



Commission for
Communications Regulation

Irish Communications Market

Quarterly Key Data Report

Data as of Q3 2010

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Explanatory Note to this Report

- Fixed broadband subscriptions have been changed from periods Q3 2008 to Q2 2010 due to operator revisions in the FWA subscriptions category. These revisions can be accessed on www.comstat.ie
- Total fixed line traffic has been revised from 1,824,359,187 to 1,818,043,148 for Q2 2010 due to an operator revision.
- Fixed line revenues have been revised for the periods Q1 2008 to Q2 2010. For Q2 2010 fixed line revenues have been changed from €479,394,600 to €486,319,112. Therefore, overall total electronic communications revenues have also been revised from €944,174,887 to €951,099,399 for the period Q2 2010. These revisions can be also be accessed on www.comstat.ie
- As per ComReg’s revised Q2 2010 report (10/73R), mobile broadband data has been revised for the periods Q1 2009 to Q1 2010.

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Summary

Total broadband subscriptions reached almost 1.55 million this quarter. Overall industry revenues increased this quarter (driven by increases in fixed line and mobile revenues), up for the second quarter in a row. Overall fixed traffic volumes were down slightly this quarter. Presented below is a tabular summary of this quarterly report.

Irish Quarterly Communications Market Data Q3 2010				
	Q3'10	Q2'10	Quarterly Change	Annual change
Total Market Revenues	€968,105,317	€951,099,399	+1.8%	-2.9%
Fixed Line Revenues	€498,195,003	€486,319,112	+2.4%	-1.5%
Mobile Revenues	€423,405,893	€417,903,297	+1.3%	-5.0%
Broadcasting Revenues	€46,504,420	€46,876,990	-0.8%	+2.6%
Total Voice Traffic (Minutes)	4,444,959,932	4,468,195,054	-0.5%	-1.7%
Fixed Voice Traffic (Minutes)	1,781,819,321	1,818,043,148	-2.0%	-10.4%
Mobile Voice Traffic (Minutes)	2,663,140,610	2,650,151,906	+0.5%	+5.1%
Internet Subscriptions	1,610,189	1,582,343	+1.8%	+7.8%
Fixed Broadband Subscriptions	1,008,079	996,480	+1.2%	+7.6%
Total Broadband Subscriptions	1,548,625	1,505,100	+2.9%	+15.8%
Narrowband Subscriptions	61,564	77,243	-20.3%	-60.6%
Mobile Broadband Subscriptions (HSDPA)	540,546	508,620	+6.3%	+35.0%

- Overall electronic communications network and service revenues at the end of September 2010 were just over €968 million for the quarter. Industry revenues increased by 1.8% this quarter.
- Total voice traffic minutes decreased by 0.5% this quarter to just over 4.44 billion minutes. As per last quarter, mobile minutes form the majority of voice minutes at 59.9%, with fixed minutes representing the remaining 40.1%.
- This quarter, total internet subscriptions increased by 1.8% to reach 1,610,189. Fixed broadband subscriptions increased in the quarter by 11,599 to reach 1,008,079 subscriptions.
- Falls in narrowband internet subscriptions continued this quarter, declining by 20.3% and 60.6% since Q3 2009. There are now a total of 61,564 narrowband subscriptions in Ireland as consumers continue to migrate to broadband and away from slower dial-up technologies.

- Broadband subscriptions (fixed and mobile) continued to increase, to reach a total of 1,548,625. This is a 2.9% increase on Q2'10. The fixed broadband per capita penetration rate reached 22.6% in Q3 2010. The broadband per capita penetration rate (including mobile broadband) in Q3 2010 was 34.7%.
- Although coming from a low base, LLU lines experienced a significant increase this quarter (up 71%). While full LLU lines declined slightly (down 4%), shared lines increased significantly (up 249%). There were a total of 37,778 LLU lines in Q3 2010.
- At the end of September 2010 there were 5,161,992 mobile subscriptions in Ireland, an increase of 2.1% since Q3 2009. Mobile penetration, was 115.8% (up from 113.4% in Q3 2009) including mobile broadband and 103.6% (down from 104.5% in Q3 2009) excluding mobile broadband.

Notes to data:

- Aggregated SB-WLR Performance Statistics, as supplied by Eircom, are published in accordance with ComReg Decision Notice (07/61) Section 6.6 (vii) in the appendix.
- In this report Irish population estimates from the Central Statistics Office (CSO) of 4,459,300 for April 2009 are used for the period Q3 2010. Population data is used to calculate per capita mobile and broadband penetration in Ireland. A household number of 1,599,500 million (as of Q4 2008) from the CSO is also used. This household data is based on estimates from the Quarterly National Household Survey (QNHS). ComReg intends to revise the household figure on an annual basis using data from the QNHS.
- A number of external sources are used for international comparisons. These include the Central Statistics Office, EU Commission, and Teligen.
- In most cases data has been rounded to one decimal place in this report.
- Not all charts in this report sum exactly to 100% due to rounding.
- While quarter on quarter comparisons are made in the report, definitive conclusions with regard to trends cannot be drawn and year on year comparisons are used to improve the reliability of the analysis.
- Further explanations and descriptions of data supplied in this report can be found in the accompanying explanatory memorandum 10/106a.
- Extracts of data used in this report can be downloaded at www.comstat.ie

Data previously published may have been amended since publication. Any such amendments are noted in the explanatory note above.

1. Overall Market Data

Data presented in this report is based on questionnaires completed by authorised operators for the period from 1st July 2010 to 30st September 2010. The report is based on submissions from 57 active operators¹.

1.1 Number of Authorisations

Figure 1.1.1 - Total Number of Authorisations

Total Authorisations	November 2010
No. of fixed and wireless authorisations	377
No. of mobile telephony authorisations	7
No. of broadcasting authorisations (incl. Cable TV, MMDS, Deflectors)	87
Total Number	471

Before providing networks or services to third parties, operators are required to submit a notification to ComReg which is added to a central register of authorised operators. At the date of publication there were 471 authorised undertakings in Ireland.

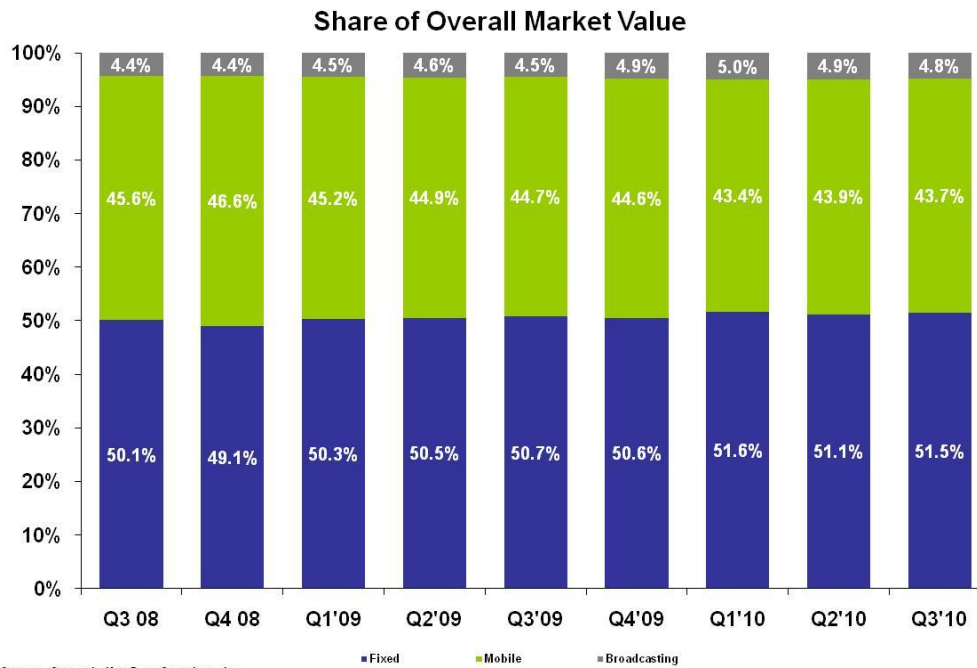
It should be noted that the list above refers to the number of general authorisations granted by ComReg under the European Framework for Authorisations, and does not necessarily reflect the total number of commercially active organisations or entities currently operating in the market. The total includes a number of undertakings who are authorised to use licence-exempt spectrum for the provision of services.

¹ ComReg uses a revenue threshold to determine which operators are to be included in this report.

1.2 Overall Electronic Communications Revenues²

Data presented in Figure 1.2.1 shows the proportion of industry revenue attributable to the provision of fixed line, mobile and cable broadcasting services.

Figure 1.2.1 – Fixed, Mobile & Broadcasting as a % of Total Revenues



According to Central Statistics Office data, Ireland’s Gross National Product at the end of Q2 2010 was approximately €41 billion. Based on Q2 2010 revenues reported to ComReg by operators in the Irish communications sector, these revenues were approximately 2.3% of GNP in that quarter.

Overall electronic communications network and service revenues at the end of September 2010 were just over €968 million. This was a 1.8% increase on the previous quarter. However, since Q3 2009, industry revenues, as reported to ComReg, have fallen by 2.9%. Total annual revenues for the periods including Q4 2009 to Q3 2010 were approximately €3.84 billion.

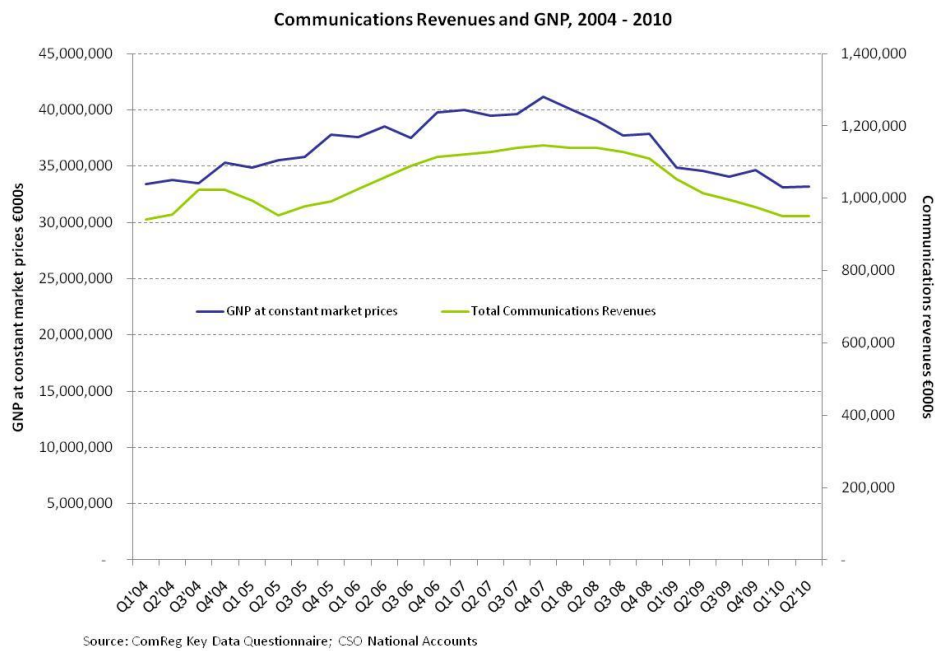
While both fixed and mobile sectors experienced increases in revenues this quarter, the broadcasting sector saw a slight decline. Fixed revenues increased by 2.4%, mobile revenues increased by 1.3%, but broadcasting network revenues declined by 0.8%. It should also be noted that the broadcasting network revenues in this report exclude Sky Ireland’s satellite revenues and all content related revenues.

² Further detail on terms and definitions - ComReg Doc. 10/106a Explanatory Memorandum.

Fixed line revenues accounted for 51.5% of total revenues, a slight increase in market share since the last quarter. The mobile industry’s share of total revenues (43.7%) decreased slightly this quarter, while broadcasting revenue’s market share also declined to 4.8%.

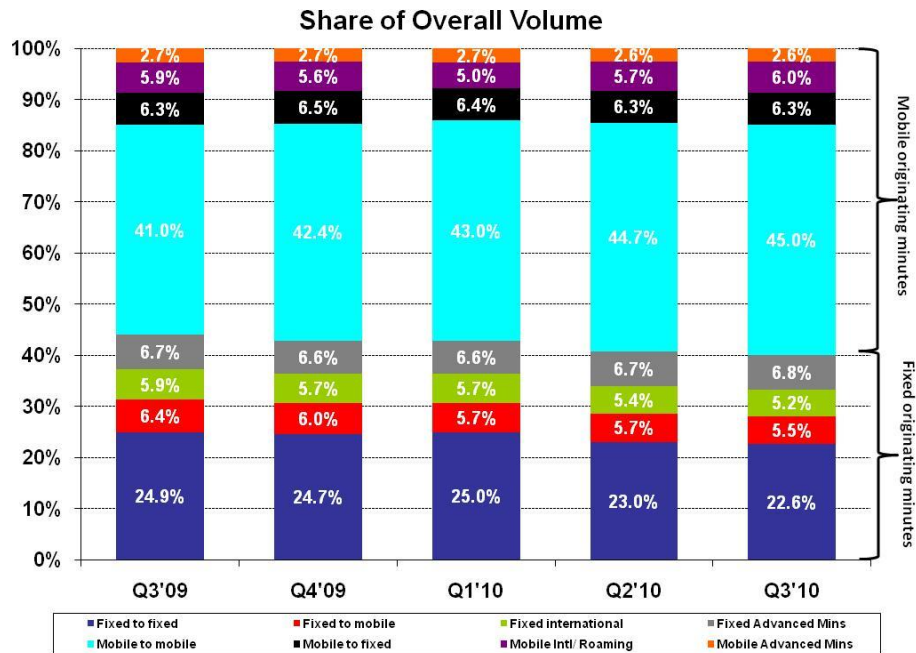
Figure 1.2.2 shows that over the last 6 years changes in communications revenues have generally mirrored economic output.

Figure 1.2.2– Communications Revenues and GNP



1.3 Overall Call Volumes

Figure 1.3.1 - Share of Total Voice Call Volumes (Minutes)³



Source: Quarterly Key Data Questionnaire

Figure 1.3.1 profiles volumes of originating voice calls by call type on both fixed and mobile networks on a quarterly basis. Voice minutes for Q3 2010 totalled just over 4.44 billion minutes. Total voice minutes declined by 0.5% from the previous quarter and have fallen by 1.7% since Q3 2009.

Mobile originating voice minutes accounted for 59.9% of all voice minutes in Q3 2010 while traffic originating on a fixed line network accounted for the remaining 40.1% of all voice minutes. Figure 1.3.2 shows the total voice traffic in Ireland at the end of Q3 2010.

Figure 1.3.2 – Total Voice Traffic

	Q3'10 Mins	Q2'10 – Q3'10 Growth	Q3'09 – Q3'10 Growth
Fixed voice minutes	1,781,819,321	-2.0%	-10.4%
Mobile voice minutes	2,663,140,610	+0.5%	+5.1%
Total voice minutes	4,444,959,932	-0.5%	-1.7%

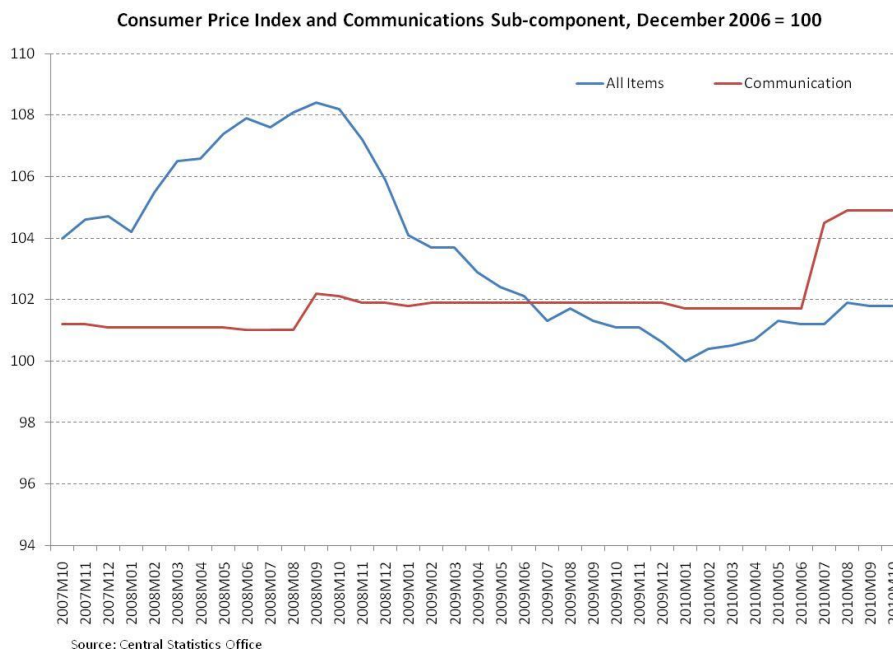
³ Fixed advanced minutes include premium rate services minutes, freephone minutes, VoB minutes, payphone minutes, operator services minutes, national and international virtual private network minutes. Mobile advanced minutes include premium rate services minutes and other mobile minutes such as voicemail, DQ, call completion minutes etc.

