



Office of the Director of
**Telecommunications
Regulation**

RESPONSE TO CONSULTATION

**ntl's Price Increase Application
for Cabled Licensed Areas**

Document No: ODTR 01/80

Date: 2 October 2001

Oifig an Stiúrthóra Rialála Teileachumarsáide

Office of the Director of Telecommunications Regulation

Abbey Court, Irish Life Centre

Lower Abbey Street, Dublin 1, Ireland

Tel. +353 1 804 9600 Fax. +353 1 804 9680 E-mail info@odtr.ie

Contents

Foreword by Director	2
1 INTRODUCTION	3
1.1 BACKGROUND	3
1.2 CONSULTATION	3
1.3 LIST OF RESPONDENTS	3
2 CONSULTATION ISSUES.....	5
2.1 CONSIDERATION OF APPLICATION OUTSIDE ODTR 00/56.....	5
2.1.1 <i>Summary of Consultation Issues</i>	5
2.1.2 <i>Views of Respondents</i>	5
2.1.3 <i>Position of the Director</i>	6
2.2 STANDARDISATION OF PRICES	9
2.2.1 <i>Summary of Consultation Issues</i>	9
2.2.2 <i>Views of Respondents</i>	10
2.2.3 <i>Position of Director</i>	10
2.3 PRICING PROPOSALS	10
2.3.1 <i>Summary of Consultation Issues</i>	10
2.3.2 <i>Views of Respondents</i>	11
2.3.3 <i>Position of Director</i>	11
3 CONCLUSIONS.....	12
3.1 REASONS FOR APPROVING INCREASE	12
3.2 APPROVED PRICES	13
3.3 CONDITIONS ATTACHING TO THE APPROVAL	14
APPENDIX: LIST OF RESPONDENTS	15

Foreword by Director

This paper outlines the response to the consultation on ntl's application for a price increase outside of the established framework for rate regulation. We had 78 responses, including 71 from ntl subscribers, a high level of response to an ODTR consultation, reflecting the importance of the issues involved.

As noted in the consultation paper, ntl had put a major effort into network upgrade, in particular in the Dublin area, where the network had suffered from under-investment for many years. It had also invested in customer care with a new centre in Waterford opened last year. The responses to the consultation indicated some level of dissatisfaction still with aspects of service and network quality as outlined in this paper. Each issue raised has been investigated by the ODTR and ntl has been required to respond on all points made by respondents.

Since the launch of the consultation paper, ntl has introduced digital television services for 140,000 households, thereby more than repairing the failure to meet the end March deadline for 110,000 homes. For technical reasons outside of ntl's control, the network quality audit had to be delayed, but it will take place very shortly and ntl is committed to resolving any problems it may identify, together with dealing with a number of issues which were identified in the responses to the consultation.

I have to weigh in the balance the company's financial needs and the views of respondents, and in doing so have taken account of additional commitments from ntl as set out in this paper. In the light of these and on the basis of the conditions set out in Section 3.3, I have decided that the increases requested should be allowed.

As noted in Section 2.1.3, I have agreed with ntl the termination of in-platform exclusivity from 1 March 2002. This will open the way for further competition in the market. I also intend to review competition in the television distribution market in mid/second half of 2002. This will, inter alia, consider the future of price control, whether the existing formula should be maintained or revised/replaced, and/or whether adjustments should be made to reduce or remove rate regulation.

Etain Doyle,
Director of Telecommunications Regulation.

1 INTRODUCTION

1.1 Background

The Director of Telecommunications Regulation (“the Director”) and her Office (“the ODTR”) are responsible for the regulation of the Irish telecommunications and broadcasting markets in accordance with EU and national legislation.

The cable/MMDS licences issued in 1999/2000 provide for a period of in-platform exclusivity until April 2004. Under the provisions of Regulation 15 (1) of the Wireless Telegraphy (Programme Services Distribution) Regulations 1999, the prior written consent of the Director is required for proposed charges for basic television services distributed by cable/MMDS and for any subsequent changes to those prices during any period of exclusivity. Similar powers exist in relation to cable licences issued under the Wireless Telegraphy (Wired Broadcast Relay Licences) Regulations, 1974.

Last year, the ODTR issued the Report on the Consultation, *Rate Regulation Mechanisms for Cable and MMDS Television Operators* (ODTR 00/56) outlining the framework for evaluating price increase applications. In June 2001, ntl made a formal application for a price increase in which it asserted that a greater increase than that provided for under the rate regulation mechanism detailed in ODTR 00/56 was warranted due to the significant increases in operational, programming and capital costs since its last price increase in 1998.

