ComReg seeks your views on

Measures to support equivalent access to and choice of Electronic Communications Services (ECS) for people with Disabilities

A summary of Call for Inputs

Legal Disclaimer

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1 Executive Summary

1   One objective of the legal framework is to ensure equivalent access to and choice of ECS for people with disabilities. The Commission for Communications Regulation (ComReg) is responsible for placing any relevant obligations on providers of ECS to ensure that end-users with disabilities have access to ECS "equivalent to that enjoyed by the majority of end-users" (equivalent access to and choice of ECS).

2   In 2014 and 2015, ComReg put in place specific measures to meet the needs of consumers with disabilities to choose and use ECS with confidence. These measures assist in ensuring that consumers with disabilities benefit from easy access to and the choice of ECS providers and services available to those who don't have disabilities.

3   We are reviewing the effectiveness of the measures that are in place and how they meet the needs of end-users with disabilities when accessing and using ECS. As part of this review, we published on the 1 September 2023 a preliminary consultation paper known as a 'Call for Inputs' (Consultation Document 23/80).

4   This Call for Inputs presents our current observations on the functioning of the measures in place. This is based on our ongoing engagement with stakeholders, including, industry, user groups, groups representing people with disabilities and consumers. We consider both market and technical developments as well as new requirements of the legal framework.

5   There are twenty-two questions posed in the Call for Inputs, and these are repeated in this summary document (Call for Inputs Summary ComReg Document No.23/80a) from pages 15 to 22. There are questions posed to address each of the specific measures. These consultation questions are compiled in Annex 1 below. ComReg would welcome views on any or all of the consultation questions and any relevant matters.

6   Responses to this consultation (the Call for Inputs (Consultation document 23/80) and this summary document (23/80a)) are due on or before 27 October 2023. This Call for Inputs Summary document and videos in ISL explaining the summary document are available on ComReg's website (comreg.ie)[1]. Please refer to Section 5 (Submitting Comments) below for further details on submitting a response to this consultation.

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[1] See Executive Summary and ComReg seeks your views on measures and Review of measures and consultation questions and Submitting comments .

2 Who is ComReg?

7   ComReg is the statutory body responsible for the regulation of the electronic communications sector and the postal sector in Ireland. The areas we regulate include:

- telecommunications (this means electronic communications services (ECS) and networks) and includes:

     o a fixed-line telephone service

     o a mobile phone service

     o a broadband service

- radio communications and broadcasting transmission, and

- the postal sector.

8   We operate under Irish and EU Legislation in these areas. We are responsible for:

- facilitating competition in these sectors, and

- protecting consumers, and

- encouraging innovation

9   We deal with complex issues of law, economics, and technology. We make sure we make our decisions fairly and clearly explain them. We want to offer a high-level of protection to consumers, including consumers with disabilities. This includes:

- dealing with suppliers,

- making sure information is clear, and

- addressing the needs of specific social groups, in particular people with disabilities.

10   We want to make sure you can choose and use electronic communications services (ECS) with confidence. In this context, ECS means:

- a fixed-line telephone service,

- a mobile phone service,

- a broadband service.

11 ECS can also include:

- a service to make and receive calls (telephone service or voice service), or

- broadband services like VoIP (also known as voice calls over broadband), where you have access to telephone-like services through your broadband provider. These services can be accessed through:

  o a home landline telephone,

  o a broadband connection, or

  o a mobile phone.

12 The general consumer [protections](#)[2] place protect consumer interests. Consumer Protection involves setting rules to ensure that consumers including those with disabilities, can have easy and equivalent access to ECS and that they are armed with the information they need to engage with the market with confidence.   These protections support all consumers, including those with disabilities, to choose and use ECS with confidence.

13 In addition, we introduced specific measures in 2014 and 2015 to assist in ensuring that people with disabilities have the same support to access and choose ECS the same as those who don't have disabilities.