1.4 Communications and the Consumer Price Index

Figure 1.4.1 shows the monthly change in the Consumer Price Index (CPI) and the communications sub-component from October 2007 to October 2010. The CSO weights communications as 3.34% of the total CPI.

As the recession worsened, overall prices fell more quickly than communications prices. However, since the beginning of 2010 overall prices have been rising and between July and August 2010 communications costs also increased. Overall communication costs have increased by just over 3% since the start of 2010, while overall prices have risen by approximately 1.8% in the same period. The communications price increase is primarily due to increased charges by Eircom and mobile operators⁴.

Figure 1.4.1 – Consumer Price Index and Communications Sub-Component

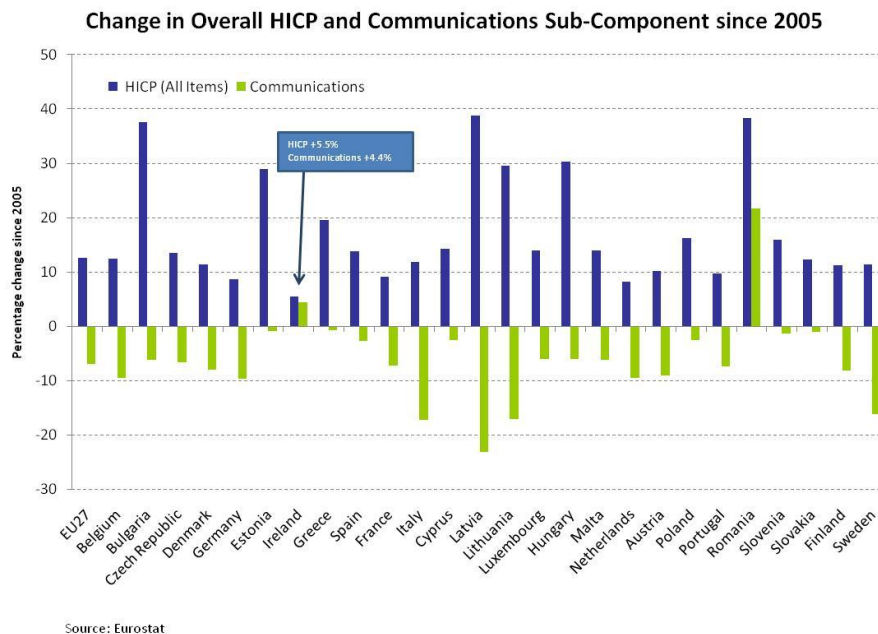


⁴ O2 increased call connection charges from 5 cent to 9 cent on their pre-paid packages. For post-paid plans, the out of bundle or non-inclusive per minute costs are increasing by 2 cent. Text charges will increase from 10c to 11c. Meteor has announced a similar increase which came into effect as of August 12th and will therefore have an effect on the cost of the telecommunications basket. From Thursday, 1st July 2010, Eircom introduced call rounding for all "out of bundle" minutes. All minutes outside of package/bundle minutes are rounded up to the next minute instead of being billed on a per second basis. A call set up fee replaces the minimum call fee for customers on "small business" packages. The existing minimum fee charge of (5.33c ex. VAT) was replaced by a fixed call set up charge of (4.80c ex. VAT).

Figure 1.4.2 compares the overall Harmonised Index of Consumer Prices (HICP) and the telecommunications basket for European countries including Ireland. The HICP is an indicator of inflation and price stability for the European Central Bank (ECB). It is a consumer price index which is compiled according to a methodology that has been harmonised across EU countries. The euro area HICP is a weighted average of price indices of member states who have adopted the euro.

On average, European countries have seen telecommunications prices fall since 2005, while overall prices have risen. For Ireland, the data shows that telecommunications prices have increased by 4.4% over the period while overall prices have increased by 5.5%.

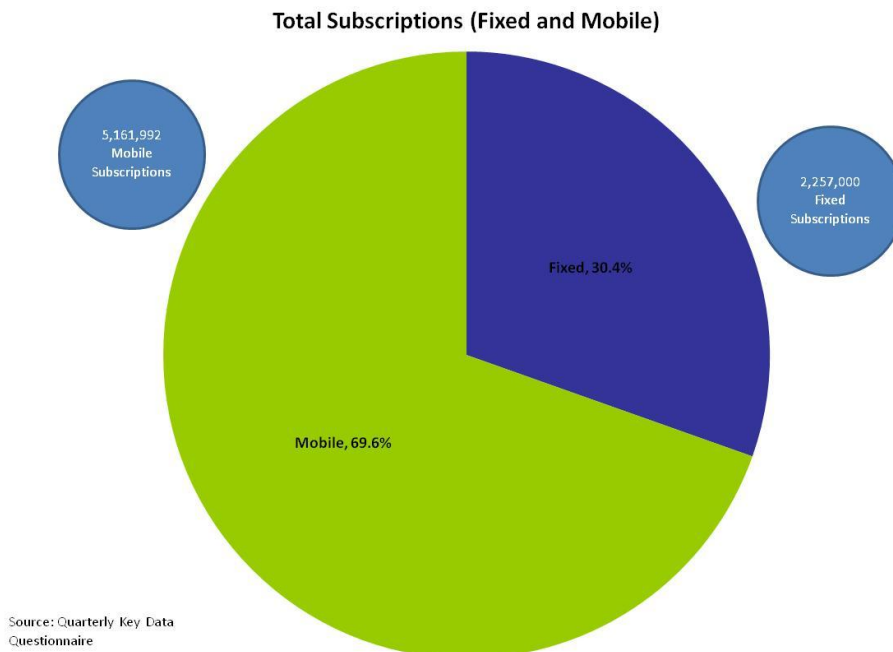
Figure 1.4.2 – European Harmonised Index of Consumer Prices



1.5 Fixed and Mobile Market Retail Voice, Internet and TV Subscriptions

Figure 1.5.1 shows the total number of mobile subscriptions (also reported in section 4.1) and the estimated number of fixed subscriptions to voice, internet and TV services in Ireland as of Q3 2010. This chart is new and is intended to provide an idea of the total number of voice, TV and internet subscriptions in Ireland across both residential and business customers and across both fixed and mobile networks. Mobile TV subscriptions are not included. Customers purchasing either a single subscription or more than one subscription (as part of a bundle) are included in the fixed subscriptions category. The mobile market represents approximately 69.6% of all subscriptions with fixed line subscriptions representing the remaining 30.4%. Please note that it is possible that a customer may have more than 1 subscription, particularly where a mobile customer has more than 1 SIM card or in the case of a business customer with multiple subscriptions across several offices.

Figure 1.5.1 – Total Voice, Internet and TV Subscriptions (Fixed and Mobile), Q3 2010



2. Fixed Market Data

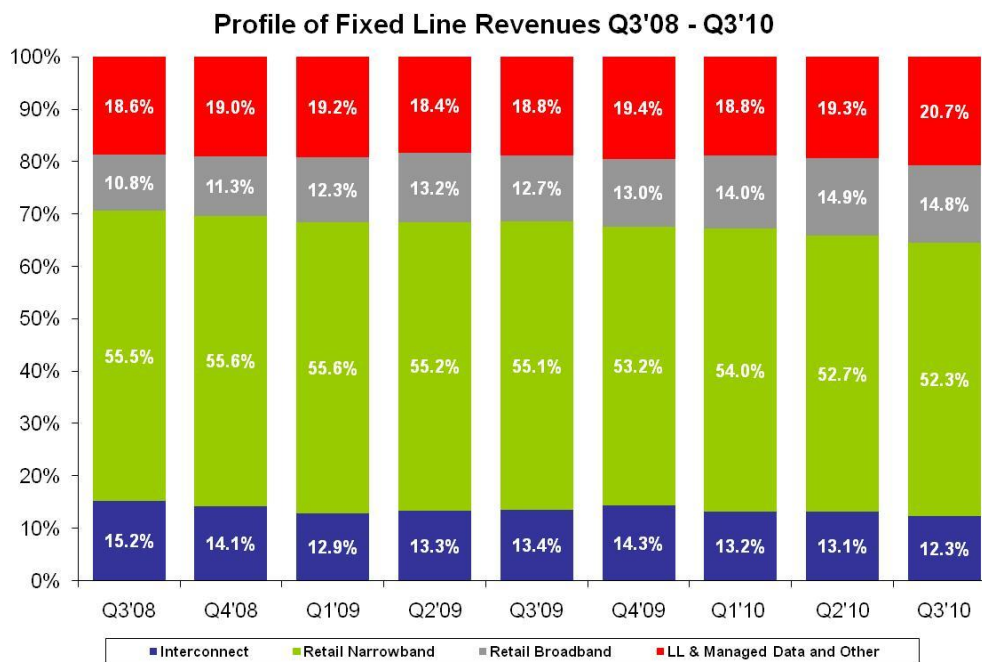
2.1 Total Fixed Line Revenues

Figure 2.1.1 shows the profile of fixed line wholesale and retail revenues in Ireland over the last two years. Total fixed line revenues at the end of September 2010 were just under €500 million. This is a 2.4% increase on Q2 2010 revenues but a 1.5% decline on Q3 2009 revenues, which were over €505 million.

While revenues from interconnect (down 4.3%) have fallen this quarter, revenues from leased lines, managed data and other advanced data services (up 9.6%), narrowband (up 1.7%) and broadband services (up 1.8%) have increased.

This quarter the proportion of fixed line revenues attributable to leased lines, managed data and other advanced data services increased by 1.4 percentage points. Broadband revenues' market share decreased by 0.1 percentage points, interconnect revenues share decreased by 0.9 percentage points, while the proportion of retail narrowband fell by 0.4 percentage points.

Figure 2.1.1 – Profile of Fixed Line Revenues

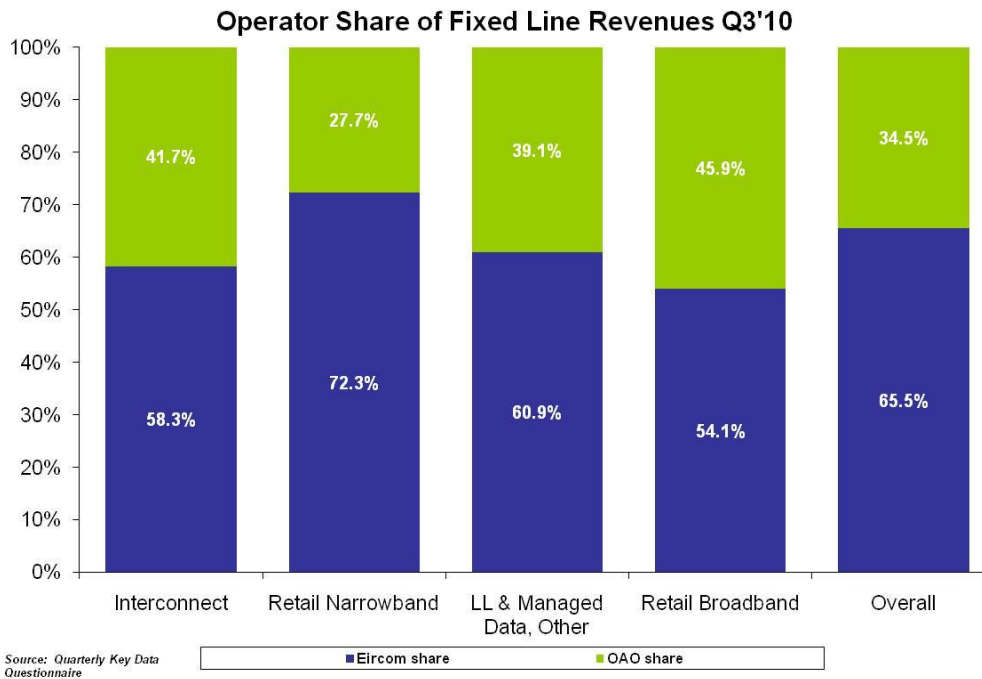


2.1.1 Authorised Operators’ Share of Overall Fixed Line Revenues

Figure 2.1.1.1, below, shows the market shares of the incumbent and other authorised operators (OAOs) in each of the fixed line service categories mentioned in figure 2.1.1. Market shares are grouped within a number of revenue categories to link related services and are based on both retail and wholesale revenues; this classification does not reflect the specific markets identified in ComReg’s Market Analysis process.

This quarter Eircom made gains relative to OAOs in its market share of retail broadband, narrowband and interconnect revenues but lost market share in the leased line, managed data and other services revenue category. Overall, Eircom’s market share of total fixed line revenues was 65.5% in Q3 2010.

Figure 2.1.1.1 – Operator Share of Fixed Line Revenues⁵



⁵ Eircom’s retail broadband share includes DSL, FWA and Satellite revenues.

Eircom’s overall share of fixed line market revenue has declined this quarter to 65.5%. Figure 2.1.1.2, below, shows Eircom’s market share, rounded to the nearest percentage point, on a quarterly basis from Q3 2008 to Q3 2010.