1.2 Consultation

In August, the Director published a consultation paper, *ntl’s Price Increase Application for Cabled Areas* (ODTR 01/64), seeking views on her proposals to assess ntl’s application outside the scope of the rate regulation mechanism set out in ODTR 00/56.

This document summarises the responses to the consultation paper and outlines the conclusions reached, taking account of the submissions received and other relevant legal and technical considerations.

1.3 List of Respondents

Seventy-eight responses to the consultation paper were received and are listed in the Appendix. Of these, seventy-one were from ntl subscribers.

The Director wishes to express her thanks to everyone who contributed to the consultation. With the exception of material marked confidential, the written comments of respondents are available for inspection by appointment at the ODTR's office in Dublin.

This paper does not constitute legal, commercial or technical advice. The Director is not bound by it. This response to the consultation is without prejudice to the legal position of the Director and to her rights and duties under legislation.

2 CONSULTATION ISSUES

The consultation paper set out the Director's proposals to assess ntl's application outside the scope of the rate regulation mechanism set out in ODTR 00/56 and views were invited on the following:

- ❑ consideration of application outside ODTR 00/56;
- ❑ price standardisation proposals;
- ❑ ntl's pricing proposals for Dublin, Galway and Waterford.

The majority of respondents gave global answers rather than replying to specific questions. However, points raised will be dealt with under the appropriate heading below.

2.1 Consideration of application outside ODTR 00/56

2.1.1 *Summary of Consultation Issues*

The Director is minded to assess the ntl application for a price increase outside the scope of the rate regulation mechanism. As outlined in the consultation paper, the key reasons why ntl believed it warranted an increase greater than that provided for by the rate regulation mechanism in ODTR 00/56 were the substantial investments in terms of operating costs and capital expenditure and the increases in programming costs. Operating costs increased by more than 30% between 1999 and 2000, while ntl's capital investment in 2000 amounted to over £200 per subscriber. Programming costs increased by 11% since ntl's last price review in November 1998.

2.1.2 *Views of Respondents*

Eleven of the sixteen respondents who expressed a view on this issue opposed the consideration of the ntl application outside the rate regulation mechanism set down in ODTR 00/56. The reasons for their opposition were many. A number of respondents maintained that the level of service provided by ntl did not merit consideration outside the rate regulation mechanism, citing poor customer service, signal quality problems, changes in channel line-up and the delay in rolling out digital services.

Other reasons against consideration of the ntl application outside ODTR 00/56 were the absence of separated accounts; analogue customers should not have to fund investment in digital services; the absence of open access to cable networks for other operators; ntl's monopoly position; absence of any international comparisons to support ntl's claim that its prices were relatively lower and that telecommunications costs have decreased in recent years.

Five respondents agreed with the proposal to consider ntl's application outside ODTR 00/56 on condition that the existing service was maintained, and in particular that full TV5 service was restored.

2.1.3 Position of the Director

As outlined in the consultation paper, this is an exceptional price application, which the Director proposed to deal with on a once-off basis outside of the framework of the rate regulation formula set out in ODTR 00/56.

The Director has carefully reviewed all the points raised by respondents and has also obtained ntl's response including commitments in respect of certain matters.

Customer service issues: In response to customer service issues raised by 23 respondents – e.g. delays in responding to telephone queries, inadequate/inaccurate information from customer service staff, ntl has indicated that high standards in customer service is a genuine high priority for the company. It states that it has introduced many new initiatives recently including the recruitment of 16 additional customer service staff, restructuring the Customer Service Division, rolling out a new customer management system and increasing the focus on training so as to provide better quality and more accurate customer service.

In relation to delays with customer service, ntl data indicates that the average response time in answering customer telephone calls remained variable over recent months. ODTR recent spot monitoring indicates call waiting periods between 1½ and 10 minutes. ntl's further improvement programme including call streaming and better training are expected to reduce this further in the short term.

However once contact has been made, ODTR's spot monitoring indicated that information and assistance provided by call centre staff has generally been to a high quality indicating that ntl's training programmes appear to have a positive effect.

A review of service parameters is underway in the context of the MLOP (measuring licensed operator performance) programme and ntl will be required to report on these to the ODTR which will publish results on a regular basis. The ODTR will continue to keep these issues under review and if needed will draw up measures to ensure that standards are maintained and improved. Such measures may include requiring modifications to the company's code of practice in relation to complaints handling.