14 We want to make sure that service providers of ECS or networks offer people with disabilities a service "**equivalent to that enjoyed by the majority of end-users**". This means that people with disabilities should have the same access to and choice of ECS as people without a disability, while being mindful principle of proportionality.[3]

15 Access to ECS should be the same for people with disabilities as it is for people who don't have disabilities. Everyone should have easy and equivalent access to ECS services and related information.   For example, people with disabilities should benefit from the same usability of ECS and related information as other users of those services, even if the way they use these services differs. That is what we mean by the word 'equivalence' in this context.

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[2] General consumer protections https://www.comreg.ie/advice-information/
[3] ComReg, in carrying out regulatory tasks must take all reasonable measures which are necessary and proportionate to achieve the objectives.

The Measures

ComReg has imposed specific measures on service providers under the legal framework. The measures were put in place by ComReg in 2014 and 2015. These measures assist in ensuring that consumers with disabilities benefit from easy access to ECS providers and services in the same way as it is for those who don't have disabilities. The details of these measures are fully set out in three ComReg decision documents:

- Electronic Communications:- [Measures to Ensure Equivalence of Access and Choice for Disabled End-Users](#)[4]

- Measures for Disabled End-Users: [Requirement for an Accessibility Statement](#) [5]

- Provision of [Access to a Text Relay Service](#)[6]

16   These specific consumer protections for end users with disabilities together are the measures (the Measures).

17   These Measures assist in ensuring ECS services and information are accessible to all including those with disabilities. In 2014 and 2015, we carried out a number of public consultations, with the aim of ensuring people with disabilities benefit from the easy and equivalent access to and choice of ECS the same as most people.   Following these consultations, we identified the following specific services and requirements in relation to information (the Measures) as necessary and appropriate to assist in insuring people with disabilities do not face barriers to making full use of their ECS service and information;

a.   Accessible complaints procedure,

b.   Accessible top-up facility for pre-paid mobile telephone users,

c.   Accessible directory enquiries,

d.   Accessible billing,

e.   Accessible facility to test compatibility of terminal equipment[7] or appropriate returns policy,

f.   Facility for disabled subscribers to register requirements,

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[4] ComReg Decision D04/14, ComReg document 14/52.
[5] ComReg Decision D06/15, ComReg document 15/98.
[6] ComReg Decision D09/15, ComReg document 15/143
[7] Terminal equipment in the case of this measure is a mobile phone.

    g. Provision of text relay service (TRS),

    h. Accessible information,

    i. Requirement for an accessibility statement.

18   We discuss the Measures in more detail in Section 4.

19   You will find a series of videos on our website summarising these service provider accessibility requirements.

3 What is this consultation about?

20 We are reviewing the effectiveness of the Measures we summarise in paragraph 17 above. The Measures are discussed in more detail in Section 4, page 12. We want to:

- check if these Measures meet the needs of people with disabilities when choosing, accessing and using ECS, engaging with their service provider, and throughout the consumer journey, and

- assess whether people with disabilities are adequately protected.

21 In the time since the Measures have been implemented, the following has happened:

- The electronic communications sector has continued to evolve in terms of market and technological advance ,

- The European Electronic Communications Code[8] (EECC or the Code) brought a change to the legal framework governing ECS and ECN,

- The Department of Environment, Climate and Communications published the Electronic Communications Code Regulations 2022[9] (the ECC Regulations). This means that these regulations are part of our national law in Ireland from 9 June 2023. The objective of the ECC Regulations is to ensure equivalent access and choice of ECS and ECN for people with disabilities.

22 Well-functioning markets should maximise benefits for consumers, ensuring that everyone, including people with disabilities, has equivalent access to ECS in terms of choice, price and quality.

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[8] S.I. No. 444 of 2022 EUROPEAN UNION (ELECTRONIC COMMUNICATIONS CODE) REGULATION 2022 pdf (irishstatutebook.ie). 2018 establishing the European Electronic Communications Code (Recast) ("The Code").

[9] S.I. No. 444/2022 - European Union (Electronic Communications Code) Regulations 2022 https://www.irishstatutebook.ie/eli/2022/si/444/made/en/print.