Figure 2.1.1.2 – Eircom’s Market Share

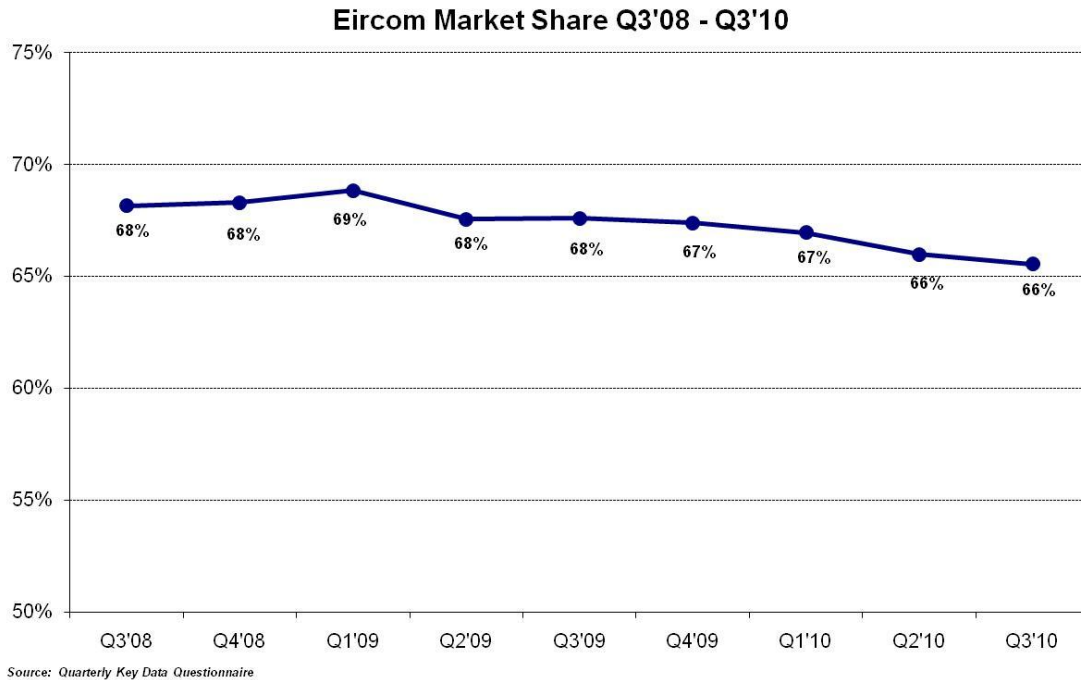
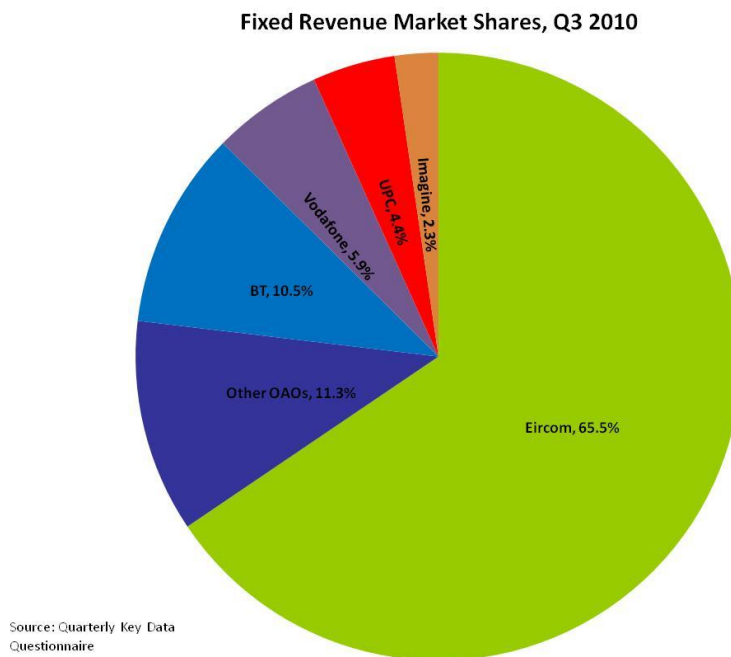


Figure 2.1.1.3 below outlines revenue market shares of the fixed market (of interconnect, retail narrowband, retail broadband and leased line, managed and other data revenues) held by the incumbent fixed line operator, OAOs with a minimum 2% market share, and all other OAOs. When making comparisons, it is important to note that the market shares presented below are based on shares across all fixed wholesale and retail revenue streams as some operators may not offer products and services across all segments of the market. In Q3 2010, after Eircom, the largest revenue earning operator in the market with 65.5% market share, ComReg estimates that the next four largest operators (BT, Vodafone (fixed only), UPC and Imagine) contribute a further 23.1% of industry revenue. This chart is presented as an additional analysis of the fixed market and should not be interpreted as a definitive statement of retail revenue market shares.

Figure 2.1.1.3 – Fixed Revenue Market Shares



2.2 Fixed Line Access Paths

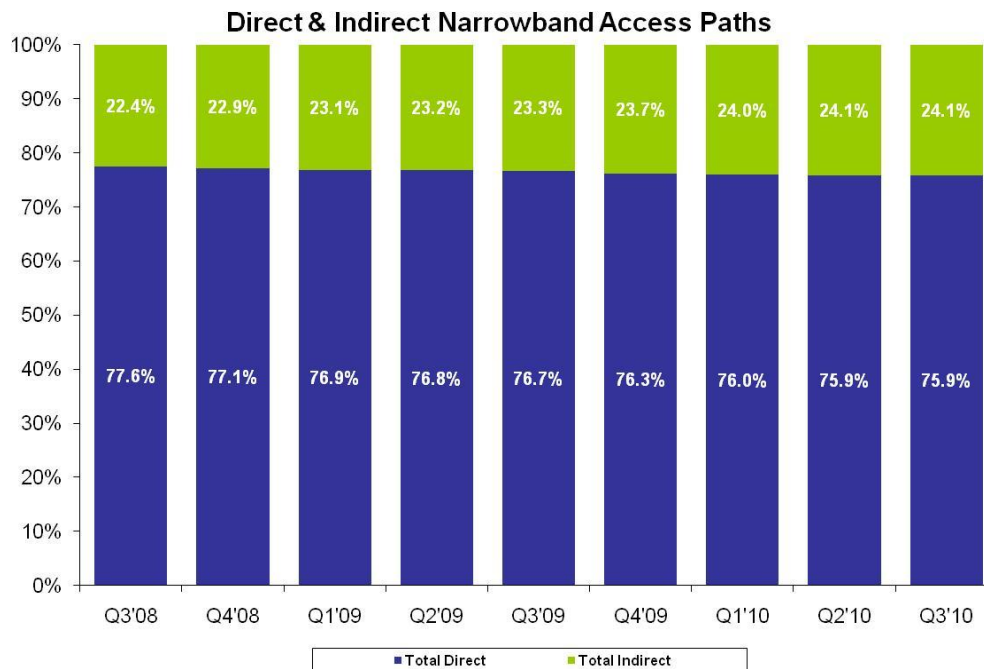
2.2.1 Access Paths

Figure 2.2.1.1 presents the total number of narrowband copper fixed access paths (PSTN and ISDN) broken out by direct and indirect access⁶. These paths are usually used for voice services and internet access. There were just over 1.88 million direct and indirect PSTN and ISDN access paths in the Irish market in Q3 2010.

This represents a decline of 4.1% since Q3 2009 and 1.3% in this quarter. This reduction in demand for fixed lines could be due to a number of reasons such as an increase in the number of business failures and exits, and fixed line disconnections due to emigration and reductions in consumer spend in difficult economic times.

In Q3 2010, indirect access accounted for 24.1% of all access paths in the fixed market, unchanged from the previous quarter.⁷ While this chart shows the number of narrowband only access paths in Ireland, voice and data can also be supplied by other means such as broadband. Details on the broadband market in Ireland can be found in chapter 3 of this report.

Figure 2.2.1.1 – Direct & Indirect Narrowband Fixed Access Paths



Source: Quarterly Key Data Questionnaire

⁶ Indirect access paths relate to telephone lines provided to customers by means of carrier pre-select only or wholesale line rental. Carrier pre-select allows the user to receive all or a portion of calls from one provider and line rental from another provider (usually Eircom). Wholesale line rental (also known as single billing) allows the user to receive every aspect of telephone service, including all calls and line rental from one single supplier.

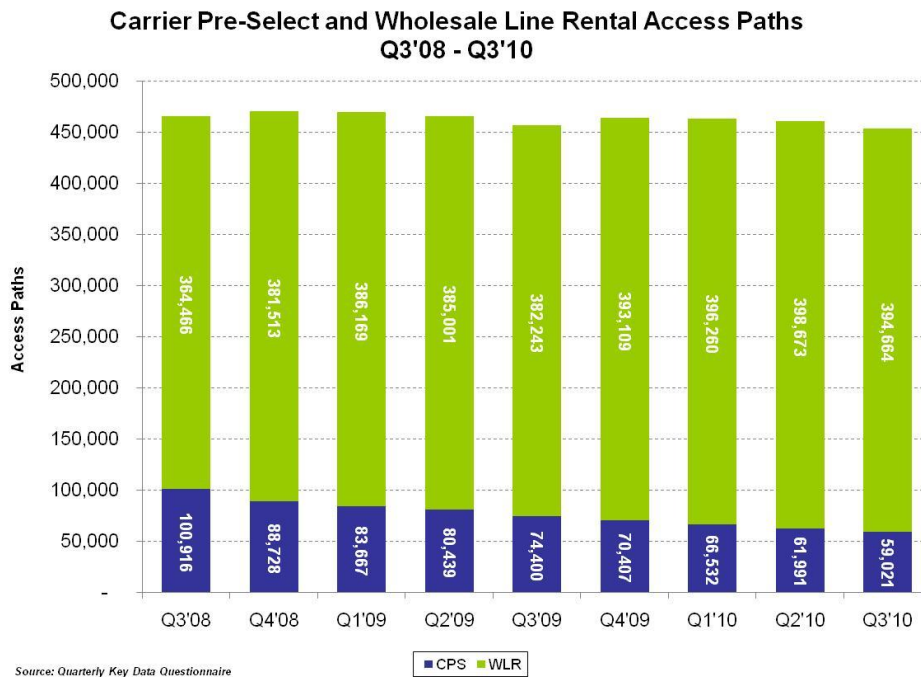
⁷ Access paths are not synonymous with access lines as for example in the case of ISDN paths, there may be more than 1 path provided via a single ISDN line.

2.2.2 Indirect Access Paths

Figure 2.2.2.1 illustrates the overall number of PSTN and ISDN paths provided by means of either Carrier Pre-Selection (CPS) only or Wholesale Line Rental (WLR). In Q3 2010, there were 453,685 indirect access paths in Ireland. The number of indirect access paths fell by 1.5% this quarter and fell by 0.6% in the year to Q3 2010.

The data indicates that OAOs continue to migrate their customer base to single-bill services, i.e. WLR rather than CPS (i.e. calls only) services to customers. WLR managed by OAOs now accounts for 87.0% of indirect access paths compared to 78.3% in Q3 2008. The share of CPS only indirect access paths has declined by 8.7 percentage points in the last two years.

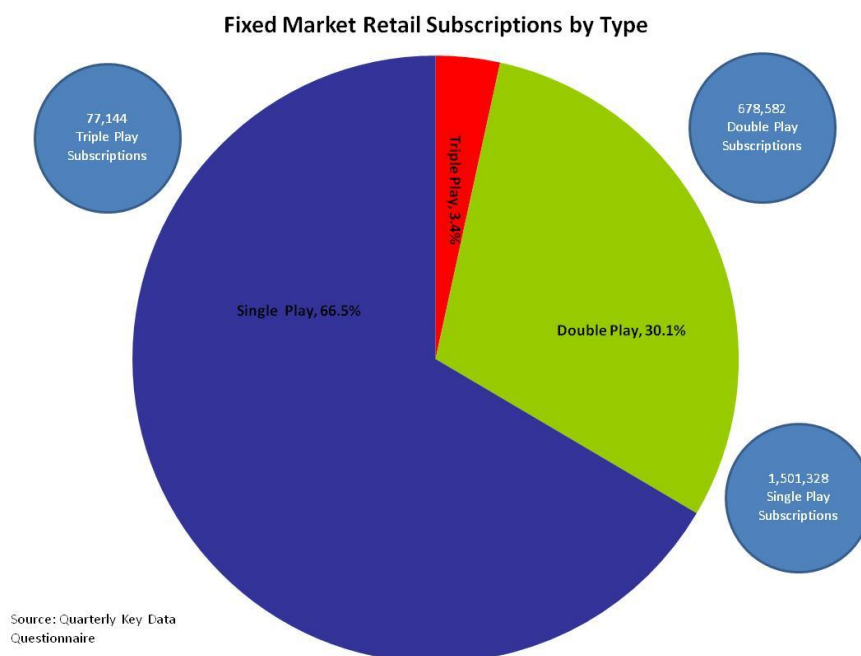
Figure 2.2.2.1 – Narrowband Indirect Access Paths



2.2.3 Fixed Market Retail Subscriptions by Type

Figure 2.2.3.1 shows the estimated proportion of retail customers or subscriptions to fixed line services (mobile networks are excluded) broken out by those with a single service and those taking a bundle of two or more services as of Q3 2010 (subscriptions mean a customer with at least one contract with an electronic communications service provider)⁸. It is estimated that there were almost 2.26 million fixed market retail subscriptions in Q3 2010 across both business customers and residential consumers (a business customer may have multiple subscriptions). 66.5% of these subscriptions were single play, 30.1% double play (a bundle of two services) and 3.4% triple play (a bundle of 3 services).

Figure 2.2.3.1 – Fixed Market Retail Subscriptions by Type



⁸ Double play subscriptions can refer to either fixed telephony and internet or television or mobile telephony; television and the internet; mobile telephony and internet or television subscriptions. Triple play subscriptions can refer to fixed telephony and internet and television; fixed telephony and mobile telephony and internet; fixed telephony and mobile telephony and television; or, mobile telephony and internet and television subscriptions.

2.3 Fixed Voice Call Volumes

Fixed voice traffic in Q3 2010 was just over 1.78 billion minutes, which was a 2.0% increase on Q2 2010 and a fall of 10.4% since Q3 2009. The volumes for domestic, international and minutes to mobiles have fallen this quarter, while other/advanced minutes have increased this quarter. Factors such as reductions in consumer spending in more difficult economic conditions, and an increase in the use of mobile phones, among others, may be contributing to the general overall voice traffic decline, as noted under 2.2.1 in relation to the fall in the number of fixed access paths.

International minutes decreased by 3.9%, domestic minutes declined by 2.2% and minutes to mobiles fell by 3.1%. Other/advanced minutes increased by 1.2%. Voice over broadband (VoB) minutes grew by 10.4% in Q3 2010 and now account for approximately 4.6% of total fixed voice minutes up from 4.1% in Q2 2010. There were an estimated 130,000 managed VoB subscriptions in Ireland in Q3 2010 and over 82 million managed VoB minutes, suggesting that VoB is growing in popularity. The number of VoB subscriptions stated above is likely to underestimate the level of VoB usage in Ireland. VoB subscriptions and minutes quoted in this report represent managed VoB data (for example by Eircom and other providers such as Blueface) and do not include unmanaged VoB services by providers such as Skype.

Domestic minutes now account for 56.4% of all fixed traffic, down from 56.5% last quarter. International outgoing minutes have a 13.0% market share of all fixed traffic, down from 13.2% last quarter. The market share of fixed to mobile minutes decreased by 0.2 percentage points and now represents 13.7% of all fixed voice minutes. Other/advanced minutes (which include VoB minutes and premium rate calls) have increased by 0.5 percentage points this quarter.

Changes in the volumes and profile of fixed line traffic will continue to be monitored by ComReg for evidence of changes in fixed line usage, such as increased fixed-mobile substitution and voice over broadband substitution. Figures 2.3.1 and 2.3.2 illustrate trends in fixed voice call minutes since Q3 2008.

