



Commission for
Communications Regulation

Information Notice

Provision of Universal Service by Eircom

Performance Indicators Q1 – Q3 2006

Document No:	07/11
Date:	23 February 2007

An Coimisiún um Rialáil Cumarsáide

Commission for Communications Regulation

Abbey Court Irish Life Centre Lower Abbey Street Dublin 1 Ireland

Telephone +353 1 804 9600 Fax +353 1 804 9680 Email info@comreg.ie Web www.comreg.ie

Contents

1 Foreword	3
2 About the Universal Service Obligation.....	4
3 Methodology for Quality of Service Performance Indicators.....	5
Appendix	7
DIRECT ACCESS PSTN REPAIR.....	10
FUNCTIONAL INTERNET ACCESS.....	11
PUBLIC PAYPHONES.....	11
AFFORDABILITY OF TARIFFS.....	12
SPECIFIC MEASURES FOR DISABLED USERS.....	12

1 Foreword

The Commission for Communications Regulation (ComReg) is responsible for the regulation of the electronic communications sector in accordance with national and EU legislation. Among ComReg's functions in this regard to determine the scope of the Universal Service Obligation ("USO") for the Irish market and decide which undertaking(s) should be designated as the Universal Service Provider(s) ("USP"). In July 2003, Eircom was designated as the Universal Service Provider (USP) for a period of three years. Following a public consultation in July 2006, Eircom was again designated as the USP for a period to end June 2010.

Regulation 10 of the Universal Service Regulations requires the USP to publish information on its performance. In exercise of ComReg's general powers to publish information under Regulation 17 of the Framework Regulations, ComReg has decided to simultaneously publish the performance data and, subject to further review, will update this on a quarterly basis.

ComReg considers that publication will provide increased transparency regarding the fulfilment of the USO and will help to inform debate regarding related matters.

ComReg is currently considering whether performance targets should be set regarding specific aspects of the USO. It appears that while a majority of consumers are receiving installations within guidelines, a number are not, and this is appropriately a cause of concern for ComReg. In particular, it should be noted that the trend on faults indicates that the volume of faults reported is steadily increasing while the time taken to complete repairs is also lengthening.

ComReg is publishing this information to raise public awareness of the issues involved. In addition, and in order to address its concerns on behalf of consumers, ComReg will hold a public consultation during April on the question of directing targets (rather than guidelines) for delivering aspects of the USO. The consultation will be held prior to taking a decision on this issue.

Mike Byrne
Chairperson

2 About the Universal Service Obligation

The Universal Service Obligation (USO) is a set of requirements designed to ensure that all persons have access to a minimum set of telephone services.

The services to be provided under the Universal Service Obligation, as set out in the USO Regulations¹, are:

1. Meeting reasonable requests for connections at a fixed location to the public telephone network and access to publicly available telephone service. The connection is required to be capable of allowing voice calls, fax communications and data communications at data rates which would permit functional internet access,
2. Directory services – provision of printed Directories along with the operation and maintenance of the National Directory Database,
3. Provision of public payphones,
4. Specific measures for disabled users,
5. Affordability of tariffs for consumers and options to control expenditure

Eircom was designated as the Universal Service Provider (USP) in July 2003 for a 3 year period. Following a public consultation in July 2006, Eircom was again designated as USP for a period to end June 2010².

Detailed requirements have been set in respect of some aspects of the above:

- Document 05/64³ amended an earlier decision requiring the production of telephone directories in CD format,
- Document 05/70⁴ set out requirements to be followed by the USP when considering the reasonable of requests for connections, and also set out guidelines to be followed (including performance targets) on providing such connections. The document also provided guidelines in respect of a target data rate for Functional Internet Access,
- Document 06/14⁵ provided guidance on the criteria to be applied when considering requests for the removal or re-location of public payphones.

¹ [European Communities \(Electronic Communications Networks and Services\) Universal Service and Users' Rights\) regulations 2003 – S.I. No. 308 of 2003](#)

² [The Future Provision of Telephony Services Under Universal Service Obligations](#)

³ [Directory Enquiry Services and Directories - Amendment of requirement to make directories available in CD format](#)

⁴ [Universal Service Requirements: Provision of Access at a Fixed Location – Connections to Public Telephone Network and Provision of Functional Internet Access](#)

⁵ [Universal Service Obligations - Removal/Relocation of Public Pay Telephones](#)

3 Methodology for Quality of Service Performance Indicators

Regulation 10(1) of the Regulations requires the USP to publish adequate and up to date information on its performance in respect of the USO. The information is to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive⁶. These in turn are based on European Telecommunications Standards Institute (ETSI) standards which provide precise detail on definitions and methodologies and have been used in recording the performance indicators. Where the ETSI standards do not cover an aspect of the USO, specific indicators have been developed to ensure that the performance is measured.