23 As stated above, we consider that the existing general consumer protection rules, and new consumer protections in place under legal framework, will help protect consumers, including those with disabilities, to choose and use electronic communications services with confidence.

24 We know that sometimes people with disabilities may need extra support to effectively access and use electronic communications services, including customer service. We have taken Measures, as set out at paragraph 17 above and, in more detail in Section 4, to support people with disabilities in their access and use of ECS and related information. Service Providers must ensure that the specific accessible services and information at paragraph 17 are available to end-users with disabilities and information as regards accessible services and information is published in the Accessibility Statement, as set out in the Call for Inputs.

25 The Measures we put in place aim to make sure that people with disabilities:

   - enjoy the same level of access and use of ECS as most people and

   - help them avoid obstacles to full access to and use of ECS.

26 This summary document refers to Chapter 4 of the Call for Inputs (Doc Number) which presents our current observations on how well existing Measures are working. We based our observations on our ongoing engagement with stakeholders, including:

   - industry,

   - user groups,

   - groups representing people with disabilities,

   - consumers, and

   - other regulators.

27 In compiling the Call for Inputs, we reviewed any relevant issues as regards the Measures including looking at:

   - the legal basis,

   - inputs from our Forum,[10] and

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[10] The Equivalence of Access and Choice Forum is facilitated by ComReg to discuss and progress ECS issues relevant stakeholders (representative groups of people with disabilities, industry, and other specialist experts).

- a published report by the Body of European Regulators for Electronic Communications[11] around equivalence and choice of ECS.

28 Through our Call for Inputs we are looking for input from people with disabilities on:

- their experience of ECS,

- their experience of the specific services and support available to them, as set out at paragraph 17 above,

- their experience when choosing and using ECS,

- how they engage with their service provider, and

- their consumer journey.

29 We believe that it is important to reflect on the Measures to make sure access and choice for people with disabilities is the same as for most people. We take into account both market and technical developments as well as new requirements of the legal framework.

30 With respect to equivalent access to and choice of ECS, as set out in the Call for Inputs (23/80), the review of the Measures may identify:

(a) potential improvements to the existing specific services and support available to people with disabilities and/or,

(b) possible new specific services/information may be necessary and appropriate, and

(c) that the needs of people with disabilities (as regards choosing and using ECS) are being met by technological developments and the market. In this case, some or all of the existing specific services and supports for people with disabilities may no longer be necessary to ensure equivalent access and choice of ECS and the extra services or support under the Measures could be withdrawn.

31 There are twenty-two questions posed in the Call for Inputs, we would welcome responses to some or all the questions. Annex 1 compiles these questions. There are two questions posed to address each of the Measures, as follows:

- Are these Measures needed to ensure equivalent access to and choice of ECS and related information?

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[11] BEREC is composed of the of the European Union (EU) member's states in addition to the members of the European Economic Area (EEA).

- Are there changes which should be made to these Measures?

32 The Call for Inputs (23/80) is one of a number of data-gathering methods we are using to gather relevant information to be considered when forming the basis for any future consultation(s) or publication.

33 The Call for Inputs (23/80) proceeds as follows:

Chapter 2 Introduction and background to the Measures, the statutory and regulatory framework and overview of the inputs to the Call for Inputs.

Chapter 3 Outlines the trends and developments that may impact outcomes for end-users with disabilities as regards access and choice of ECS;

Chapter 4 A review of the Measures (specific services and support in place for end-users with disabilities);

Chapter 5 Sets out the process for submitting comments to the Call for Inputs:

Annexes.

4 Ensuring equivalent access to and choice for people with disabilities

34 We believe that the existing general consumer protection rules, and new consumer protections under our legal framework, will help protect consumers, including consumers with disabilities.