Figure 2.3.1 – Fixed Voice Call Volume (Minutes)⁹

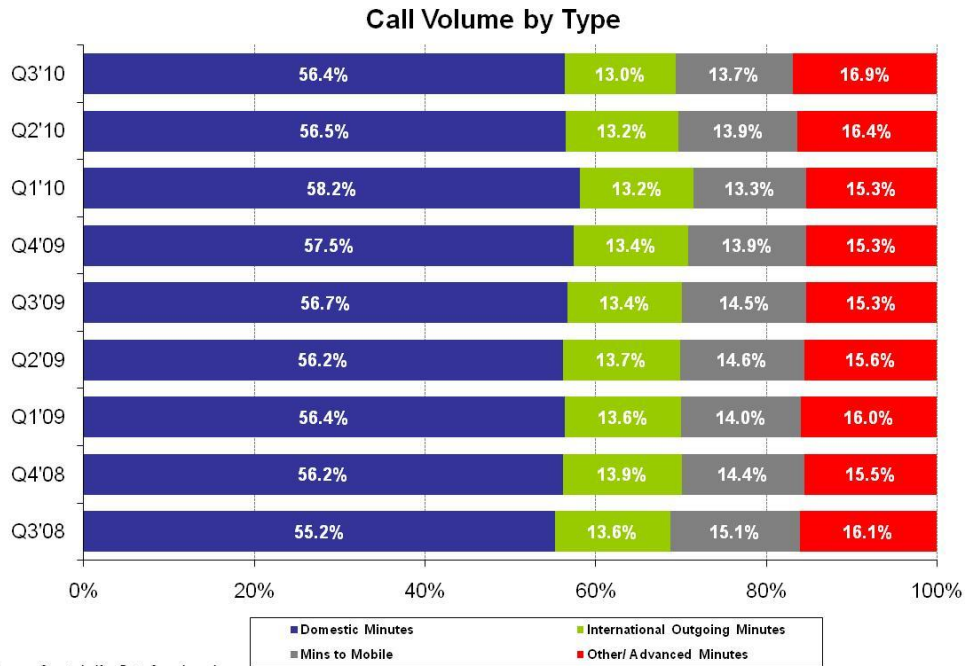
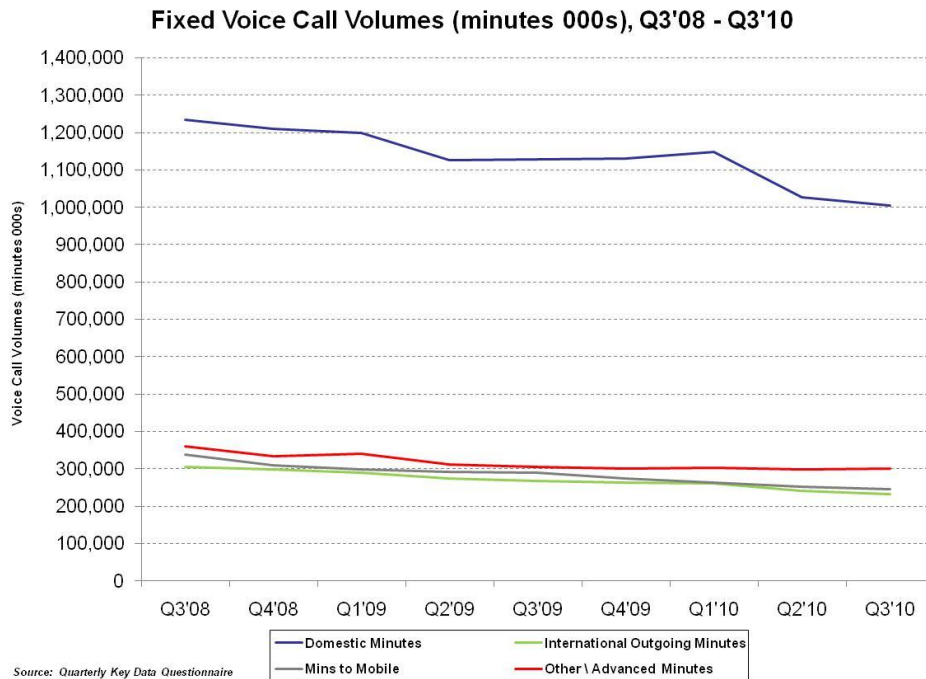


Figure 2.3.2 – Fixed Voice Call Volume (Minutes)



⁹ Domestic Calls include local & national calls. Advanced service and other minutes include minutes to premium rate numbers, freephone numbers, callsave, operator services, VoB minutes, VPN minutes, payphones and other services.

2.4 PSTN Pricing Data

ComReg uses independently-collated Teligen data using an OECD-approved methodology to examine the relative costs of a number of specific baskets of national and international telecoms services for both residential and business users. The data presented includes EU countries for which data is available¹⁰.

Using this methodology, data is presented using USD (\$) converted to Purchasing Power Parities (PPPs). The latter provides an indication of the cost of telecoms services in countries analysed in relation to the cost of all other products and services. The basket methodologies are reviewed and revised periodically, the latest of which was in early 2010.

For the PSTN baskets, only the incumbent operator is covered. Discounts are incorporated and only tariffs presented as current tariffs on the operator web pages are considered. Nonrecurring charges (installation of a service) are discounted over 5 years and other fixed costs are included such as line rental and any other additional charges. Fixed, mobile and international calls are included in the baskets. For more detailed information please see ComReg's accompanying Memorandum, document 10/106a.

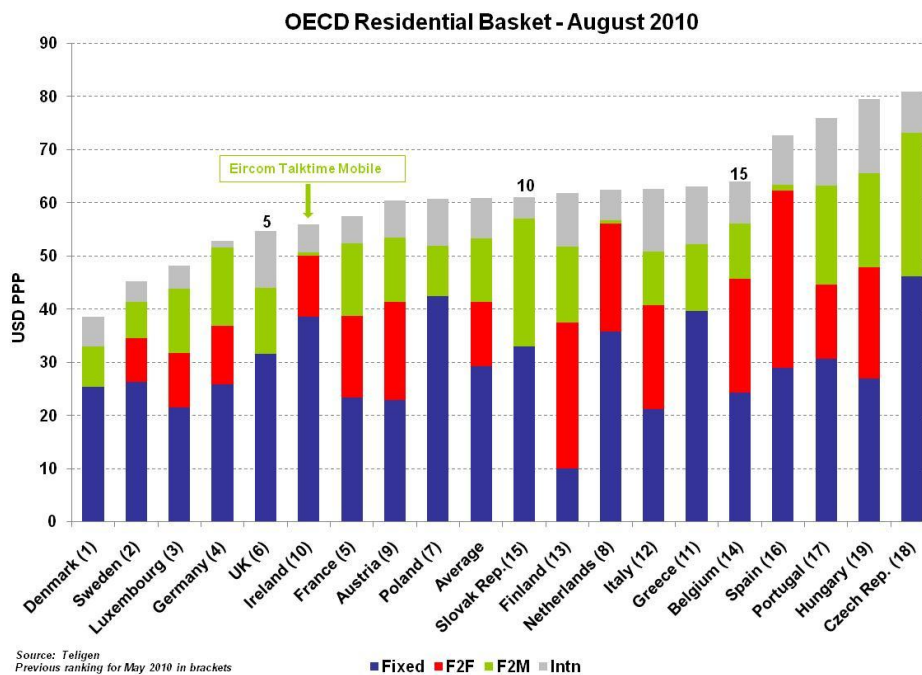
¹⁰ This will be determined by whether the EU country is also an OECD member.

2.4.1 OECD Residential PSTN Basket

Figure 2.4.1.1 illustrates Ireland’s ranking, alongside another 18 EU countries, for residential calls, based on a basket of 140 calls per month. This chart is based on a comparison of the cheapest incumbent package available for a specific customer usage profile. In many cases this will be a bundled service which will include both line rental and a “bundle” of call minutes for a fixed monthly charge.

It should therefore be noted that the “fixed” element in this basket is not an indication of the cost of basic line rental. In August 2010 Ireland ranked in 6th position, four places ahead of the average of the benchmarked countries in terms of the most competitive pricing for this basket. The Irish package used for this comparison was Eircom Talktime Mobile, which was 8.2% cheaper than the average for the European countries charted.

Figure 2.4.1.1 - OECD Residential PSTN Basket – August 2010¹¹



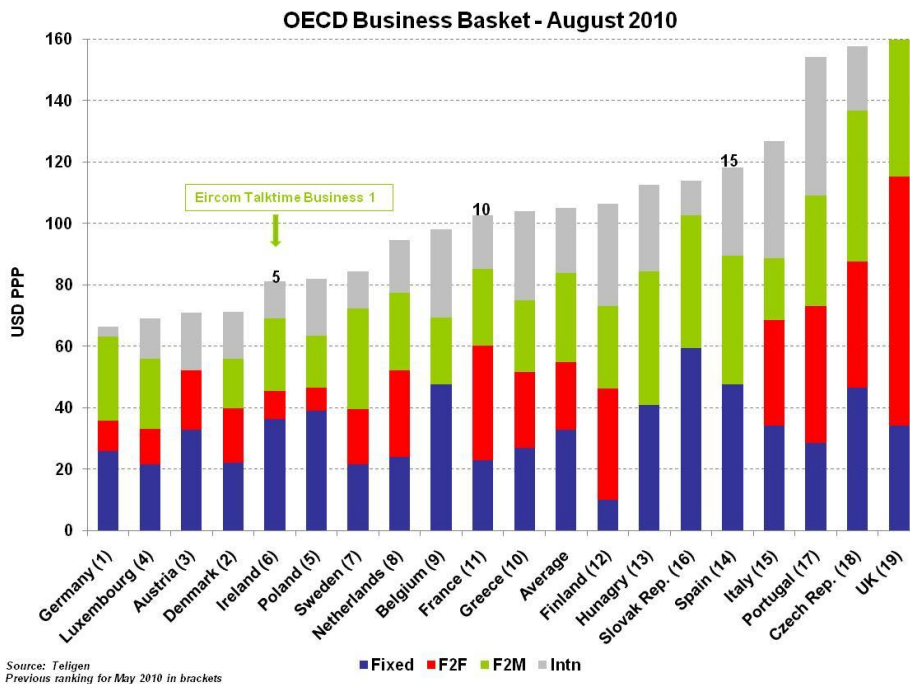
11 Residential tariffs include VAT. VAT rates vary between member states.

2.4.2 OECD Business PSTN Basket

Figure 2.4.2.1 illustrates Ireland’s ranking, alongside another 18 EU countries, for business calls, based on a basket of 260 calls per month, which also includes a fixed charge for access as part of a bundled service.

It should be noted that the “fixed” element in this basket is not an indication of the cost of basic line rental. Ireland is approximately 22.8% lower than the average of the 19 countries benchmarked and is in 5th position, 7 places ahead of the group average. The Irish package used for this comparison was Eircom’s Talktime Business Level 1.

Figure 2.4.2.1 - OECD Business PSTN Basket – August 2010



3. Internet and Broadband

3.1 Total Internet Subscriptions

As at the end of September 2010, there were just over 1.6 million active internet subscriptions in Ireland. This is a 1.8% increase on the previous quarter and a 7.8% increase on September 2009. Narrowband subscriptions have continued to decline. In Q3 2010, 15,679 narrowband subscriptions were either switched to a broadband connection or cancelled. This represents a 20.3% decline since the last quarter and a fall of 60.6% since September 2009. Narrowband now accounts for just 3.8% of all internet subscriptions in Ireland compared to 4.9% last quarter and 10.5% in Q3 2009.

DSL, mobile, and cable broadband subscriptions increased this quarter, while FWA and fibre/satellite subscriptions declined this quarter. DSL subscriptions increased marginally by 0.3% (up 5.1% since September 2009). Cable subscriptions grew by 8.5% (up 36.5% since September 2009). Mobile broadband subscriptions increased by 6.3% (up 35% since September 2009). In absolute terms, there was a net increase of 2,439 DSL, 14,667 cable and 31,926 mobile broadband subscriptions. Fixed wireless and fibre/satellite subscriptions fell by 4,675 and 832 respectively. Figure 3.1.1 shows the total number of narrowband and broadband internet subscriptions in Ireland as of Q3 2010.

Figure 3.1.1 – Total Number of Active Internet Subscriptions

Subscription Type	Q3'10 Subs	Quarterly Growth Q2'10 – Q3'10	Year-on-Year Growth Q3'09 – Q3'10
Total Narrowband	61,564	-20.3%	-60.6%
DSL Broadband¹²	732,331	+0.3%	+5.1%
Mobile Broadband	540,546	+6.3%	+35.0%
Cable Broadband	187,813	+8.5%	+36.5%
Other Broadband¹³	87,935	-8.4%	+5.3%
Total Internet Subscriptions	1,610,189	+1.8%	+7.8%

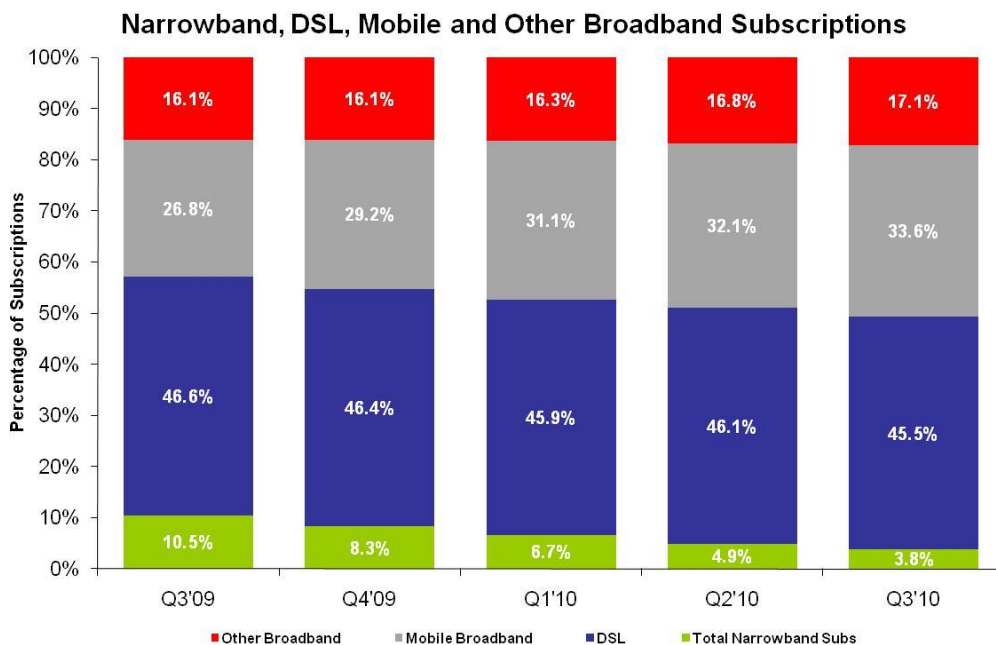
12 DSL refers to a digital subscriber line, the means by which broadband speeds (i.e. in excess of 144k downstream) are delivered over the copper telecoms network.

13 Other Broadband includes fixed wireless access, fibre, satellite broadband connections.

Figure 3.1.2 profiles internet subscriptions in Ireland using the classifications of subscription type outlined in Figure 3.1.1. The market share of narrowband subscriptions has fallen by 6.6 percentage points between Q3 2009 and Q3 2010.

Broadband subscriptions accounted for 96.2% of all internet subscriptions as of Q3 2010 compared to 89.5% in Q3 2009. DSL subscriptions account for the single largest majority of internet subscriptions (45.5%). Mobile broadband subscriptions have grown significantly over the last number of years and now account for 33.6% of all internet subscriptions.

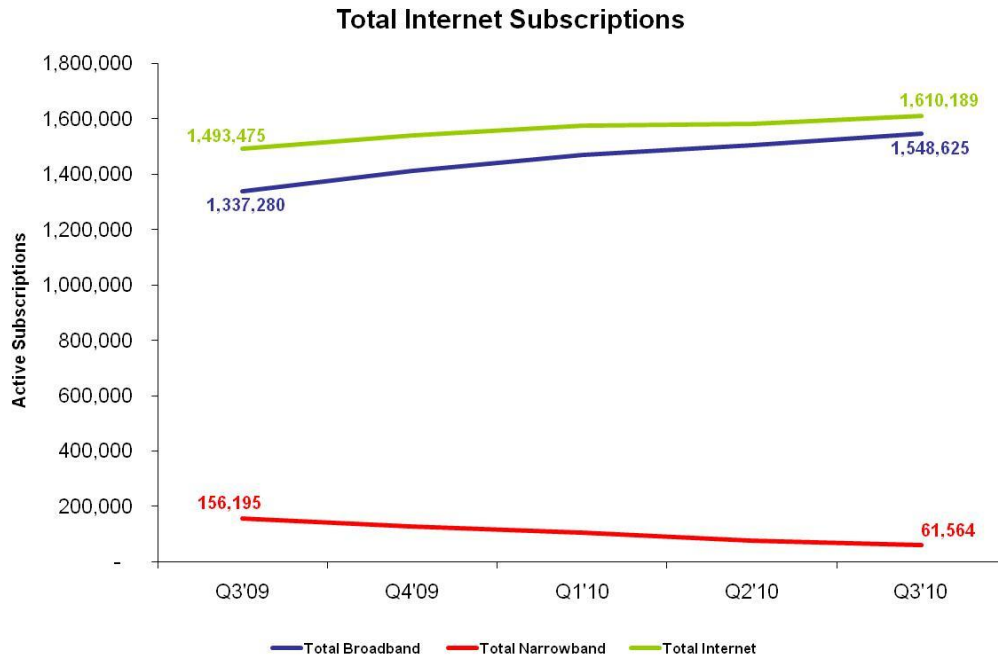
Figure 3.1.2 – Profile of Active Internet Subscriptions



Source: Quarterly Key Data Questionnaire

Figure 3.1.3 shows the change in total internet subscriptions, narrowband subscriptions and broadband subscriptions since Q3 2009. Broadband subscriptions exceeded narrowband subscriptions for the first time in Q1'07. Since that point, narrowband subscriptions have continued to decline quarter on quarter.