In summary the performance indicators address the following aspects of the Universal Service Obligation:

1. Direct Access Public Service Telephone Network (PSTN) Provision

This section deals with the USP's record in completing fixed line installations. This section provides information on the percentage of installations which were completed by the date agreed with the customer. Also measured is the time taken for 95% and 99% of all installations. Both of these metrics are as specified in the ETSI standard.

In September 2005, ComReg issued, as guidelines, performance targets for installations. The distribution of actual installations against the time periods set out in the performance targets is also shown.

2. Direct Access PSTN Repair

This section deals with how many line faults were reported to Eircom and how many were fixed during the reporting period.

All faulty lines that are reported in the specified quarterly period are included and reported as a percentage of total installed lines. It should be noted that fault reports which are subsequently found not to be justified (e.g. if a customer reports a fault and it turns out not to be a network fault) are excluded i.e. the data reported here represents actual faults.

In terms of reporting on repair rates, the ETSI standard calls for the measurement in working hours for the fastest 80% & 95% completed.

3. Functional Internet Access (FIA)

Broadband access does not fall within the scope of the USO with the Directive making clear that the requirement is for a single narrowband connection. In September 2005, ComReg specified a target data rate of 28.8 kbps (kilobits per second) as the minimum data rate which could be considered as capable of

⁶ DIRECTIVE 2002/22/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 7 March 2002 on universal service and users' rights relating to electronic communications networks and services (Universal Service Directive)

delivering functional internet access. Also issued by way of guidance was a performance target of 94% of lines to be capable of the target data speed by June 2006.

This section records the percentage of PSTN lines which are capable of the minimum data rate 28.8 kbps or greater. This is calculated by combining the total number of working lines taking broadband (by definition, line capability will be above the target rate) and residual lines which are estimated as having a capability greater than 28.8kbps (based on sample measurement of data speeds encountered by customers of Eircom's dial-up services).

4. Public Payphones

This section provides figures on the number of USO payphones provided and the proportion in full working order during the reporting period.

5. Affordability of Tariffs

This section provides information on the number of bill complaints, and records the availability of the Vulnerable Users Scheme and support under the Department of Social and Family Affairs (DSFA) household benefit scheme.

6. Specific Measures for Disabled Users

This section records the services and equipment available for people with disabilities.

Appendix

All data relates to Eircom retail services only as the performance indicators are for the purpose of measuring compliance with the Universal Service Obligation, and have been supplied by Eircom in accordance with Regulation 10(1) of the USO Regulations.

Direct Access PSTN Provision

Table 1.1 – Provision of Access

	Q1 2006		Q2 2006		Q3 2006	
	Residential	Business	Residential	Business	Residential	Business
Supply time fastest 95% (in working days)	40	38	39	28	13	20
Supply time fastest 99% (in working days)	146	113	171	92	115	73
Percentage of requests completed by agreed date	88.13%	78.08%	86.23%	80.65%	88.92%	81.72%

Table 1.1 illustrates that for Q3 2006, 95% of requests for Residential PSTN access were completed within 13 working days, as opposed to 40 working days for Q1 2006.

In addition it also illustrates that 99% of Business PSTN access was completed within 73 working days in Q3 2006, as opposed to 113 working days for Q1 2006.

Finally, the table also illustrates that 88.92% of Residential requests and 81.72% of Business requests were completed by the agreed date with the customer for Q3 2006.