Installation and maintenance: In response to the installation and maintenance aspect of customer service issues raised by 3 respondents, ntl states that it has appointed a new Head of Field Operations who will control both installations and maintenance, thus leading to a higher level of co-ordination and consistency between what was previously two separate departments. In addition, ntl has informed the ODTR that it has introduced a system to better supervise contractors and has adopted a best service practice in relation to amplifiers, which allows it to restore service at the earliest opportunity for its customers. ntl has also supplied statistics which show that there has been a consistent downward trend in fault rates per 100 customers over the past 12 months. The statistics also indicate a very high level of keeping customer appointments with over 90% of customer service calls to customers' premises made within the arranged time.

Network Quality: Eighteen respondents raised issues of picture quality affecting a small number of areas in Dublin. These have been reviewed by the ODTR technical staff with ntl technical staff and the causes identified. ntl is already working on dealing with these issues and all remedial action required will be completed by the end of March 2002.

The ODTR has confirmed that ntl incurred capital expenditure of over £70 million during 2000. A large element of this expenditure was directly related to network quality. ntl has confirmed that it will complete the necessary improvements as detailed below.

A planned network audit in Dublin has been deferred due to technical reasons outside ntl's control but the Director expects it to take place during the month of October. This audit is expected to identify network faults which, when rectified, will improve network quality and reliability for customers of basic and other services. The ODTR requires that by 31 December 2001, a programme of remedial work to be completed by 30 September 2002 will have been drawn up by this office in conjunction with ntl. If either of these deadlines are not met, the ODTR will require that a reduction of 10% in the price of basic services be applied by ntl.

Channel line-up: Many subscribers contacted the ODTR about the changes to the frequency and hours of transmission of TV5. The non-availability of other named programme services and the substitution of the National Geographic channel by the Discovery channel were also mentioned. While these issues are relevant to individual subscribers, responsibility for content regulation now rests with the Broadcasting Commission of Ireland (BCI). The ODTR controls the number of channels not the content. Accordingly, such issues have not been taken into account by the ODTR in considering the issue, but in view of the level of concern the ODTR obtained an explanation from ntl.

ntl has indicated that it is aware that any channel change will cause disruption and frustration to some customers. The objective it set itself is to provide customers with the best possible channel line-up and to outweigh any disruption or frustration which the change causes with positive sentiments by a greater number of viewers. The proportion of viewers watching TV5 was less than 0.1%, as was the case for National Geographic. ntl states that the new line-up is more acceptable to a larger number of its viewers. ntl also states that it has made TV5 available in digital format on a 24 hour basis. Likewise, it has allocated National Geographic a 24 hour channel slot on its digital service which is an increase of six hours.

Rollout of Digital Television Services: Under the terms of its licences, the company is obliged to meet specified time related roll out targets for the provision of digital services, the first of which was end March 2001. However, Paragraph 9 (3) of the licences issued under the 1999 Regulations¹ provides for a six-month period during which roll out breaches may be repaired. The Director is satisfied that ntl has provided digital television services before the end of September deadline. This means that the target of 110,000 homes for end March 2001 has been more than met, with ntl offering services to over 140,000 homes in the three areas, Dublin, Galway and Waterford.

Separated Accounts: While separated accounts were not available to the ODTR for its assessment of the ntl application, the ODTR carried out a review of Financial and Management accounting information provided by ntl for 1999/2000 and the Director is satisfied that ntl incurred the capital and operational costs claimed.

Analogue Customers & Digital Investment: Seventeen respondents maintained that analogue customers should not have to fund investment in digital services. However, investment in the upgrades for digital also benefits analogue customers. The installation of the new television headends, which are operation for digital customers and are currently being tested for analogue service, and the further integration of fibre into the network will result in noticeable improvements in picture quality. These should be apparent to analogue customers by the end of this year in Galway and Waterford and for large areas of Dublin.

International Comparisons: Another respondent asserted that international comparisons of the prices for basic service should be included as a criterion in the assessment of this price increase application. However, the Irish pay-television market has unique features which means that comparisons are not straightforward. In particular, the bundling of other services outside Ireland makes comparison difficult. One of the main drivers for cable subscription in Ireland is access to the

¹ Wireless Telegraphy (Programme Services Distribution) Regulations, 1999 (S.I. No. 73 of 1999)

UK terrestrial channels. These channels are not generally available outside the UK and Ireland. In the UK cable operators do not incur costs in securing distribution rights, while in Ireland, ntl is required to pay a fixed sum per subscriber to secure the right to carry these channels. In some jurisdictions cable companies are paid by television channels in return for their inclusion in the service and the mix of programming differs. Accordingly, direct international comparisons would not necessarily be reliable in assessing the application. Nonetheless, the basic monthly ntl rate in the UK for 16 television channels is £16.99 sterling (when adjusted for VAT and exchange rate this is equivalent to IR£22.21).