Figure 3.1.3 – Total Internet Subscriptions

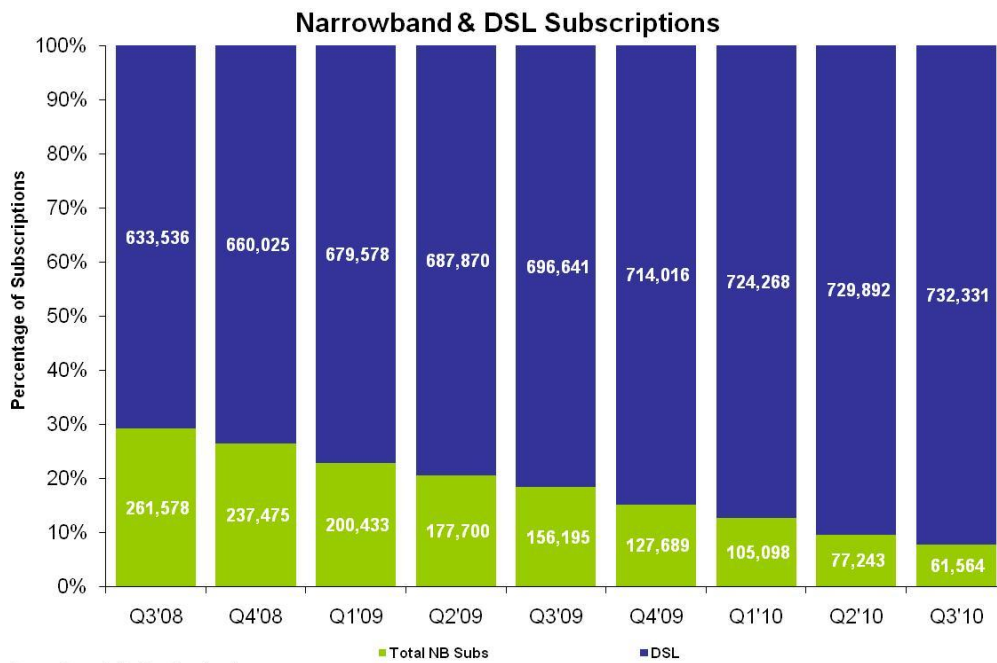


Source: Quarterly Key Data Questionnaire

Figure 3.1.4 profiles only those internet subscriptions delivered over the copper telecoms network. It shows narrowband and DSL subscriptions. There were 793,895 active internet subscriptions over the copper telecoms network at the end of September 2010. This was a decrease of 13,240 (-1.6%) in the total number of copper-based subscriptions since Q2 2010. Since September 2009 internet subscriptions over the copper telecoms network have fallen by 6.9%, due to the decline in narrowband subscriptions.

DSL accounted for 92.2% of copper-based internet subscriptions in Q3 2010 compared to 81.7% in Q3 2009 with the remainder accounted for by narrowband subscriptions.

Figure 3.1.4 – Profile of Copper Based Internet Subscriptions



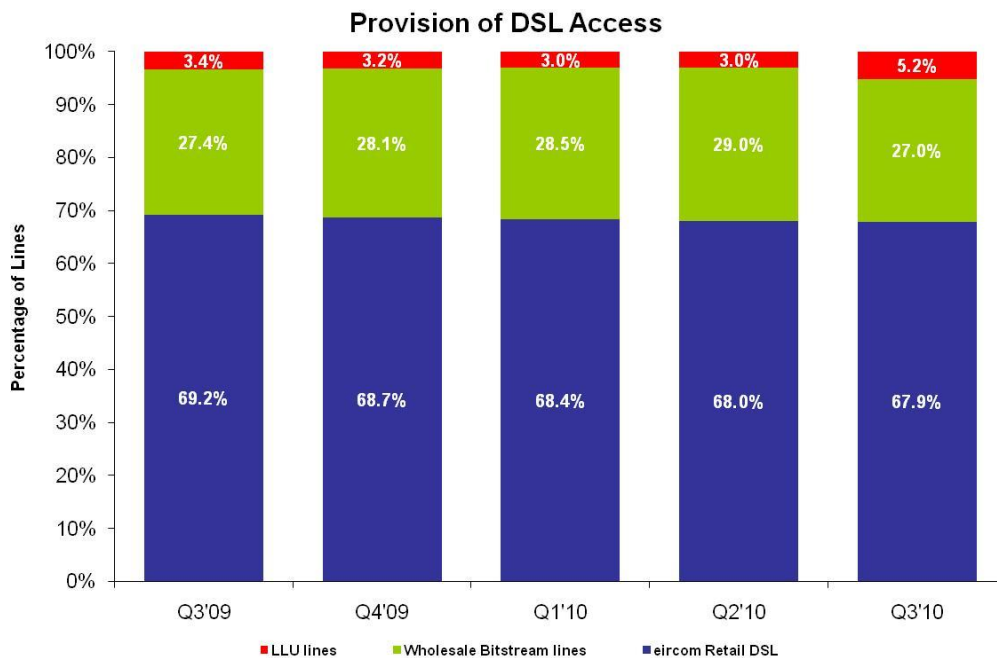
Source: Quarterly Key Data Questionnaire

3.2 Provision of DSL Access

Figure 3.2.1 examines the provision of DSL access. DSL broadband services are provided to consumers by operators using three alternative methods of access. DSL may be provided directly to the consumer by Eircom using direct access to its network; this accounted for 67.9% of all DSL subscriptions in Q3 2010. Retail DSL may also be provided by alternative operators (OAOs) who use either wholesale bitstream, which enables OAOs to resell another operator’s DSL service, or by offering DSL-based broadband using local-loop unbundling (LLU).

In Q3 2010, 27% of all DSL lines were provided by OAOs using wholesale bitstream. In absolute terms there were 197,380 wholesale bitstream lines in Q3 2010, a decrease of 6.7% on the previous quarter but an increase of 3.4% since Q3 2009. This is the first quarter in which bitstream lines have declined as OAOs increase migration of customers to LLU. The remaining 5.2% of DSL lines were provided to subscribers by OAOs using local-loop unbundling. In Q3 2010 there were 37,778 local loops unbundled. There was a relatively large increase in total LLU lines this quarter (up 15,736), which was driven by an increase in shared lines (up 16,349), as full LLU lines declined by 613 in Q3 2010. Eircom’s market share of retail DSL lines has declined by 1.3 percentage points over the last year.

Figure 3.2.1 - Provision of DSL Access



Source: Quarterly Key Data Questionnaire

Figure 3.2.2 below shows LLU lines by type (shared or full) as of 1 July 2010. As of 1 July 2010, approximately 70% of Ireland’s total LLU lines were full compared to an EU average of 84%. Germany had the highest number of LLU lines among the 25 countries benchmarked below, while Bulgaria had the lowest number of LLU lines. This data refers to the period 1 July 2010. Q3 2010 LLU data can be found on the following page (page 32), which shows that due to a significant increase in shared LLU lines, full LLU lines now represent 39.3% of total LLU lines.

Figure 3.2.2 - LLU Lines by Type of Access, July 2010

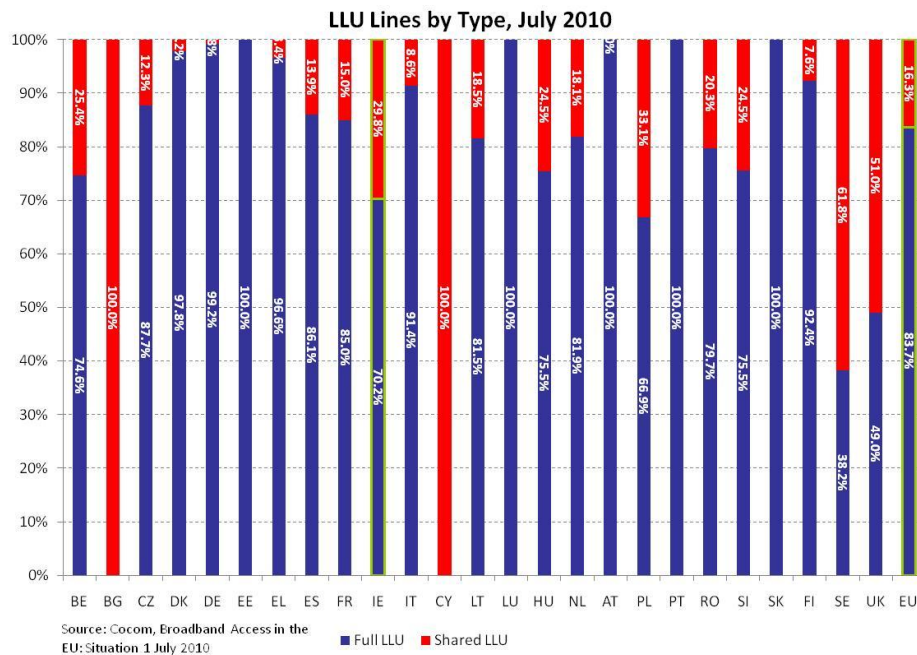
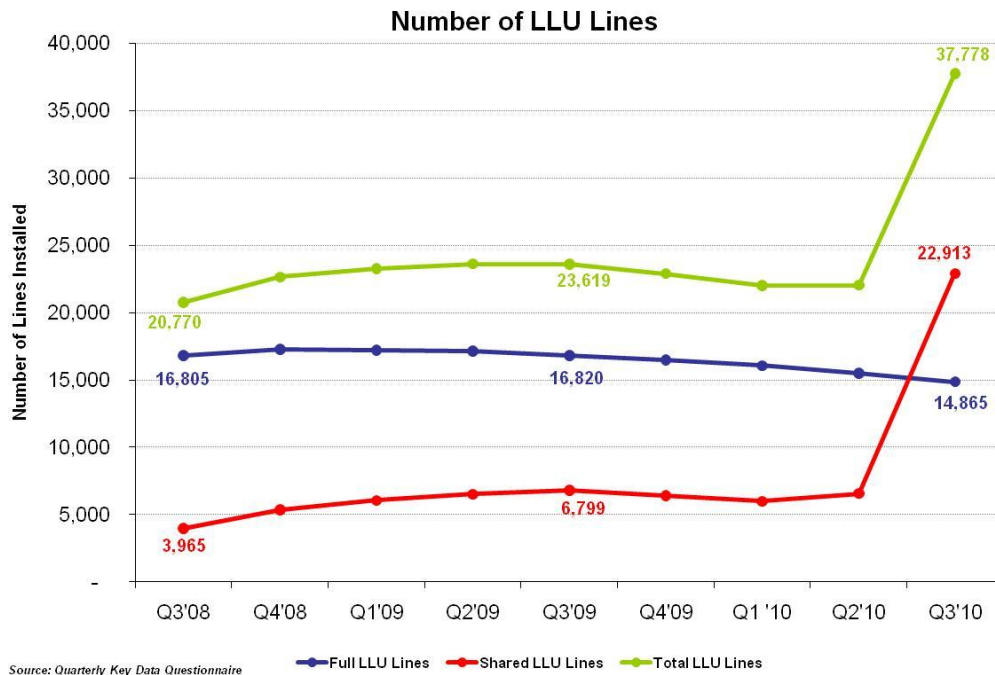


Figure 3.2.3 shows the number of unbundled lines classified by shared and full¹⁴ status. Between Q3 2008 and Q3 2010 the total number of LLU lines increased by 81.9%. There was a substantial increase in total LLU lines this quarter (71.4%) driven by an increase in shared lines (249.1%). However, full LLU lines declined by 4.0% this quarter.

ComReg notes that some alternative operators are actively migrating customers to LLU from Bitstream lines. ComReg hopes that the number of LLU lines will continue to increase following its decision¹⁵ to reduce wholesale line share charges from €8.41 to €0.77 and the unbundled local loop and sub-loop unbundled price from €16.43 and €14.83 per month to €12.41 and €10.53 respectively.¹⁶

Fully unbundled lines accounted for 39.3% of total LLU lines in Q3 2010 with the remaining 60.7% accounted for by shared LLU lines.

Figure 3.2.3 – Number of Local Loops Unbundled



14 Full LLU and shared LLU are two ways a copper loop may be unbundled. While full LLU assigns the entire copper loop to the leasing operator, shared LLU enables other operators and the incumbent to share the same line. With shared access consumers can acquire voice and data services from an operator or alternatively data services alone while retaining the voice services of the incumbent.

15 Decision D4/09 available at http://www.comreg.ie/_fileupload/publications/ComReg0966.pdf

16 Response to Consultations and Final Decision: Local Loop Unbundling (LLU) and Sub-Loop Unbundling (SLU) Maximum Monthly Rental Charges available at http://www.comreg.ie/_fileupload/publications/ComReg1010.pdf

3.3 Provision of Broadband Services

At the end of September 2010, there were 1,548,625 broadband subscriptions in Ireland. This represents a growth rate of 2.9% this quarter and 15.8% growth since Q3 2009. Cable showed the strongest growth this quarter and over the last year, up by 8.5% since Q2 2010 and up by 36.5% since Q3 2009. FWA subscriptions continued to decline since peaking in Q1'08, falling by 5.6% this quarter (and down 16.2% year-on-year). The other subscriptions category (satellite and fibre) decreased this quarter by 8.4% though these subscriptions are up on one year previously (by 5.3%). Mobile broadband grew by 6.3% in Q3 2010 and grew by 35.0% year on year to Q3 2010.

Figure 3.3.1 – Broadband Subscriptions¹⁷ and Growth Rates by Platform

Platform	Q3'10 Subs	Quarterly Growth Q2'10-Q3'10	Year-on-Year Growth Q3'09-Q3'10
DSL	732,331	+0.3%	+5.1%
Cable	187,813	+8.5%	+36.5%
FWA	78,835	-5.6%	-16.2%
Other¹⁸	9,100	-8.4%	+5.3%
Sub-Total	1,008,079	+1.2%	+7.6%
Mobile Broadband	540,546	+6.3%	+35.0%
Total	1,548,625	+2.9%	+15.8%

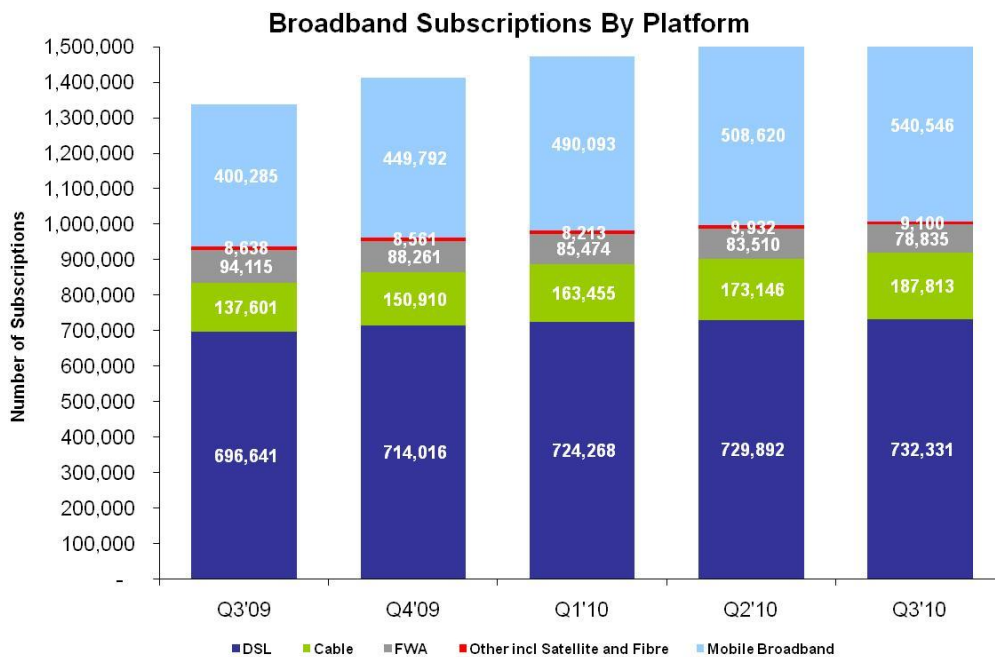
17 ComReg notes that the data provided in this section relates to active subscriptions reported by operators. It takes into account multiple active subscriptions to broadband offerings by individual subscribers.

