments and lack of feedback from the service provider to their customers. In the Mobile sector, the most common complaints related to billing disputes.

Table 6.1 Consumer Complaints

| <i>Complaints</i> | <i>Q04</i> | <i>Q03</i> |
|--|------------|------------|
| <i>Fixed Telecommunications Operators</i> | 178 | 133 |
| <i>Mobile Telecommunications Operators</i> | 27 | 35 |
| <i>Broadcasting</i> | 95 | 127 |

Most queries received during the quarter related to operators' policies, for example, in relation to customer service, credit control and disconnection. Queries on phone based CPS subscription processes; mobile spamming and number portability were also received. Table 5.2 below illustrates the volume of queries received this quarter compared to last quarter.

Table 6.2 Consumer Queries

| | <i>Q04</i> | <i>Q03</i> |
|----------------|------------|------------|
| <i>Queries</i> | 651 | 433 |

6.1.1 The Future Regulation Framework for the Regulation of Universal Service in the Irish Market

The Universal Service regime currently provides that every person in Ireland can reasonably expect to receive a basic set of telecommunications services no matter where they live and at an affordable price. For example, a basic telephone line, directory enquiry services and public payphones. At present the requirement to provide these services is placed on *eircom*.

The Department of Communications, Marine and Natural Resources has issued a consultation on draft legislation which transposes the Universal Service Directive, in particular, the "European Communities (Electronic Communications) (Universal Service

⁴² Codes of Practice by cable and MMDS operators for handling consumer complaints – Decision Notice D6/01 and response to the consultation – ODTR doc 01/22

⁴³ Codes of Practice for the handling of consumer complaints by telecommunications operators – Decision Notice D13/01 – ODTR doc 01/67

and Users' Rights) Regulations 2002". The regulations deal with measures concerning the provision of Universal Service and the protection of end users.

As ComReg has responsibility for deciding on the scope of the Universal Service Obligations and designating the Universal Service Provider(s) a preliminary consultation process was initiated in December 2002⁴⁴. This initial consultation document deals with the elements of the new Universal Service Regulations which will lead to the placing of obligations on operator(s) designated as the Universal Service Provider.

A further consultation has been issued to deal with other aspects of the regulations concerning the interests of protecting end users.

6.2 ComReg's approach to Consumer Issues in the Irish Communications Sector

ComReg's consumer policy operates within the framework set out in national and EU legislation. In light of recent changes in national legislation (The Communications Act 2002) and newly adopted EU legislation (Universal Service Directive) that will be transposed into Irish Law, ComReg's consumer role is set to evolve over the coming year.

ComReg published an Information Notice⁴⁵ in February 2003 which:

- Set out a general policy framework around ComReg's current consumer role
- Highlights a number of the key initiatives ComReg has implemented in this area
- Outlined the main areas which will be impacted as a result of upcoming legislative changes
- Outlined the primary objectives of ComReg's consumer role

The new framework places greater emphasis on the role of regulators in protecting consumers and providing them with information. The initial focus of ComReg's future consumer work programme will be to implement the measures outlined in the new framework in a timely fashion and to further increase its awareness raising role.

6.3 Protecting Users in a Developing Communications Market Implementing Measures under the National and EU Communications Framework

One of the functions of ComReg is to promote the interests of users. For example, ensuring that all users have access to a universal service, ensuring that consumers are afforded a high level of protection in dealing with communications suppliers and promoting the provision of clear information.

In December 2002 ComReg issued the first consultation based on the designation of Universal Service under the recently adopted EU Directive on Universal Service and End Users' Rights. In February 2003 a second consultation process was initiated⁴⁶ to deal with those elements of the Directive dealing with User Rights, including consumer contracts,

⁴⁴ ODTR Document No. 02/116 - The Future Framework for the Regulation of Universal Service in the Irish Market

⁴⁵ ComReg Document No. 03/20 – ComReg's approach to consumer issues in the Irish communications market

⁴⁶ ComReg Document No. 03/26 – Protecting Users in a Developing Communications Market Implementing Measures under the National and EU Communications Framework

transparency of information, consumer rights with respect to operator assistance and resolution of complaints by ComReg.