Monopoly Situation: A number of respondents expressed their opposition to the monopoly situation created by the in-platform exclusivity condition in the 1999 cable and MMDS licences. The reasons for the in-platform exclusivity are set out in earlier papers issued by the ODTR. ntl has agreed to a shortening of the in-platform exclusivity period to 1st March 2002 which will facilitate competition in the television distribution market. The ODTR intends to issue a consultation paper on licensing for television distribution in a market without in-platform exclusivity, with a view to establishing a new licensing regime in early 2002.

Open Access: The question of open access to the ntl network for other operators does not arise because the network is not capable of supporting it.

Telecommunication Charges: Changes in telecommunications charges are also not relevant in the consideration of this application for television distribution price increases.

In the light of these considerations and the ntl commitments outlined above, together with the conditions set out in Section 3.3, the Director has decided to consider the price increase outside of the rate regulation mechanism.

The Director reiterates her earlier point that this is an exceptional price application, which she is dealing with on a once-off basis outside of the framework. The procedures set out in ODTR 00/56 will apply to any future applications for an increase, subject to the review of competition in the television distribution market in 2002, as mentioned in the consultation paper (ODTR 01/64).

2.2 Standardisation of Prices

2.2.1 Summary of Consultation Issues

In its application, ntl proposed to standardise prices in its three cable licensed areas, Dublin, Galway and Waterford.

2.2.2 Views of Respondents

Only 15 respondents commented on this issue, with just over half opposing the proposal to standardise prices in ntl's three cable licensed areas. The reasons for the opposition were varied.

Five respondents disagreed on the basis that separated accounts by licensed area were not available. A further two respondents asserted that the economies of scale in Dublin should lead to a lower rate in the capital, while another respondent referred to the lack of foreign language channels in Dublin.

Three respondents supported the proposal on condition that there were standard packages in the three cable areas.

2.2.3 Position of Director

As stated in the consultation paper the Director had no objection to the standardisation of prices in ntl's three cable licensed areas given that services provided are identical in the three areas.

The Director is cognisant of the fact, that due to the state of the Dublin network, considerably more resources must be devoted to address the upgrade than in the other two areas. ntl has also indicated that a standardised price reduces its costs in terms of marketing and billing.

The separated accounts and channel line-up issues raised by respondents in relation to standardised prices have been addressed in Section 2.1.3.

Accordingly, the Director accepts ntl's request that a standard price apply in Dublin, Galway and Waterford.

2.3 Pricing Proposals

2.3.1 Summary of Consultation Issues

ntl requested approval for a standard annual price of £136.00 (the proposed standard monthly price would be £12.21) for the basic service in each of its three cable licensed areas. The proposed rates would result in an increase of 33.8% on the annual basic service charge in Dublin, 25.8% in Waterford and 15.2% in Galway. The basic service provided by ntl is identical in the three cable areas.

2.3.2 *Views of Respondents*

Just over half (51%) of respondents disagreed with the proposed prices, with almost as many (45%) conditionally supporting a price increase. Only one respondent agreed fully with the pricing proposals.

Many of those who disagreed with the pricing proposals did so for the reasons outlined in Section 2.1.2.

Some of those who agreed conditionally with the proposals maintained that ntl should be required to improve the service before it receives approval for any price increase. Some stated that they would support the proposed increase if TV5 service were restored, while others' support was subject to the availability of broadband services.

A number of respondents argued that the proposed price increases were excessive, especially for the less well off in society such as OAPs and suggested using either CPI or the rate regulation mechanism to determine the increase.

2.3.3 *Position of Director*

ntl's response and the Director's position in relation to the service related issues are dealt with in 2.1.3.

The expenditures to date relate to the upgrade of the network for television distribution. The Director does not propose to make any approval of price levels conditional on the availability of broadband services.

The Director has drawn ntl's attention to the fact that the increases proposed may create difficulties for some customers, particularly those on fixed incomes. However a decision to provide discounts for certain categories of customers is a matter for ntl.