18 Other Broadband includes Satellite and Optical Fibre broadband subscriptions.

DSL remains the largest broadband access platform in terms of subscriptions. DSL accounts for 47.3% of all broadband subscriptions, a 1.2 percentage decrease from Q2 2010. Of the remaining broadband subscriptions, mobile broadband accounts for 34.9%, cable has 12.1% of the market and FWA accounts for 5.1% of broadband subscriptions. Satellite and fibre broadband subscriptions account for the remaining 0.6% of the market.

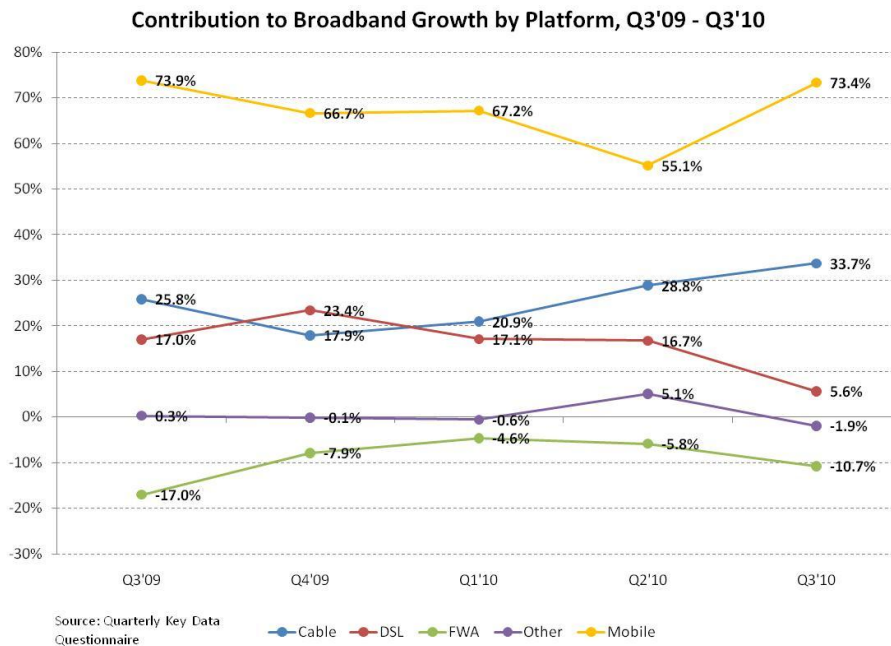
Figure 3.3.2 illustrates the split by type of broadband subscriptions in the Irish market since Q3 2009, while Figure 3.3.3 shows the contribution of each of these platforms to broadband growth in percentage terms. In Q3 2010 73.4% of total broadband net adds were mobile while FWA contributed the least to total broadband net adds with a contribution of minus 10.7%.

Figure 3.3.2 – Broadband Subscriptions by Platform



Source: Quarterly Key Data Questionnaire

Figure 3.3.3 – Broadband Subscriptions by Platform – Contribution to Growth



At an EU wide level (Figure 3.3.4) Ireland (71%) has a lower proportion of DSL lines than the EU average (78%), and Ireland (17%) has an almost similar proportion to EU average cable broadband subscriptions (16%). The proportion of other fixed broadband lines in Ireland is approximately double (12%) that of the EU average (6%).

Figure 3.3.4 – Fixed EU Broadband Subscriptions by Platform

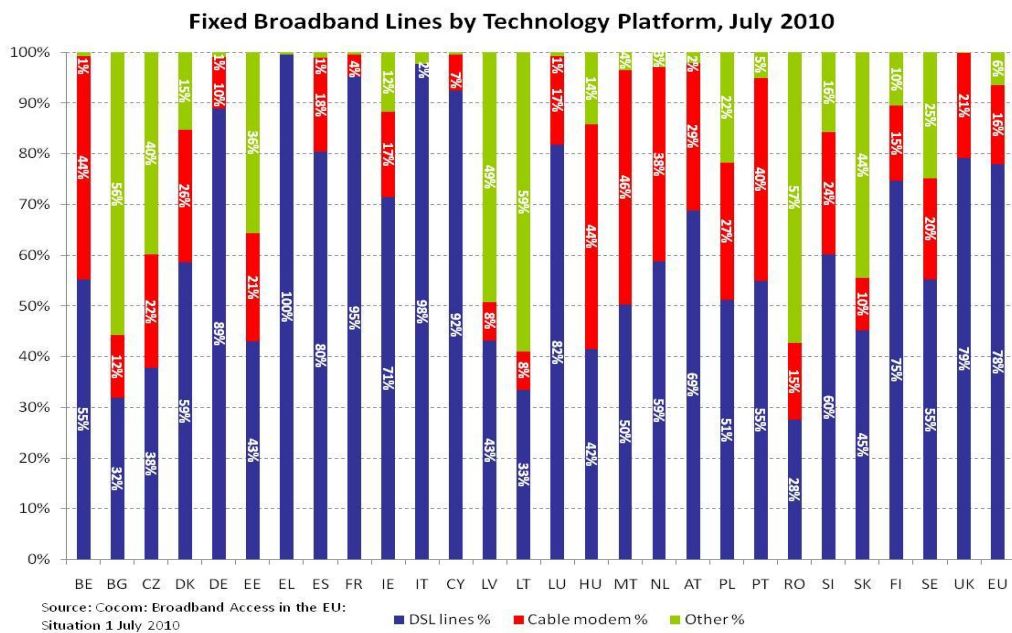


Figure 3.3.5 provides an estimate of the proportion of business and residential subscriptions to DSL, cable, fixed wireless, mobile broadband, fibre and satellite broadband services. In Q3 2010 82.4% of broadband subscriptions on all platforms were classed as residential broadband subscriptions.

The platform with the highest percentage of residential subscriptions is cable broadband, while satellite and fibre subscriptions (classified as "Other") have the highest percentage split of business customers.

Figure 3.3.5 – Broadband Subscriptions by Subscription Type

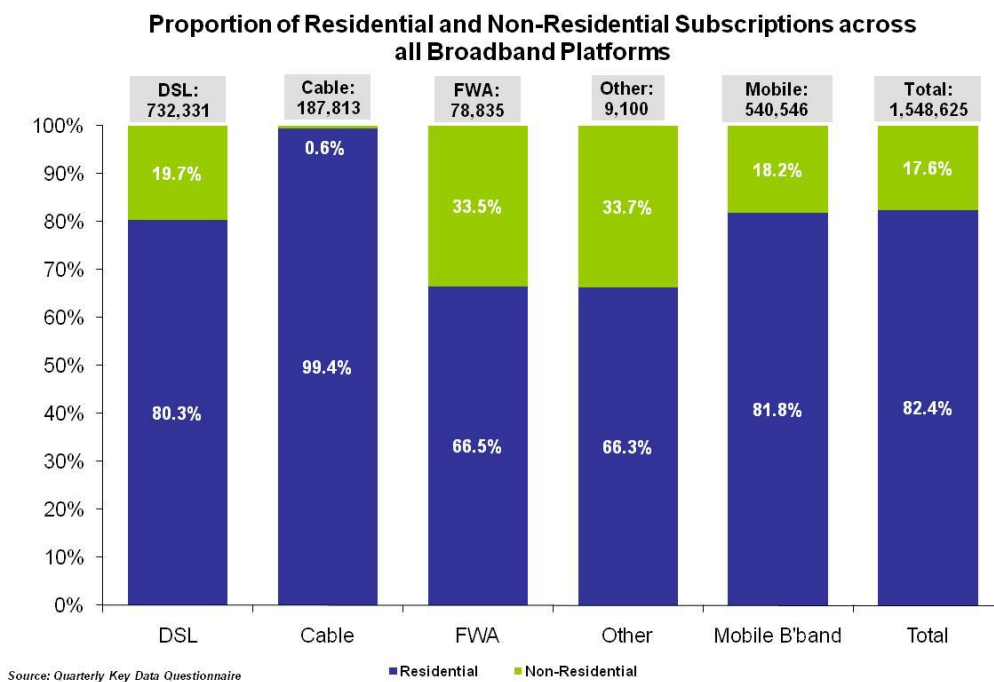


Figure 3.3.6 illustrates the breakdown of broadband subscriptions by contracted speed across all broadband platforms (including mobile broadband). The trend of customers moving to higher speeds has continued in Q3 2010, with speeds of $\geq 2\text{Mbps}$ increasing at the expense of the other lower category speeds.

The data suggest that both residential and business users are more likely to subscribe to packages of between 2Mbps - 10Mbps. Many larger firms access their broadband services over leased lines. Leased lines are not included in these charts. Leased line speeds can range up to speeds in excess of 1 gigabyte per second.

Figure 3.3.6 – Broadband Subscriptions by Contracted Download Speeds and Subscription Type

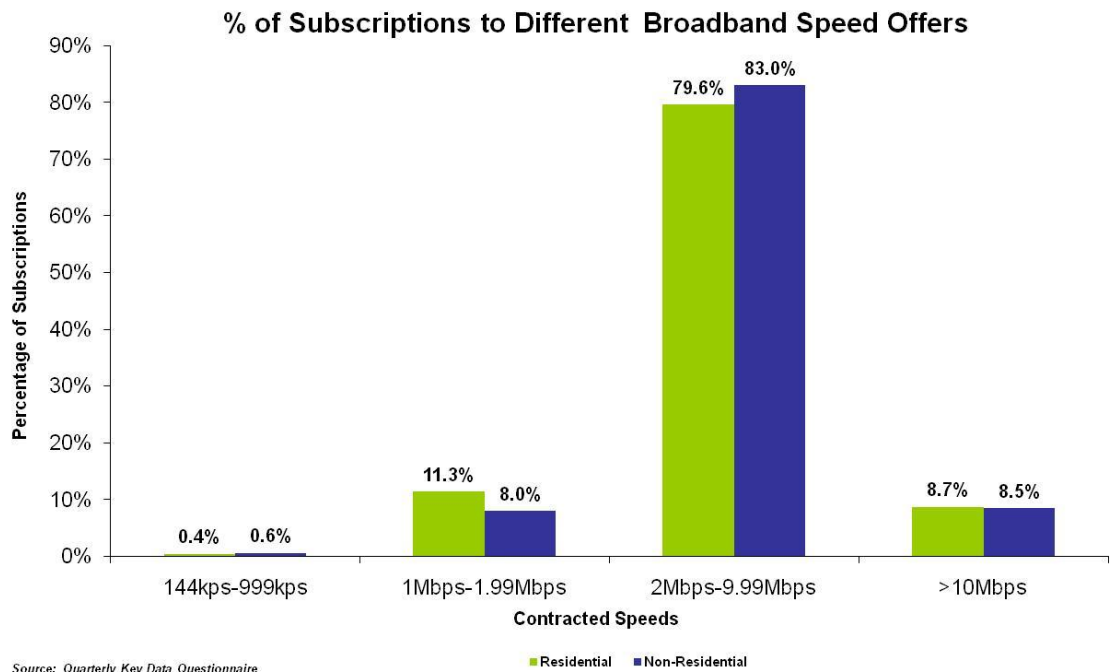


Figure 3.3.7 shows the change in broadband subscriptions by contracted downloaded speeds between Q3'09 and Q3'10. Subscriptions in the lower speed categories, 144kps-999Mbps and 1Mbps-1.99Mbps, have continued to decline. Subscriptions in higher speed categories, 2Mbps-9.99Mbps and >10Mbps have increased. 80.2% of all broadband subscriptions are now in the 2Mbps-9.99Mbps category, while 8.7% are in the >10Mbps category.

Figure 3.3.7 – Broadband Subscriptions by Contracted Download Speeds

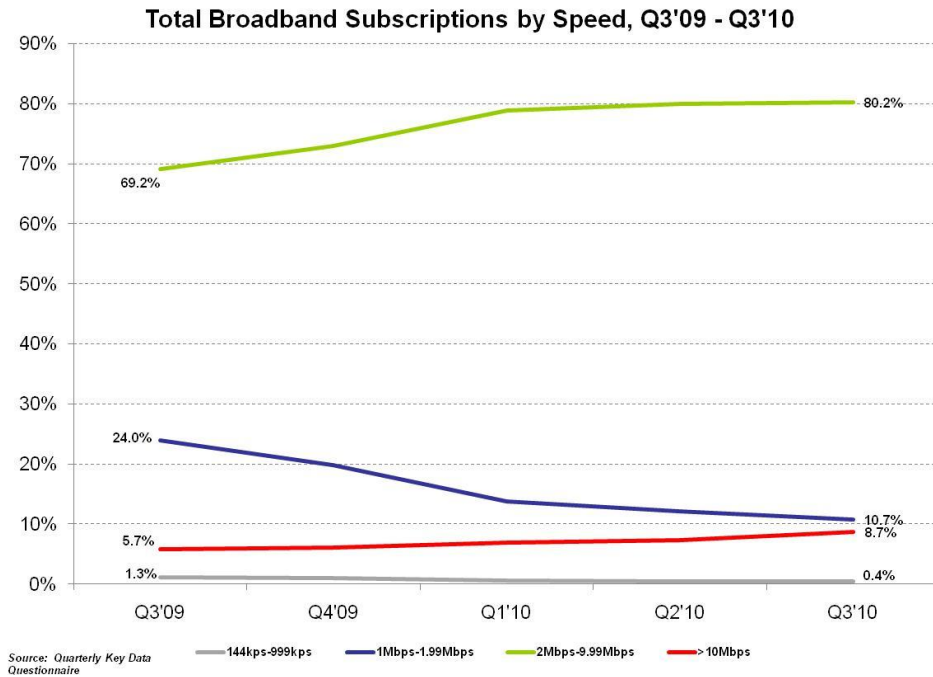


Figure 3.3.8 below shows fixed broadband speeds across EU countries. Ireland has the 6th highest proportion of subscriptions under 2Mbps (23%), the 5th highest proportion of subscriptions between 2 and 10Mbps (66%) and ranks 19th (at 11%) in terms of subscriptions over 10Mbps.