ComReg intends to utilise this consultation to focus the issues and to publish a report which will make decisions in key areas and set out a future timetable for dealing with individual regulatory measures.

6.4 Consumer Guides

Under the Communications Act 2002 ComReg has specific objectives in relation to consumers. As well as maximising consumer welfare and protecting consumers, ComReg's consumer policy also seeks to raise awareness. This objective aims to provide consumers with information to allow them to make informed choices in the market, thereby contributing to the development of competition.

In January 2003 ComReg published two consumer guides. The first "Telephony Services – Exercise your Choice"⁴⁷ provides guidelines on how to go about choosing an alternative supplier for fixed services. The second guide "Controlling the cost when using your Irish Mobile Phone Abroad"⁴⁸ provides some general guidelines on how to reduce mobile roaming costs.

⁴⁷ <http://www.comreg.ie/fileupload/publications/cg01a.pdf>

⁴⁸ <http://www.comreg.ie/fileupload/publications/cg02a.pdf>

7 Technology Developments

A key aspect of ComReg's role is to raise awareness of new and emerging telecommunications technologies in the ICT sector. To this end, two Briefing Notes were published as part of the Forward-looking Programme during this quarter; Future Digital Subscriber Line (DSL) Technology and Voice over Internet Protocol (VoIP). Both of these notes were prepared to follow-up on the 'Innovation in Communications – Planning for the Future' symposium held by the ODTR in June 2002.

The first of these Briefing Notes is on the topic of Future DSL Technology. DSL is a method of increasing the bandwidth or information-carrying capacity of existing copper telephone lines in the 'last mile' or local loop segment between customers and local exchanges, enabling the delivery of a type of always-on, broadband access. DSL is one of the key technologies for delivering broadband services in Ireland. Technology developments that will enable further increases in data rates or the distance over which the services can operate are outlined in this briefing note (e.g. VDSL⁴⁹). New equipment designed for smaller scale implementations known as mini DSLAM⁵⁰s or 'pizza boxes' could be one of the most promising developments outlined in the briefing note.

The second Briefing Note covers the topic of Voice over Internet Protocol (VoIP). VoIP, also known as IP telephony, is a technique that allows telecommunications network operators to carry voice services using IP networks, including the Internet, instead of traditional circuit switched networks. The advantages of this include increased efficiencies in operational costs which arise as a result of the combination of voice and data onto a single network. Furthermore, the use of IP technology enables further development of new value added voice services such as unified messaging (UM) and greater integration with Internet and e-Commerce applications. VoIP is part of a general migration of telecommunications services from circuit switched to packet based (e.g. IP) technologies, which could help bring about further convergence between different types of services (e.g. voice, video, data). In Ireland, VoIP has already been implemented in a number of private networks allowing companies to use their private data networks for voice services also.

⁴⁹ Very high data rate DSL (VDSL)

⁵⁰ DSL Access Multiplexer (DSLAM)

8 Postal Regulation

8.1 International Outbound Tariff Response to Consultation

On 17 December ComReg issued a response to the international outbound tariff consultation⁵¹ that concurred with price increases for international mail to Britain and Europe and decreases to the Rest of the World. The proposal introduced format based pricing that sees a single tariff for packets up to 100g to Europe and Rest of the World. The move away from geographic pricing sees uniform tariff to Europe and the Rest of the World whilst flagging that the tariffs to Britain will be addressed in subsequent phases. An indication was given that ComReg will consult on a direction to An Post to renegotiate its postal agreements with other countries as they are not currently geared to cost.