35 In addition, as set out at paragraph 17 above, the following Measures are in place and available to people with disabilities:

   a. Accessible complaints procedure

   b. Accessible top-up facility for pre-paid mobile telephone users

   c. Accessible directory enquiries

   d. Accessible billing

   e. Accessible facility to test compatibility of terminal equipment[12] or appropriate returns policy

   f. Facility for disabled subscribers to register requirements

   g. Provision of text relay service (TRS)

   h. Accessible information

   i. Requirement for an accessibility statement

36 These Measures are in place to ensure:

   • equivalent access to and choice of ECS for people with disabilities, and

   • that people with disabilities are protected, and

   • that end-users with disabilities don't meet obstacles in their access use of ECS.

37 Service Providers have largely implemented these Measures and they are now operational.

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[12] Terminal equipment in the case of this Measure is a mobile phone.

Trends and developments

38 Chapter 3 of the Call for Inputs (23/80) outlines the trends and developments since the introduction of the Measures in 2014 and 2015. For Irish consumers, the following paragraphs summarises they key trends that may have an impact on choice and equivalent access for people with disabilities in accessing ECS services and information;

39 ComReg published its "Mobile Consumer Experience Survey of Consumers Summer 2022" . We note the following from this survey:

- **smartphone ownership has increased to 86% in 2022 (up from 80% in 2019)**

- when asked, **8% of survey respondents recorded they have disability.** Among these respondents:

    o 96% say they own a mobile phone, of that 96%, 66% recorded they own a Smartphone (compared to all survey respondents, 86% have a smartphone)

    o 46% say that they are on a bill pay

    o 54% recorded that they have a landline (a fixed phone)

    o 55% of respondents with mobile phones have a prepay phone

    o Younger age groups are more likely to have a prepay phone contract (60% of those 24 and under)

    o The average monthly bill spend is €31.84; this is higher among the 25–34 age group, while over 55s have the lowest average spend

    o The average monthly prepay spend is €20.39

- **The use of Over the Top (OTT) services (for instance apps like, Facetime, WhatsApp, Viber) is low for all survey respondents.** For example, average minutes per day using internet-based app for voice calls is about 13 minutes for people with a disability compared to almost 22 minutes for all survey respondents.

40 In June 2023, the Central Statistics Office (CSO) published the results of its Census of Population, 2022[13] . We note the following from the summary results of the Census 2022:

- **Higher population figures** population up 8% to 5.15 million.

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[13] Census 2022 took place in April 2022; https://www.cso.ie/en/census/

- **22% of the population have at least one long lasting condition**

  Note: In Census 2022, the two questions on long-lasting conditions and difficulties were revised. The information reported here was compiled from a range of categories in the questions relating to long-lasting conditions and difficulties and the extent to which they were experienced. The difficulties reported included those experienced due to old age.

- **Over 1 million people (1,109,557, accounting for 22% of the population) recorded experiencing at least one long-lasting condition or difficulty to any extent**. Of these 22%, 407,342 people (8% of the population) recorded experiencing at least one long-lasting condition or difficulty to a great extent or a higher extent. A further 14% (702,215 people) recorded a long-lasting condition or difficulty to some extent or a little extent.

- **The amount of people experiencing a long-lasting condition or difficulty to any extent generally increased with age**. This ranged from 4% of people aged 0–4 years to 76% among people aged over 85. The percentage of each age group with a long-lasting condition or difficulty to a greater extent increased sharply after the age of 74. Among those aged 85 and older, just under half (48%) experienced a long-lasting condition or difficulty to an extent.

- This can be compared to Census 2016, where a total of 643,131 people reported they had a disability in April 2016, accounting for 13.5% of the population compared with 13% of the population in 2011. This represented an increase of 47,796 persons on the 2011 figure of 595,335 people.

- **In general, there is a change in the way we live our lives**

  - For example, we are spending increasing amounts of time online for work, shopping, banking, and socialising,

  - The COVID-19 crisis has fundamentally changed many things and has led to an increasing demand and use of digital technologies.