Fig 1.1 – Provision of Access

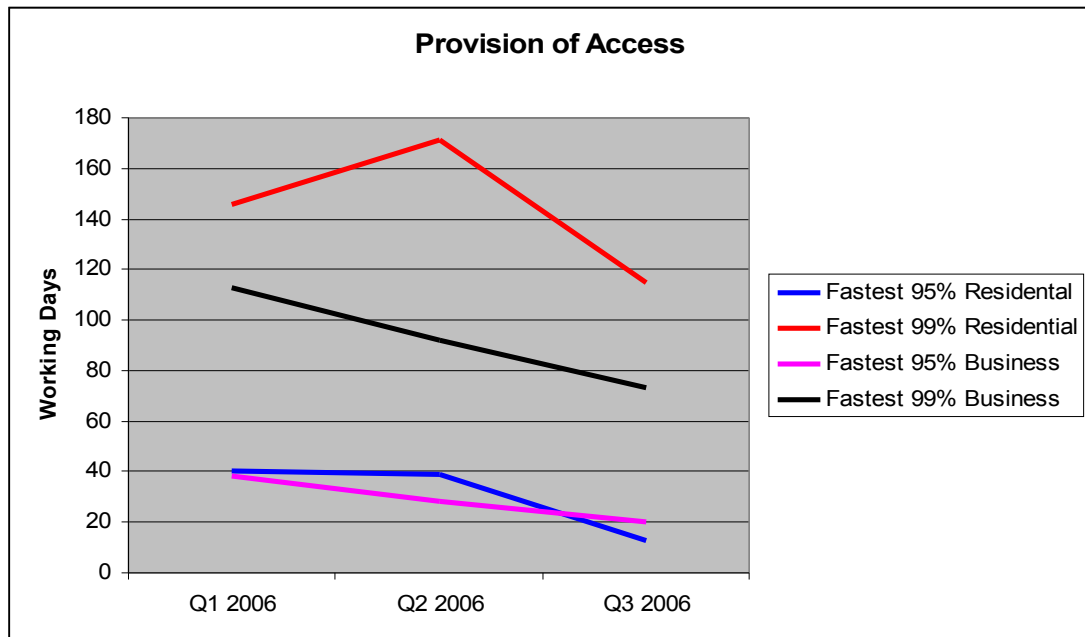


Fig 1.1 illustrates the provision of PSTN access in graphical format.

Table 1.2 – Age Profile of Completed Connections

	Performance Targets	Q1 2006		Q2 2006		Q3 2006	
		Residential	Business	Residential	Business	Residential	Business
Less than 4 weeks	60% of requests to be met	93.85%	91.98%	93.93%	94.20%	96.56%	95.23%
4 – 8 weeks	80% of requests to be met	96.09%	96.10%	96.16%	97.45%	98.01%	98.21%
8 – 13 weeks	90% of requests to be met	97.67%	98.22%	97.52%	98.72%	98.73%	99.13%
13 – 26 weeks	95% of requests to be met	99.43%	99.61%	99.14%	99.56%	99.48%	99.67%
26 – 52 weeks	All requests to be met	99.94%	99.95%	99.85%	99.92%	99.90%	99.95%
More than a year		0.06%	0.05%	0.15%	0.08%	0.10%	0.05%

Table 1.2 shows that over 90% of requests for installations were completed, for both business and residential customers, within 4 weeks for all three quarters which far exceeds the initial guidelines. However, a very small number of connections took over a year to complete.

Fig 1.2– Install Times for connections

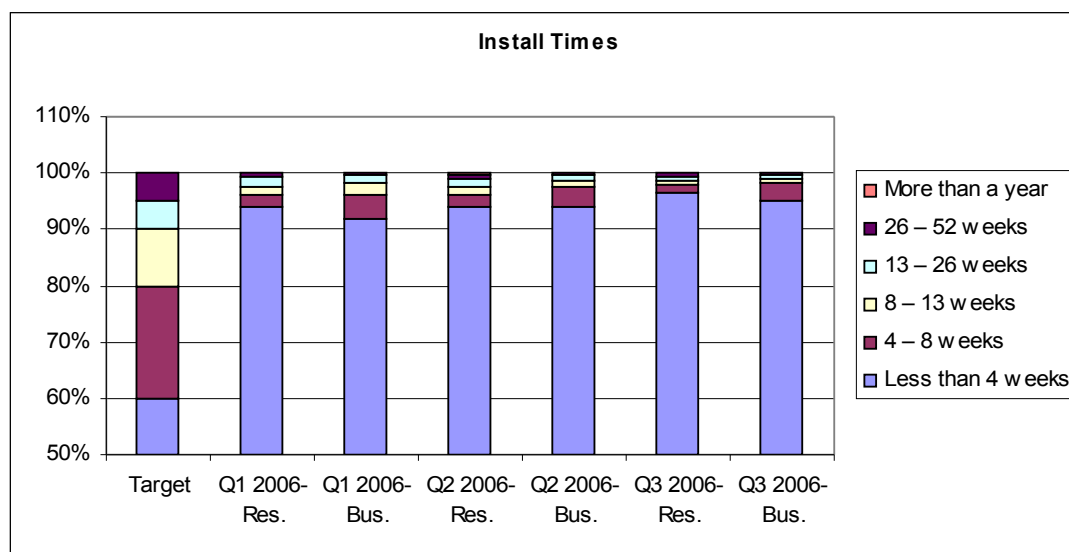


Fig 1.2 illustrates the data which has been displayed in Table 1.2

Direct Access PSTN Repair

Table 1.3 – Reported faults and fault repair time

	Q1 2006		Q2 2006		Q3 2006	
	Residential	Business	Residential	Business	Residential	Business
Proportion of faults per 100 lines	4.54	1.88	4.61	2.04	5.8	2.9
Fastest 80% completed (in working hours)	25.1	22.8	27.1	25.2	31.3	29.3
Fastest 95% completed (in working hours)	55.4	49.3	58.9	58.1	69.6	68.2

The above shows that the volume of faults reported is steadily increasing, while the time taken to complete repairs is also lengthening.