Figure 3.3.8 – EU Fixed Broadband Subscriptions by Speeds, July 2010

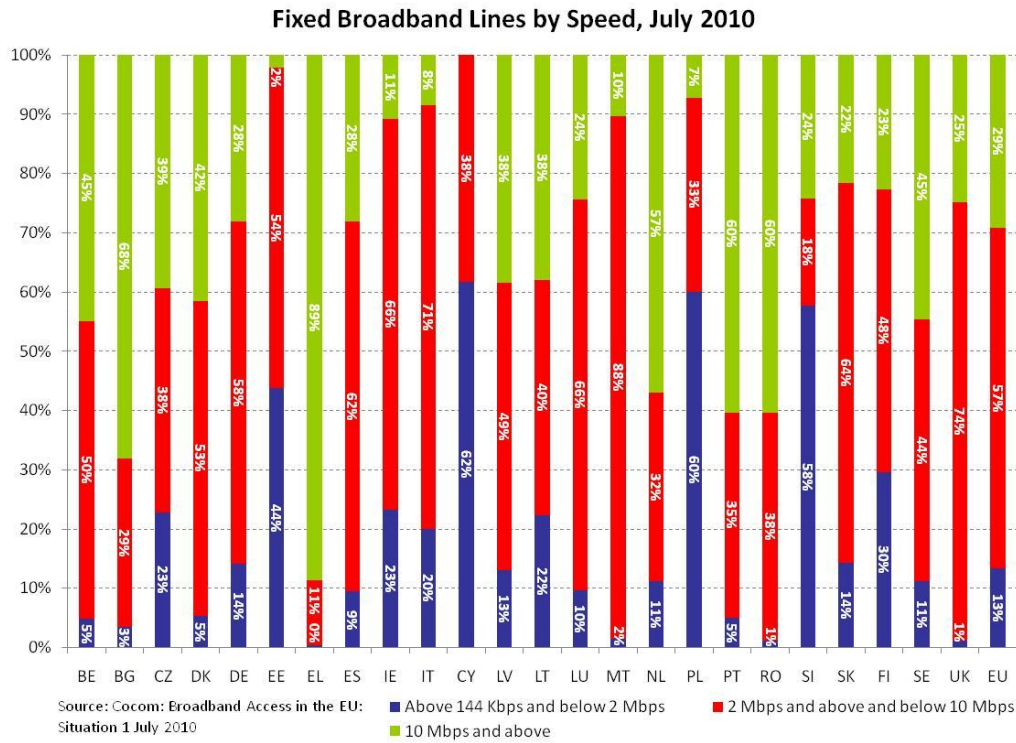


Figure 3.3.9 illustrates Eircom’s market share of fixed broadband subscriptions when compared to other authorised operators’ (OAO) share of overall fixed broadband subscriptions (DSL, cable, FWA, satellite, and fibre broadband subscriptions).

In Q3 2010 Eircom’s market share was 49.3% with OAOs having the remaining 50.7% of broadband subscriptions.

Figure 3.3.9 – Market Share of Fixed Broadband Market

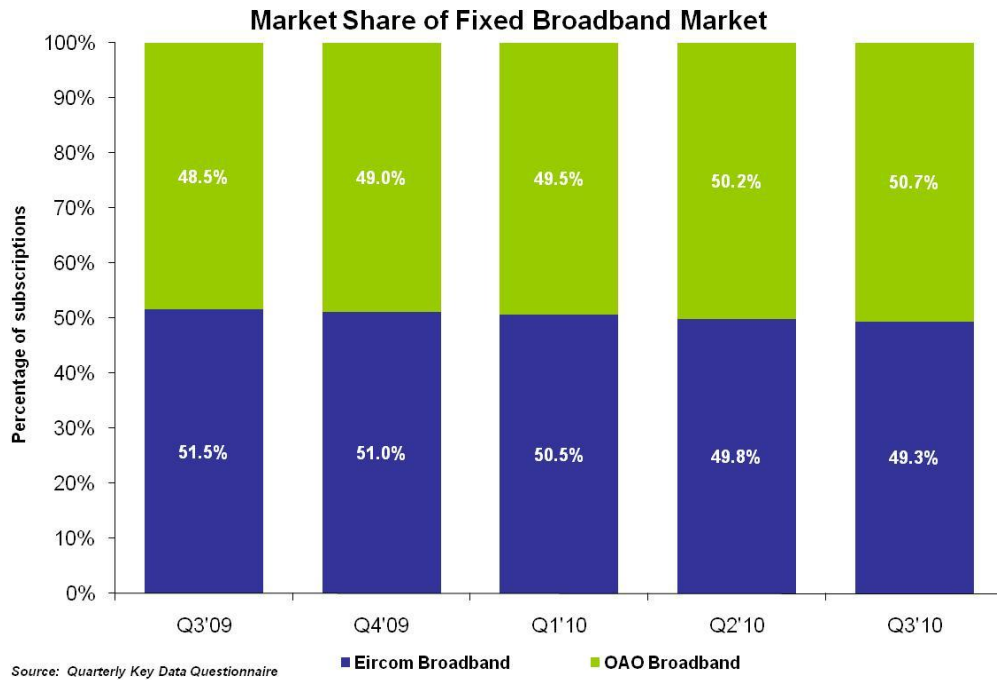


Figure 3.3.10 shows Eircom’s market share of fixed broadband subscriptions compared to OAOs as of July 2010. At 49%, Ireland’s incumbent (Eircom) has the 12th highest fixed broadband market share among the benchmarked countries, 5 percentage points more than the EU average of 44%.

Figure 3.3.10 – Market Share of Fixed Broadband Market

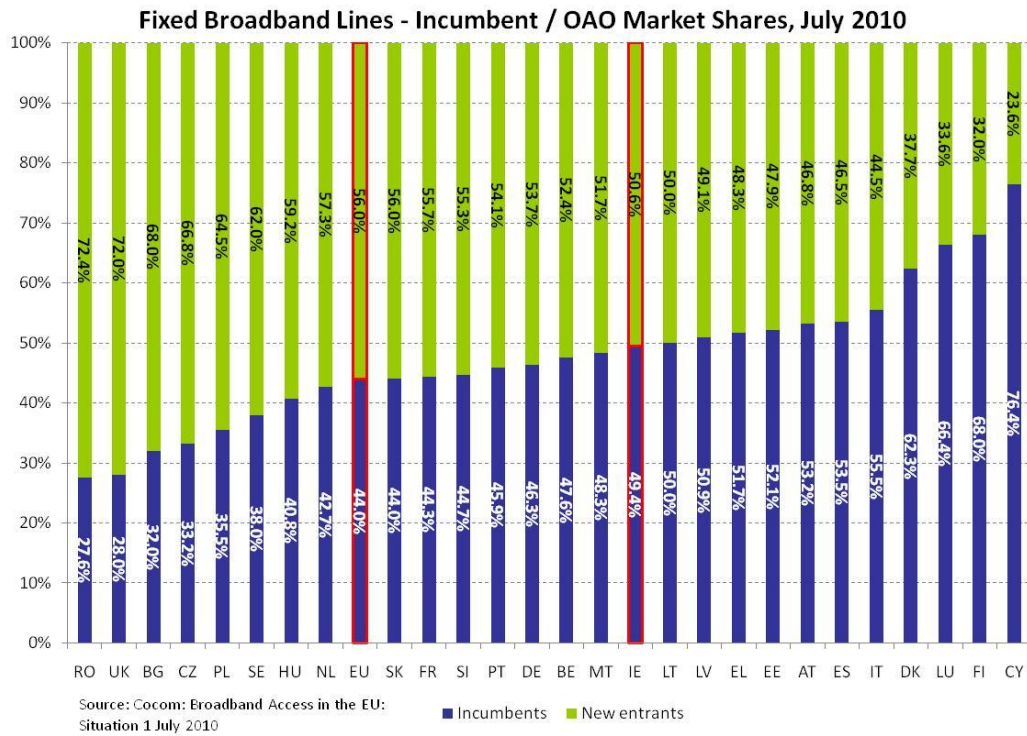


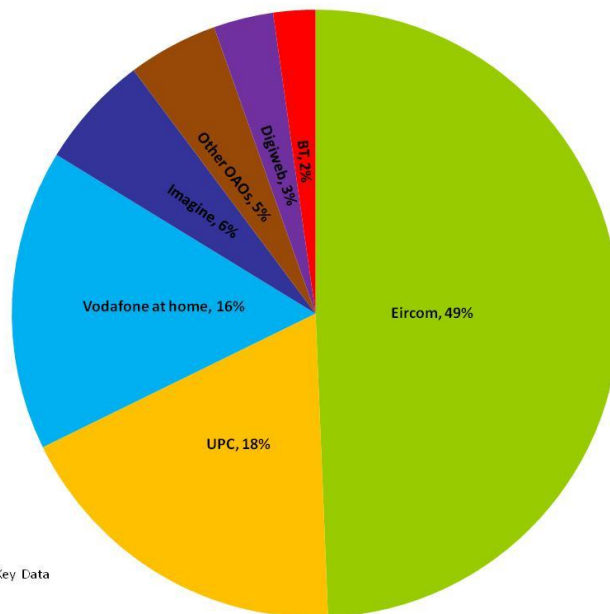
Figure 3.3.11 provides the market share of fixed broadband operators by number of subscriptions. DSL, cable modem, FWA, satellite and fibre subscriptions are all included in the total broadband subscriptions figure which is used to calculate market shares.

Operators with a market share of 2% or more are shown in the chart below. All those operators with less than 2% of total fixed broadband subscriptions are then grouped together under OAOs.

According to the data received from operators for Q3 2010, Eircom had 49% of total fixed broadband subscriptions, followed by UPC who had 18% of subscriptions. Vodafone had a 16% market share (excluding mobile broadband subscriptions), while Imagine had 6% of the market, Digiweb had 3% and BT had 2%. All other operators combined accounted for the remaining 5% of the fixed broadband subscriptions.

Figure 3.3.11 – Subscription Market Share of Fixed Broadband Market

Fixed Broadband Market Share (Subscriptions), Q3 2010

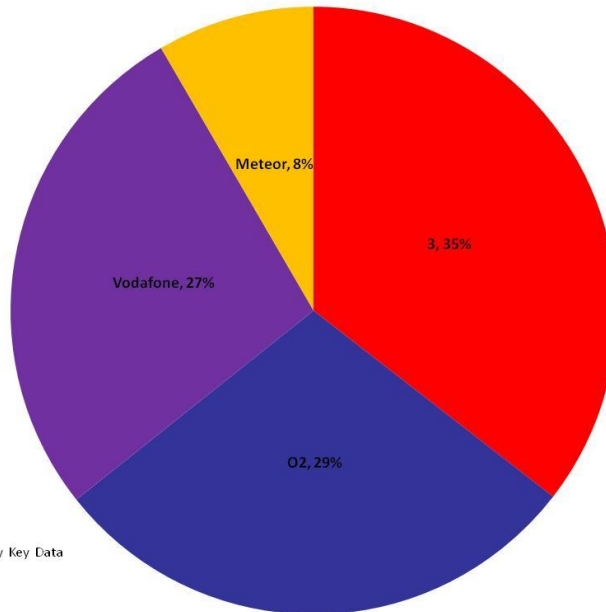


Source: Quarterly Key Data Questionnaire

Figure 3.3.12 shows the market share of mobile broadband operators by number of subscriptions. 3 has the largest share (35%)¹⁹, followed by O2 (29%), Vodafone (27%) and Meteor (8%).

Figure 3.3.12 – Subscription Market Share of Mobile Broadband Market

Mobile Broadband Market Share (Subscriptions), Q3 2010



Source: Quarterly Key Data Questionnaire

¹⁹ 3's subscription base includes their national broadband scheme subscriptions.

3.4 Broadband Penetration

In presenting broadband penetration benchmarks for European countries, ComReg uses the OECD, the European Competitive Telecoms Association (ECTA) or European Commission data where possible. ComReg will endeavour to publish this data on a quarterly basis as detailed in Figure 3.4.1. The data presented is based on the most recently published statistics at the time of publication.

Figure 3.4.1 – Broadband Data Sources

Source	Publish Date	Data Period as of	Included in ComReg Quarterly Report
OECD	December 2010	June 2010	Q4'10
Cocom	March 2011	January 2010	Q1'11

As per Figure 3.3.1 the total number of broadband subscriptions in Ireland for Q3 2010 was 1,548,625. Based on this data, the broadband per capita penetration rate (including mobile broadband) in Q3 2010 was 34.7% compared to 33.8% in the previous quarter. When mobile broadband is excluded, the penetration rate is 22.6%, up from 22.3% in Q2 2010. These figures are based on a population of 4,459,300 from Central Statistics Office (CSO) data.²⁰

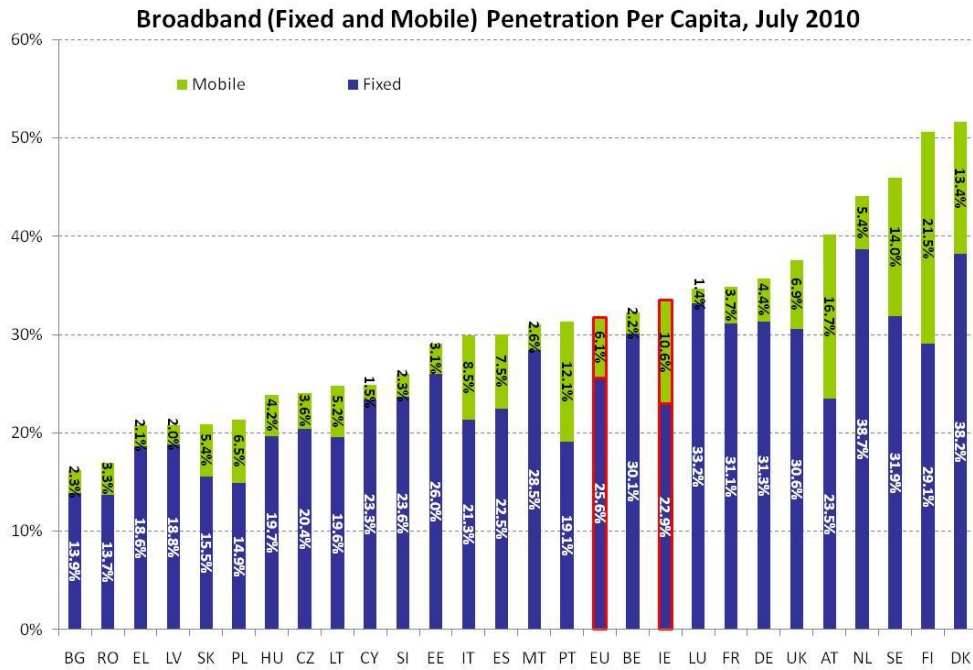
It should be noted that a broadband subscriber may have both a fixed and mobile broadband subscription and therefore, a broadband penetration rate based on both mobile and fixed subscriptions may overestimate the penetration rate through double counting of subscriptions.

Using fixed residential broadband subscriptions only (i.e. excluding business subscriptions and mobile broadband subscriptions), the broadband household penetration rate (there are 1,599,500 households in Ireland using CSO data) as of Q3 2010 is 52%.

²⁰ <http://www.cso.ie/releasespublications/documents/population/current/popmig.pdf>

While Ireland (22.9%) is behind the EU average (25.6%) fixed broadband penetration rate as of July 2010, if mobile broadband (over dedicated devices) is included, then Ireland’s penetration rate (33.5%) is two places ahead of the EU average (31.7%).

Figure 3.4.2 – EU Broadband Penetration Per Capita, July 2010



Source: CoCom: Broadband Access in the EU: Situation at 1 July 2010

3.5 WiFi Broadband Access

ComReg provides data on the provision of public and private broadband services over WiFi, as such access provides an alternative means of internet access for those users without internet access at home and/or a supplementary means of access for users who are away from their home or office. In addition new and more advanced devices such as the iPhone, as well as increased usage of mobile broadband dongles while consumers are on the move, appear to be driving increased minutes of use in WiFi hotspots.

ComReg presents data on the WiFi market based on the number of WiFi hotspots and access points located nationally. Internet hotspots are typically public wireless access points where a computer, usually a laptop, or other portable device such as an iPhone can connect to the internet. A WiFi hotspot can be made up of one or more WiFi access points²¹.

WiFi hotspots tend to be found in airports, hotel lobbies and cafés and restaurants. In most cases, the user pays for high-speed internet access at an access point, based either on a vouchered payment for a specific amount of time online or a recurring monthly subscription. There are a number of providers of these services in Ireland including Bitbuzz, Eircom and BT Ireland.

The number of WiFi hotspots has decreased by almost 2% this quarter and has fallen by 10% since Q3 2009. In Q3 2010 there were just over 36 million WiFi minutes of use in Ireland, an increase of almost 20% from the previous quarter. The number of access points decreased this quarter by 0.5% but has increased by 7.6% between Q3 2009 and Q3 2010. This may suggest that, on the whole, declines in the number of businesses as a result of the recession (such as cafes and hotels) has led to a fall in hotspots while access points are increasing within hotspots.