- **Accessible hardware and software that can address the needs of users with various types of impairments is more widely available,**[14] for example;

  - Blind and visually impaired people can adjust display settings such as font size or colour contrast. Text to speech to access menus, receive audio feedback and have text, such as SMS, read aloud can also be used,

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[14]The International Telecommunication Union (ITU) http://www.e-accessibilitytoolkit.org/toolkit/technology_areas/wireless_phones%20and%20ICT%20accessibility

- o Pictorial address books (containing an image of the person beside their name and phone number) has considerably empowered some people with cognitive disabilities to use cell phones,

- o Deaf persons can use a range of services including, SMS text messages, sign language via video calls (on 3G networks), other video-based services, such as, text to Avatar,

- o Persons unable to use a keyboard can use voice recognition software.

- **Forthcoming provisions under the European Accessibility Act (EAA) are relevant to the private sector and businesses including electronic communications sector.**

41   As part of its review of the Measures, ComReg considers market and technological developments as well as people's changing needs in relation to choosing and using ECS. Such trends and developments may impact on equivalent of choice and access to ECS for people with disabilities.

42   We are interested in the views of stakeholders on the trends and developments, set out in Chapter 3 of the Call for Inputs and summarised above, or their impact on people with disabilities as they access and use ECS services and related information.

43   The first two questions are as follows:

Q1 (a) Do you have any comments on the trends and developments set out above?
(b) Do you have any comments on the impact of trends and developments on accessing and using ECS services and related information for people disabilities? Please give details in your answer, if possible.

Q2 Are you aware of any market-led or technical developments to help people with disabilities access and use ECS services and related information? Please give details in your answer, if possible.

Review of the Measures

44   In Chapter 4 of the Call for Inputs, we present a review of the Measures, as et out in summary at paragraph 17 above. These are the specific services and supports available for people with disabilities. This review considers:

1. the effectiveness of the Measures,

2. the scope to clarify, update or withdraw any of the Measures, and

3. the potential for introducing new Measures (for example, new specific services and supports) that will ensure equivalent access and choice to ECS for people with a disability.

a. Measure 'accessible complaints procedures'

45 As a consumer, you need to know how you can raise issues that affect you with your service provider. Our [Code of Practice for Complaint Handling](#) [15] sets out how service providers should engage with consumers. We have also specified adopting accessible complaints procedures. These procedures support the complaints and enquiry process to help make sure that people with disabilities have access and choice when it comes to customer services and accessing the complaints procedures. This should be in line with services and procedures experienced by most people. Adopting an accessible complaints procedure makes this easier for everyone and gives you a channel for communication.

46 Service providers have obligations when it comes to complaints procedures. For example, they must:

- provide an accessible way for you to contact their customer services so you can make a complaint and an enquiry;

- offer you, as a customer, the power to nominate a third party to deal with complaints and/or enquiries on your behalf if this is what you want; and

- make sure that all staff handling your complaint are trained to appropriately deal with your requirements.

47 We ask the following questions about this Measure.

Q3 Do you agree that the Measure 'accessible complaints procedure' is needed to make sure people with disabilities have access to customer services and complaints procedures (to make a complaint or an enquiry)? Please provide reasons to support your view.

Q4 Are there changes which should be made to the Measure 'accessible complaints procedure'? Please give details in your answer, if possible.

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[15] ComReg Decision D04/17, ComReg Document No. 17/62.

b. Measure 'accessible directory enquiries'

48   Consumers with a visual impairment may access a directory enquiries service by phone through the number 196. To avail of this free service, your doctor needs to give you a certificate that says you are entitled to this service. Once this is confirmed, the consumer must contact their service provider to register with them. This will allow them to use the 196 service.

49   We ask the following questions about this Measure:

Q5 Do you agree that the Measure 'accessible directory enquiries' (196 service) is needed to give people with disabilities access to a directory of subscribers or directory information services? Please give reasons for your answer.

Q6 Are there changes that should be made to the Measure 'accessible directory enquiries' (196 service)? Please give details in your answer, if possible.

c. Measure 'accessible top-up facility for pre-paid mobile user's'

50   All mobile phone users must be able to access their top-up facility, so they have full use of their mobile.

51   Service providers providing pre-pay mobile services are required to provide an SMS top-up facility. This is for customers with a disability where:

- a cash top-up does not involve any voice prompts,

- a top-up receipt or voucher is clear, easy to understand, and

- the top-up receipt and allows the customer to apply the top-up by SMS or any equivalent method without help from a third party.