Fig 1.3 – Fault Repair Times

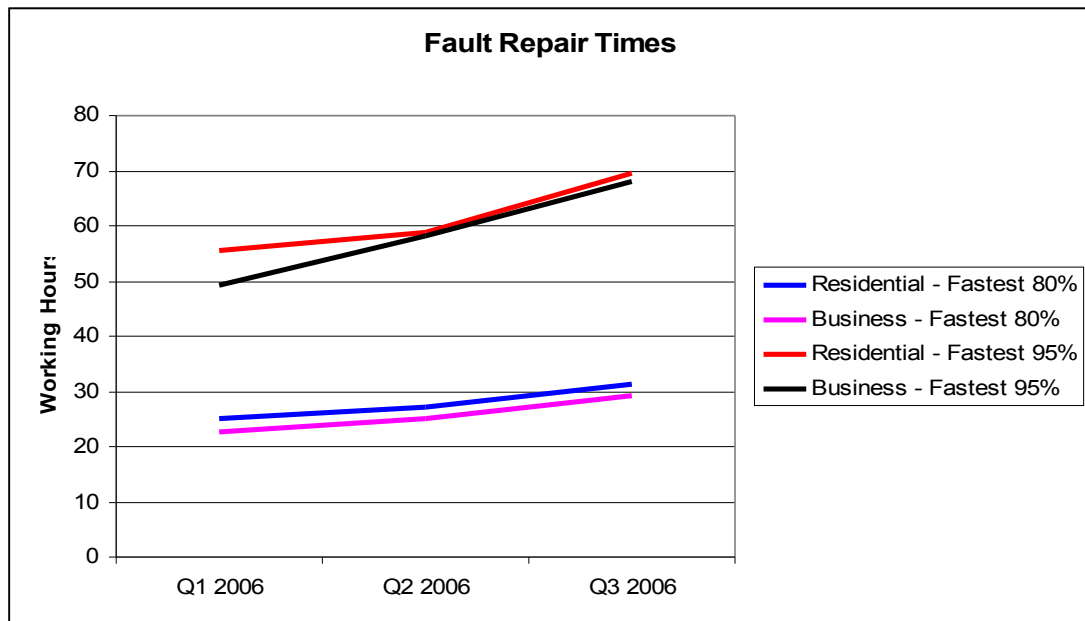


Fig 1.3 illustrates the fastest 80% and 95% of faults repaired which has been displayed in Table 1.3

Functional Internet Access

Table 1.4 – Percentage of lines capable of greater than 28.8kbps target (residential and business)

	Q1 2006	Q2 2006	Q3 2006
No of access lines capable of data speed of 28.8kbps or higher	94.40%	94.31%	93.94%
Performance target	93.5%	94%	94%

Public Payphones

Table 1.5 – Public payphones

	Q1 2006	Q2 2006	Q3 2006
Number of payphones for the period	4,074	4,073	4,073
Payphones in full working order	86.75%	90.09%	90.23%

Affordability of Tariffs

Table 1.6 – Affordability Metrics

	Q1 2006	Q2 2006	Q3 2006
Residential consumers who qualify for the DSFA free telephone rental allowance	Under the Department of Social and Family Affairs' Household Benefit Package, qualifying customers can avail of the telephone allowance which is valued at €24.70 per month		
Residential consumers subscribing to the Vulnerable Users Scheme	Customers can avail of the Vulnerable User Scheme which is targeted at users who need a telephone line but use it infrequently (e.g. emergency call use)		

Table 1.7 – Billing complaints

	Q1 2006		Q2 2006		Q3 2006	
	Residential	Business	Residential	Business	Residential	Business
Gross number of bill correctness complaints per 100 bills	0.11	0.02	0.05	0.01	0.04	0.01

Specific Measures for Disabled Users

For customers who are hearing impaired:

- Inductive Couplers,
- An amplified phone,
- Visual indicator when phone rings,
- The National Relay Service (Minicom),
- The STEP rebate scheme provides text telephone users with a rebate on text telephone charges.

For customers with limited dexterity or mobility:

- Speed dial and automatic redial buttons,
- Hands free facility,
- Special directory enquiries.

For customers with restricted vision:

- Braille billing,
- Standardised layout of key pads around central number (5) raised dot,
- Extra large, high contrast buttons.