Having considered the views of respondents, ntl's response to points raised by those respondents, the progress it has made in resolving those issues and commitments given to the ODTR, the Director has decided to approve the proposed prices for ntl's cable services with a number of conditions attached. These are discussed in Section 3.

3 CONCLUSIONS

In arriving at her decision on ntl's application for a price increase, the Director has considered the views received in the course of this consultation, the information supplied by ntl in its application and a review of ntl's compliance with its licence obligations carried out by the ODTR during the consultation period.

3.1 Reasons for Approving Increase

The report above outlines the issues. In summary the key points are:

- Three new television headends capable of providing digital services have commenced operations for Dublin, Galway and Waterford. These are currently being tested for providing analogue services and will be fully operational before the end of the year. These headends are built to the same standard design and have a high degree of redundancy, which will improve the reliability of the service as well as improving picture quality for all customers.
- By the middle of Q3 2001 over 40% of the primary trunk network (PTN) had been replaced by fibre in Dublin, Galway and Waterford. For example in Dublin, a total of 95km of new fibre has been installed in the last two years. All fibre nodes have un-interruptible power supplies (UPS) and this has been a major factor in increasing network availability.
- ntl has implemented a new network management programme based on key performance indicators, which allows the continuous monitoring of network faults, network availability and headend availability. These figures have recently been made available to the ODTR and will be monitored on a regular basis.
- The number of breakdowns has declined since the second quarter of 2000, with breakdowns for Q2 2001 down over 40% on those for the same period last year. Statistics provided by ntl also show an improvement in network availability, which is now better than the 99.9% level required in the technical conditions of the licences.
- A further investment in terms of both staff and resources was made in 2000 with the opening of the Waterford call centre. In addition to the initiatives outlined in section 2.1.3 above, ntl has indicated that it is undertaking system improvements to help automate routine transactions and refresher training to improve staff knowledge and accuracy of response.

In summary the investment spent on network improvements is considerable and will benefit both analogue and digital customers. There are a limited number of problem areas in Dublin which were identified during the course of the consultation. Rectification is being made subject to specific performance requirements as outlined in Section 3.3 below and ntl has confirmed its commitment to funding this programme along with a programme of remedial work to be set following a network audit.

3.2 Approved Prices

The tables below summarise the approved prices for each of ntl's cable licensed areas.

Area	Category of payment	Current Charge	Proposed Charge (£)	Euro Equivalent	Increase (£)	Increase (%)
Dublin	Annual	£101.65	£136.00	€172.68	£34.35	33.8%
	Six monthly	£53.06	£71.04	€90.20	£17.98	33.9%
	Monthly	£9.12	£12.21	€15.50	£3.09	33.9%

Area	Category of payment	Current Charge	Proposed Charge (£)	Euro Equivalent	Increase (£)	Increase (%)
Galway	Annual	£117.52	£136.00	€172.68	£18.48	15.7%
	Six monthly	£61.49	£71.04	€90.20	£9.55	15.5%
	Monthly	£10.57	£12.21	€15.50	£1.64	15.5%

Area	Category of payment	Current Charge	Proposed Charge (£)	Euro Equivalent	Increase (£)	Increase (%)
Waterford	Annual	£108.10	£136.00	€172.68	£27.90	25.8%
	Six monthly	£56.53	£71.04	€90.20	£14.51	25.7%
	Monthly	£9.72	£12.21	€15.50	£2.49	25.6%

All prices shown include VAT at 20% and take account of licence fee at 3.5%. Any adjustment to these rates will necessitate an automatic adjustment in final prices.

All customers who subscribe to the basic television service only, whether existing or new customers have and will retain the choice of annual, 6 monthly or monthly payment.

In the case of subscribers to other ntl services, ntl's terms and conditions require that subscribers accept monthly billing. ntl states that it cannot offer annual billing for basic services combined with monthly billing for other services. Consequently it requires such categories of customer to accept

monthly billing for all services. ntl has indicated to the ODTR that it is changing over its remaining premium subscribers and that this changeover is proceeding smoothly. However, if there are any difficulties, the ODTR will review the situation.

3.3 Conditions attaching to the Approval

Arising from the issues raised in the consultation, the following conditions will apply to the Director's approval of ntl's proposed prices:

- ❑ ntl will provide data to allow the ODTR to measure performance of specific customer service related parameters. The ODTR will publish results on a regular basis.
- ❑ ntl will provide separated accounts within a time-scale to be proposed by the ODTR, in a form provided by the ODTR for each of its licensed areas in respect of its current financial year and each subsequent year;
- ❑ Following the planned network audit in Dublin, by end December 2001 ntl will have agreed a programme of remedial work which shall be completed by 30 September 2002;
- ❑ The upgrade to deal with the picture quality problem areas in Dublin identified in the responses to the consultation must be completed by 1st of March 2002.