52   After topping up, confirmation of the value of the top-up credit must be sent to the customer's mobile phone so the customer knows the top-up credit has gone through without having to follow voice prompts.

53   We ask the following questions about this Measure.

Q7 Do you agree that the Measure 'accessible top-up facility for pre-paid mobile users' is needed to give people with disabilities access to mobile services? Please give reasons for your answer.

Q8 Are there changes that should be made to the Measure 'accessible top-up facility for pre-paid mobile users'? Please give details in your answer, if possible.

d. Measure 'accessible billing'

54   You may ask your service provider to give you your bill and details of your transactions in a way that is accessible to you (for example, Braille).

55   We the following questions about this Measure.

Q9 Do you agree that the Measure 'accessible billing' is needed to facilitate end-users with disabilities access their bills and related information? Please provide reasons to support your answer.

Q10 Are there changes that should be made to the Measure 'accessible billing'? Please give details in your answer if possible.

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e. Measure 'accessible facility to test compatibility of terminal equipment or offer appropriate returns policy'

56   If you have a hearing aid or cochlear implant and wish to buy a phone or phone equipment from your service provider but are unsure if you can use it, your service provider must:

- allow you to test the mobile phone at their shop before purchasing, or

- offer a returns policy that allows for a mobile phone that had not been tested before a purchase of your ECS to be returned because it fails to meet specific hearing needs.

57   To avail of this service, you need to have a certification from your doctor to show you are entitled to this service.

58   Staff in every service provider's retail shop must be trained in the use of the testing equipment and be able to answer any queries raised by customers before they buy a mobile phone.

59   We ask the following questions about to this Measure.

Q11 Do you agree that the Measure 'facility to test compatibility of terminal equipment or appropriate returns policy' is needed to facilitate end-users with disabilities access to ECS? Please provide reasons to support your answer.

Q12 Are there changes that should be made to the Measure 'facility to test compatibility of terminal equipment or appropriate returns policy'? Please give details in your answer if possible.

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f. Measure 'facility for customers with disabilities to register requirements'

60 Every service provider is required to maintain a facility for you to register your requirements, as a customer with a disability, if you choose to do so. The register, with your consent, will contain the following information:

- personal details such as name, address, contact details (including phone or email and/or a third-party nominated contact)

- your preferred means of communication

- your preferences about bundles (for example broadband or text only)

- details of any special terminal equipment you need to access your ECS

- details of any alternative billing method you need

61 We ask the following questions about to this Measure.

Q13 Do you agree that the Measure 'facility for customers with disabilities to register requirements with their service provider' is needed to support customers with disabilities when choosing and using ECS and when dealing with their service provider? Please give reasons for your answer.

Q14 Are there be changes which should be made to the Measure 'facility for customers with disabilities to register their requirements with their service provider'? Please give details in your answer, if possible.

g. Measure 'Text Relay Service' (TRS)

62 Since 2017, every service provider with more than 100,000 subscribers (that is over 90% of landline providers and more than 95% of mobile providers) must provide access to a text relay service.

63 This service can be used over a range of electronic devices, including smartphone, personal computer and tablets.

64 The TRS translates text into voice (TTV) and, voice into text (VTT), to facilitate people who are deaf or hard of hearing people. It is also useful for people in the Republic of Ireland with speaking difficulties. They can also use this to make or take calls, whether this is on a landline or a mobile device.

How TRS works

- Calls go through TRS agents who translate what you say and what the other person says.

- TRS can be used with smartphones, tablets, computers and textphones.

- TRS helps people with a disability access services like banking, utilities and travel by phone or online.

- You will find full information on how to access and use TRS on their website, www.itrs.ie

65   We ask the following questions about to this Measure.

Q15 Do you agree that the Measure 'Text Relay Service' is needed so people with disabilities can access ECS and related information? Please give reasons for your answer.