8.2 Investigation into SDS Parcel Prices Consultation

On 17 December ComReg issued a consultation paper⁵² inviting interested parties to make submissions by mid February outlining specific issues they would like to bring to our attention in connection with the proposed price investigation into the SDS services within the Universal Service Obligation. The aim of the proposed investigation is to establish whether there is compliance with the Tariff Principles (Regulation 10 of the EC Postal Services Regulation, 2000) and if necessary to agree with An Post a programme to remedy any deficiencies. A response will be issued in the second quarter of 2003, following completion of the price investigation

8.3 Universal Service Obligations Consultation

On 18 December the deadline for receipt of responses to the universal service obligation consultation was extended to 31 January 2003⁵³. ComReg is currently analysing the responses received and will make its decision, taking the views and the strength of arguments submitted by respondents into account. It is expected that this exercise will be completed in the near future and a Report on the Consultation will be published.

ComReg proposes to issue a short summary of the position taken in reaching its decision regarding the Direction to be given to An Post. The Direction will set out the obligations which An Post must adhere to as designated universal postal service provider for Ireland. It will then fall within ComReg's remit to monitor An Post's compliance with all the elements of the issued Direction.

8.4 Interim Quality of Service Target set for 2003

On 23 December ComReg announced that the interim target for the next day nationwide delivery of single piece priority mail during 2003 would be set at 94%⁵⁴. An Post is to provide details to ComReg by 28 February 2003 of the measures that will have to undertake to achieve the set target.

⁵¹ ComReg Document No. D18/02, 02/111 - Application by An Post to Increase the Price of International Outbound Reserved Postal Services – Decision Notice and Response to Consultation

⁵² ComReg Document No. 02/112 - Investigation into SDS Parcel Prices – Consultation Paper

⁵³ ComReg Document No. 02/113 - Notification of extension to deadline for comments on: Regulation of Postal Services - Universal Service Obligation, Tariff Principles and miscellaneous issues, ODTR No. 02/95

⁵⁴ ComReg Document No. D19/02, 02/119 - Quality of Service Standards for An Post – Setting an Interim Standard for 2003 – Decision Notice and Further Response to Consultation

8.5 Oireachtas Joint Committee on Communications Marine and Natural Resources

ComReg was invited to present to the Select Committee on 29 January an outline of the role and functions of ComReg, current postal issues followed by a question and answer session⁵⁵. The main postal issues raised were the financial state of An Post, the universal service obligation, tariff increases and REIMS, the international settlements system used by postal operators.

⁵⁵ ComReg Document No. 03/09 - Oireachtas Joint Committee on Communications , Marine and Natural Resources
Address by Etain Doyle, Chairperson, Commission for Communications Regulation, 29 January 2003

Appendix: Documents Issued December '02 – March '03

Fixed

| <i>Document No.</i> | <i>Title</i> |
|---------------------|--|
| 02/110 | Decision Notice D17/02 Implementation of Partial Private Circuits |
| 02/122 | Implementation of Flat Rate Internet Access Call Origination – FRIACO |
| 03/02 | Decision Notice D1/03 – Implementation of Flat Rate Internet Access Call Origination – FRIACO |
| 03/07 | D2/03: Implementation of CPS Single Billing Products: Wholesale Line Rental (SB-WLR), Agency Rebilling (SB-AR), Wholesale Ancillary Services (WAS): Decision Notice |
| 03/11 | Summary of the final determination of the Commission for Communications Regulation (ComReg) own initiative investigation regarding the “No Contact Period” associated with Local Loop Unbundling (LLU) |
| 03/14 | Decision Notice D3/03 – Review of the Price Cap on Certain Telecommunications Services |
| 03/16 | Consultation Paper on Fixed Interconnection Charging Mechanisms |
| 03/17 | RIO Text Change, Version 2.6 to 2.7, Version 12 to 13 of the STRPL, and Introduction of Operator Price List |
| 03/22 | Implementation of Partial Private Circuits Pricing |
| 03/23 | Interconnection Rates in the Irish Telecommunications Sector – Final Rates to Apply from 1 April 2001 to 30 September 2001 & 1 October 2001 to 31 March 2002 |
| 03/25 | Pricing of Flat Rate Internet Access Call Origination – (“FRIACO”) Formalisation of Pricing of Wholesale FRIACO product |