Failure to comply with any of the above conditions in the specified timeframe will lead to the Director issuing a direction to ntl to reduce the approved price by 10%.

ntl has given the Director commitments regarding its intention to finance and implement the programme as set out above. As noted in Section 2.1.3, the company has agreed to a shortening of the in-platform exclusivity period to the 1st March 2002 which will facilitate competition in the television distribution market. The ODTR intends to issue a consultation paper on licensing for television distribution in a market without in-platform exclusivity, with a view to establishing a new licensing regime in early 2002.

As indicated in ODTR No 01/64, the Director intends to review competition in the television distribution market in mid/second half of 2002. This will, inter alia, consider the future of price control, whether the existing formula should be maintained or revised/replaced, and/or whether adjustments should be made to reduce or remove rate regulation.

APPENDIX: LIST OF RESPONDENTS

1	Tom Rogers	Galway
2	G Hughes	Blackrock
3	Michael Gorman	Dublin 4
4	Ciaran Judge	Dublin 6
5	Michael Dixon	Stillorgan
6	Denis Connolly	Mount Merrion
7	Stephen O'Hara	Dublin 24
8	John O'Connell	Dublin 13
9	David Ferrie	Dublin 24
10	Geraldine Moloney	Dublin Centre
11	Paul Ince	Dublin 1
12	Fergus McDonald	Leixlip
13	Mark Ennis	Dublin 11
14	Office of the Director of Consumer Affairs	
15	Adrian Somerfield	Dublin 14
16	Pat Morrissey	Lucan
17	Edward McCluskey	Dublin 13
18	Jerry O'Halloran	Blackrock
19	A. Bray	Dublin 13
20	Harry Osborne	Dublin 1
21	Tom Culleton	Dublin 16
22	Peter Nugent	Deansgrange
23	Tim Healy	Dublin 20
24	Patrick Grimes	Dublin 10
25	G R Brown	Dublin 18
26	John Moran	Dublin 15
27	John Murphy	Blackrock
28	Douglas Carson	Dublin 13
29	Sean Hennessy	Dublin 1
30	Anne Dunne	Dublin 12
31	Peter Bradshaw	Dublin 16

32	Kolette Enright	Dublin 14
33	Antoin Daltun	Dublin 4
34	Bill Kedroff	Dublin 14
35	Alan Munnelly	Dublin 12
36	Peter Harding	Co Dublin
37	Robert Fitzgerald	Dublin 7
38	Nora O'Leary	Portmarnock
39	F Cantwell	Dublin 4
40	Michael F O'Kelly	Stillorgan
41	Ivan O'Grady	Dublin 7
42	Kathleen Kealy	Dublin 15
43	A S Cunningham	Dublin 16
44	Language Training Centre, CMOD Dept of Finance	
45	Fintan Ryan	Dublin 6
46	Ronan Callanan, Communications Dept, DCU	
47	Paul J Cannon	Dublin 4
48	Mary Thornton	Dublin 6
49	Ivy Tighe	Dublin 6W
50	David Jacobs	Dublin 16
51	Kevin Keogh	Dublin 8
52	Shane Barry	Dublin 6
53	Patrick Lane	Killiney
54	Kieran Conway	Dublin 15
55	Jim Jackson	Dublin 3
56	Consumer Association of Ireland	
57	Brian Greene	Dublin 13
58	Eleanor Moussoulides	Blackrock
59	Anne Nevin	Dublin 14
60	Frank McGowan	<i>e-mail</i>
61	Richard Sullivan	Clane, Kildare
62	Anne Brindley	Galway

63	Eamon Gibbons	Galway
64	John Burke	Galway
65	eircom	
66	Christopher Cowan	<i>e-mail</i>
67	Damien Lane	<i>e-mail</i>
68	Crona Barrett	<i>e-mail</i>
69	Luke Murphy	<i>e-mail</i>
70	Joe Brennan	<i>e-mail</i>
71	Ray Mescal	Dublin 18
72	Kevin Carr	Dublin 7
73	Dorothy Barry	Dublin 9
74	Grainne Tallon	Dublin 5
75	National Association of Tenants' Organisations	
76	Joan Manning	Dublin 6
77	Michael J Leonard	Dublin 6
78	Chantal Benani	Dublin 6