Q16 Are there changes which should be made to the Measure 'Text Relay Service'? Please give details in your answer, if possible.

h. Measure 'accessible information'

66   Every service provider needs to give you comprehensive and up-to-date information about any of its products or services for people with a disability. This means that you should be able to click from the home page of your service provider's website to go to an accessibility section.

67   Service providers must make sure that all contractual information is made accessible to you and is up to date. This includes notifications in relation to any changes to your contract.

68   We ask the following questions about to this Measure.

Q17 Do you agree that the Measure 'accessible information' is needed to facilitate all end-users with disabilities access to information on ECS products and services (in an accessible format and through appropriate channels)? Please provide reasons to support your answer.

Q18 Are there changes that should be made to the Measure 'accessible information'? Please give details in your answer, if possible

i. Measure 'accessibility statement'

69   All service providers are required to publish an accessibility statement on their websites. An accessibility statement is important for everyone and it should show how your service provider makes information regarding its products and services accessible to you. This statement should give you information about the following:

- the accessibility products and services available to you,

- the range of accessible contact methods they can give you, and

- their approach and policy in giving you accessible services and information.

70   The accessibility statement must be in an accessible format and available through appropriate channels.

71   We ask the following questions about to this Measure.

> Q19 Do you agree that the Measure 'accessibility statement' is needed to ensure that end-users with disabilities can find and access information regarding the specific services and support available to end-users with disabilities? Please provide reasons to support your view.
>
> Q20 Are there any changes which could be made to the Measure 'accessibility statement'? Please provide reasons to support your view.

Response to Call for Inputs and summary of the Call for Inputs:

72   We will consider all the responses to the Call for Inputs and responses to this summary document. We will also take into account any information we receive through targeted consumer research and from service providers. This will help us to better understand any issues people with disabilities have about access to and choice of ECS. It will also highlight:

- if changes are needed to the specific support Measures already in place, and

- if any new measures are needed.

73   We will analyse and use where appropriate the responses to the Call for Inputs and this summary of the Call for Inputs in any future consultations on measures to make sure:

- People with disabilities have equivalent access to ECS, and

- That the objective of equivalent access and choice as regards ECS for people with disabilities is met.

74   We ask the following questions about the overall Measures, as set out in summary at paragraph 17 above.

Q21 See paragraph 17, (a) to (i) for the full list of Measures. Do you think the Measures for people with disabilities as listed are helpful to make sure people with disabilities enjoy the same access to and choice of ECS as most people? Please give reasons for your answer.

Q22 Can you think of other factors that are relevant to consider in making sure people with disabilities enjoy the same access to and choice of ECS as most people? Please give details in your answer, if relevant.

5 Submitting comments

Responding to this Consultation

78. We welcome responses from all stakeholders whether responding to some or all of the questions.

79. This document is a summary of the main version of the Call for Inputs document 23/80) and the topics and the questions above are covered in the Call for Inputs in greater detail.

Deadline to get back to us

80. Please respond to the Call for Inputs (23/80) or this summary document (23/80a) by **5pm on 27 October 2023.**

81. It will make it easier for us to analyse your response if you add the question number to your answers. In all cases, please give reasons for your answers.

We plan to publish responses

82. In the interests of openness and transparency, we will publish all non-confidential submissions we receive. Therefore, we ask that you submit electronic submissions (such as those using MS Word) in an unprotected format (no passwords). This will allow us to publish them electronically. We will publish submissions, subject to the provisions of ComReg's Guidelines on the Treatment of Confidential Information.[16]

83. Please identify any confidential material clearly and put it in a separate Annex to your response.

How to send back your responses

84. Please submit your response in written form, submitted either by post or email to the addresses below and clearly mark it as **"Submissions to ComReg Document No.23/80 and or ComReg Document No. 23/80a".**

Where to send back your responses

85. Email responses should be sent to:

retailconsult@comreg.ie

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[16] ComReg Document No. 05/24.

86. Postal responses should be sent to:

Retail Consult

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Phone: +353 1 804 9654

6 Annex 1: Consultation Questions

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