Consumer Issues

| <i>Document No.</i> | <i>Title</i> |
|---------------------|--|
| 02/116 | The Future Framework for the Regulation of Universal Service in the Irish Market |
| 03/20 | ComReg’s approach to consumer issues in the Irish communications market |
| 03/26 | Protecting Users in a Developing Communications Market Implementing Measures under the National and EU Communications Framework |

Post

| <i>Document No.</i> | <i>Title</i> |
|---------------------|--|
| 02/111 | Decision Notice & Response to Consultation – Application by An Post to increase the price of International Outbound reserved Postal Services |

| | |
|--------|---|
| 02/112 | Consultation Paper – Investigation into SDS Parcel Prices |
| 02/113 | Notification of extension to deadline for comments on: Regulation of Postal Services – Universal Service Obligation, Tariff Principles and miscellaneous issues, ODTR No. 02/95 |
| 02/119 | Quality of Service Standards for An Post |
| 03/10 | Chairpersons presentation to the Oireachtas Joint Committee meeting re An Post |

Radio Spectrum/Technology

| <i>Document No.</i> | <i>Title</i> |
|---------------------|---|
| 02/120 | Response to proposals on FWPMA Broadband Licences |
| 02/121 | Proposed Amendments FWPMA Licences |
| 02/123 | Part 5 General Telecommunications Licence (FWPMA Narrowband) – Chorus Communications Ltd. |
| 03/01 | Future Digital Subscriber Line (DSL) Technology – Briefing Note |
| 03/13 | Convergence of Mobile and Fixed Technologies: Extending Broadband Access within Licensed GSM Radio Spectrum |
| 03/18 | Proposed Amendments to the <i>eircom</i> Ltd. FWPMA Narrowband Licence |
| 03/19 | Part 5 General Telecommunications Licence (FWPMA Narrowband) – <i>eircom</i> Ltd. |
| 03/21 | Voice over Internet Protocol (VoIP) |

Numbering

| <i>Document No.</i> | <i>Title</i> |
|---------------------|---|
| 02/107 | National Numbering Conventions – (Version 3.0) – Reference Document |
| 02/108 | Response to Consultation on National Numbering Conventions |
| 03/03 | Mobile Number Portability – Implementation Timescale |
| 03/05 | Future Regulation of Electronic Communications Networks and Services – Numbering Issues |
| 03/27 | Review of Premium Rate Services Numbering Scheme - Consultation |

General

| <i>Document No.</i> | <i>Title</i> |
|---------------------|---|
| 02/109 | Chairperson’s Speech – ECTA Conference 11 th December 2002 |
| 02/114 | Future Regulation of Electronic Communications Networks and Services – General Authorisation Conditions |
| 02/115 | Future Regulation of Electronic Communications Networks and Services |

| | |
|--------|--|
| 02/117 | ComReg Information Notice on Market Analysis and Data Collection for Market Reviews of Electronic Communications Networks |
| 03/04 | ComReg Response to Draft Ministerial Direction of 2/12/2002 |
| 03/06 | Cooperation Agreement with the Competition Authority |
| 03/08 | Future Delivery of Broadband in Ireland: Responses to Consultation |
| 03/09 | Oireachtas Joint Committee on Communications, Marine and Natural Resources Address by Etain Doyle, Chairperson, Commission for Communications Regulation, 29 January 2003 |
| 03/12 | Future Regulation of Electronic Communications Networks and Services – ComReg submission in connection with Department of Communications, Marine and Natural Resources consultation on draft legislation |

Mobile

| <i>Document No.</i> | <i>Title</i> |
|---------------------|--|
| 03/15 | Mobile Gateway usage – clarification of the regulatory environment |
| 03/28 | Code of Practice on Sharing of Radio Sites |