Figure 3.5.1 – WiFi Hotspots, Access Points and Minutes of Use

	Q3 2010	Q2'10-Q3'10 Growth	Q3'09-Q3'10 Growth
WiFi Hotspots	1,095	-1.8%	-10.0%
WiFi Access Points	3,587	-0.5%	+7.6%
WiFi Minutes of Use	36,907,371	+19.7%	+75.3%

21 Hotspots are typically public locations at which broadband internet access can be obtained. At these hotspots, users with a computer (usually a laptop) can wirelessly connect to the internet either for free or on payment of a fee. Typical locations for such hotspots include cafes and restaurants, hotels and airports. In general terms, more than one access point can be found at a hotspot.

3.6 ADSL Pricing Data²²

In this report broadband tariff baskets have been supplied by Teligen using their T-Connect product. In order to ensure that services can be adequately compared, the benchmarking model prices a range of DSL and cable services based on defined usage of 30 hours per month, with each session assumed to last for 30 minutes for residential consumers and 100 hours per month; a 60 minute average session for business consumers is assumed.

While broadband is an always-on product, the assumption of an average user profile ensures that packages are comparable across countries. It further assumes a download usage of 5 Gigabytes every month for each service for residential consumers and 20 Gigabytes every month for business consumers. Upload and download speeds (based on contracted speeds) are also analysed.

The data presented in the following charts illustrates the cheapest product available in each country from the two biggest fixed line DSL operators (by market share i.e. Eircom and Vodafone at Home)²³ under these usage assumptions and the incumbent for cable offerings (i.e. UPC for Ireland).

These packages are based on advertised download speeds. The charts below represent speed categories of 1-4 Mbps in the residential market, all residential speeds and 4-10 Mbps in the business market. More specific details on the upload and download speeds for each of the analysed products are included in the chart.

The speed categories were chosen for these operators across all benchmarked countries to ensure that a meaningful comparison can be made between packages in terms of contracted speeds offered. Operators' broadband packages are compared on the assumption that their products should be available nationally.

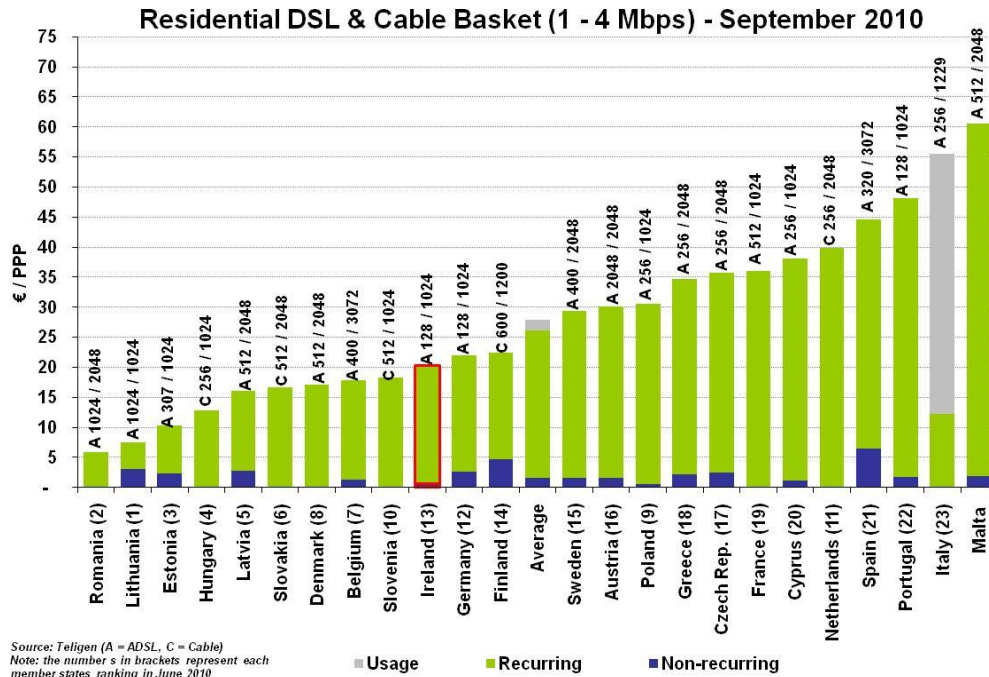
Further information on the composition of the broadband basket can be found in the Explanatory Memorandum which accompanies this report²⁴.

22 This section does not include broadband tariff packages that are offered as special promotions. All residential tariffs are inclusive of VAT but all business tariffs are exclusive of VAT. VAT rates vary between Member States.
23 It should be noted that the majority of BT Ireland's DSL customers were transferred to Vodafone Ireland in September 2009.

24 ComReg Document 10/106a

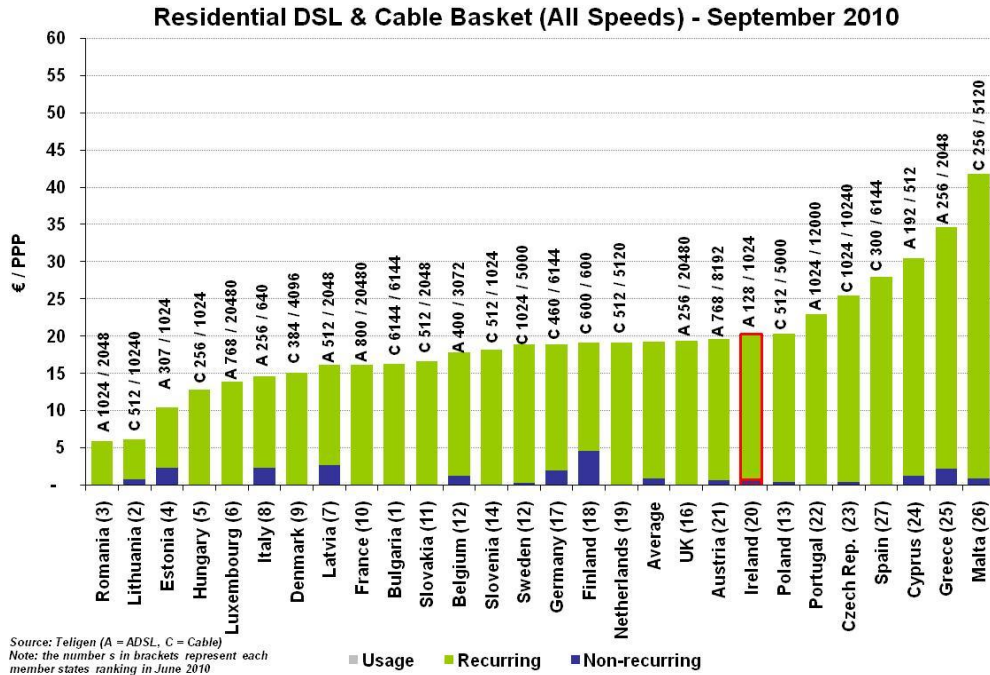
The lowest monthly residential DSL & cable baskets for the 1-4 Mbps speed category are charted in Figure 3.6.1. Ireland ranks in 10th place among this group of 23 European countries. Ireland is three places ahead of, and 27.5% lower than the European average. The pricing for Ireland is based on Eircom’s Broadband Home Starter package.

Figure 3.6.1 - Lowest Monthly Rental Residential DSL & Cable Basket (1-4 Mbps)



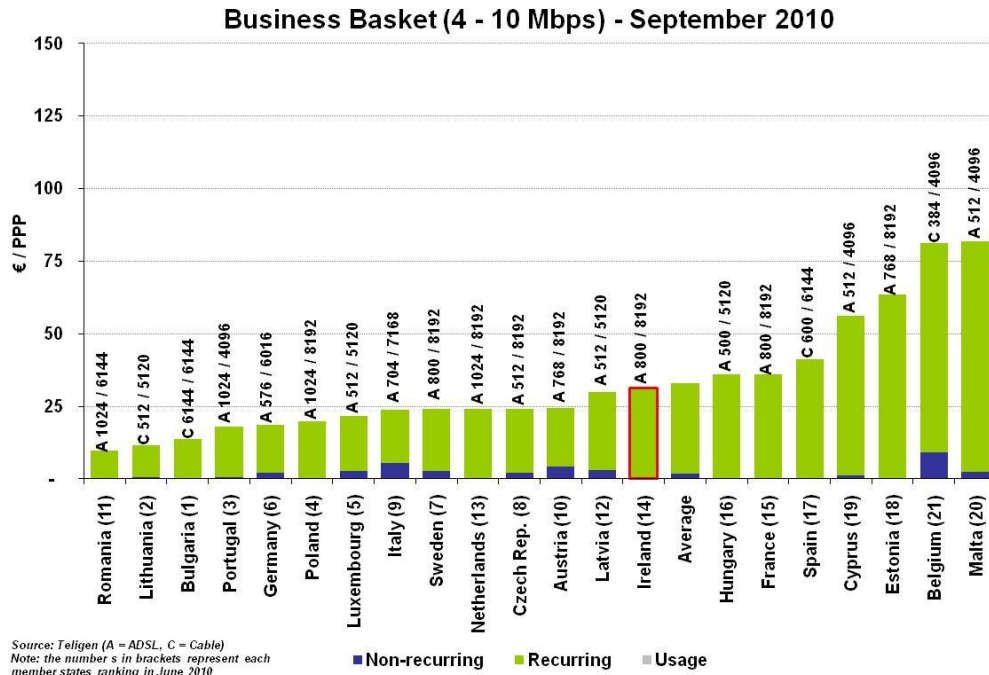
The lowest monthly residential DSL & cable baskets for all speeds are charted in Figure 3.6.2. Ireland ranks in 20th place in this group of 27 European countries. Ireland ranks three places behind, and is 5.3% higher than, the European average. The pricing for Ireland is based on Eircom’s Broadband Home Starter package.

Figure 3.6.2 - Lowest Monthly Rental Residential DSL & Cable Basket (All Speeds)



The lowest monthly business DSL and cable basket for the 4-10 Mbps speed category is charted in Figure 3.6.3. Ireland ranks in 14th place among this group of 21 European countries. Ireland is one place ahead of, and 4.6% lower than the European average. The pricing for Ireland is based on Eircom’s Broadband Business Starter package.

Figure 3.6.3 – Lowest Monthly Business DSL and Cable Basket (4-10Mbps)

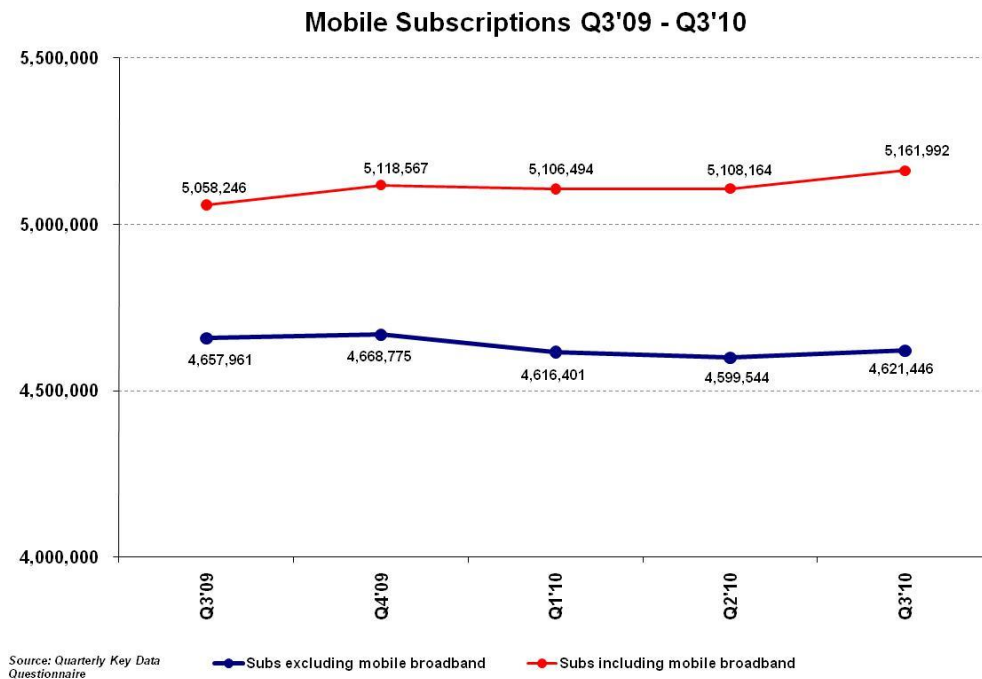


4. Mobile Market Data

4.1 Number of Subscriptions and Penetration Rate

As per Figure 4.1.1 at the end of September 2010 there were 5,161,992 mobile subscriptions in Ireland²⁵. Mobile broadband subscriptions are included in this figure. If mobile broadband subscriptions (540,546 this quarter) are excluded, the total number of mobile subscriptions in Ireland was 4,621,446. If mobile broadband subscriptions are excluded, total subscriptions are down slightly (approx. -1%). This slight decline has been due to a fall in the number of pre-paid subscriptions over the period and may be due to decisions by consumers to cancel mobile phone connections due to the poor economic climate in Ireland over the past 2 years.

Figure 4.1.1 – Mobile Subscriptions



²⁵ Tesco mobile subscription data is not included in subscription data from Q3'09 onwards.

Figure 4.1.2 charts mobile penetration since Q3 2009 and shows that at the end of September 2010, mobile penetration, based on a population of 4,459,300 (using a CSO April 2009 estimate), was 115.7% including mobile broadband and 103.6% excluding mobile broadband. Mobile penetration is recognised as the standard metric internationally to measure the adoption of mobile services, and is calculated based on the number of active SIM cards per 100 of the population.

Given that some mobile users may have used more than one active SIM card during the period, there is likely to be some over-estimation of actual individual mobile penetration using this metric. ComReg’s calculation of mobile subscriptions includes active SIMs bundled with mobile broadband datacards and USB modems for internet access via laptops/PCs as well as SIM cards used in mobile phones for voice and data services.

Figure 4.1.2 – Irish Mobile Penetration Rate

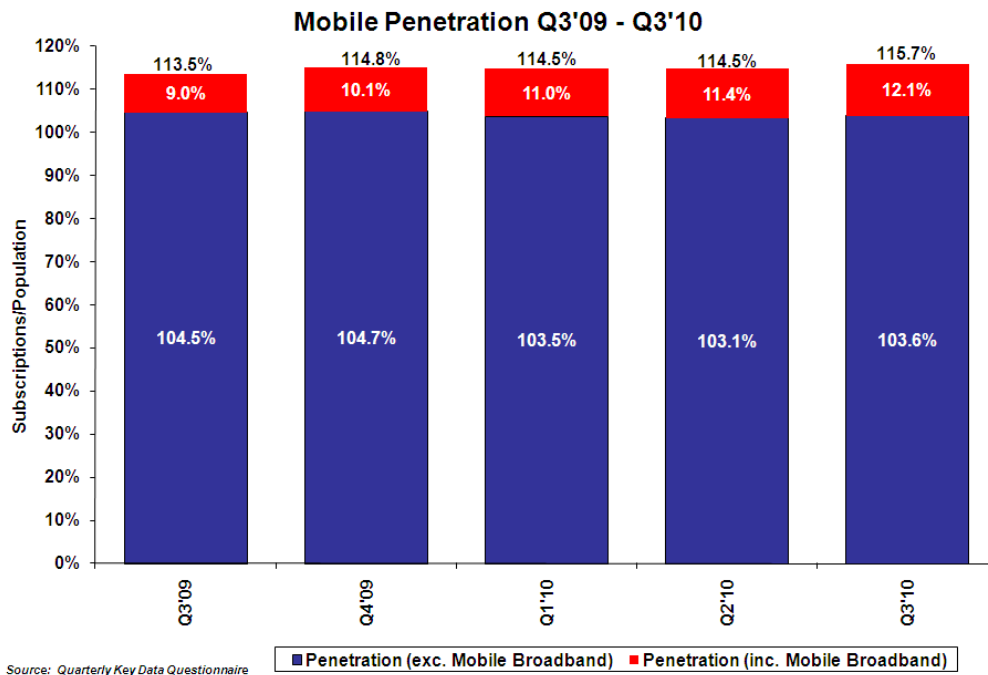
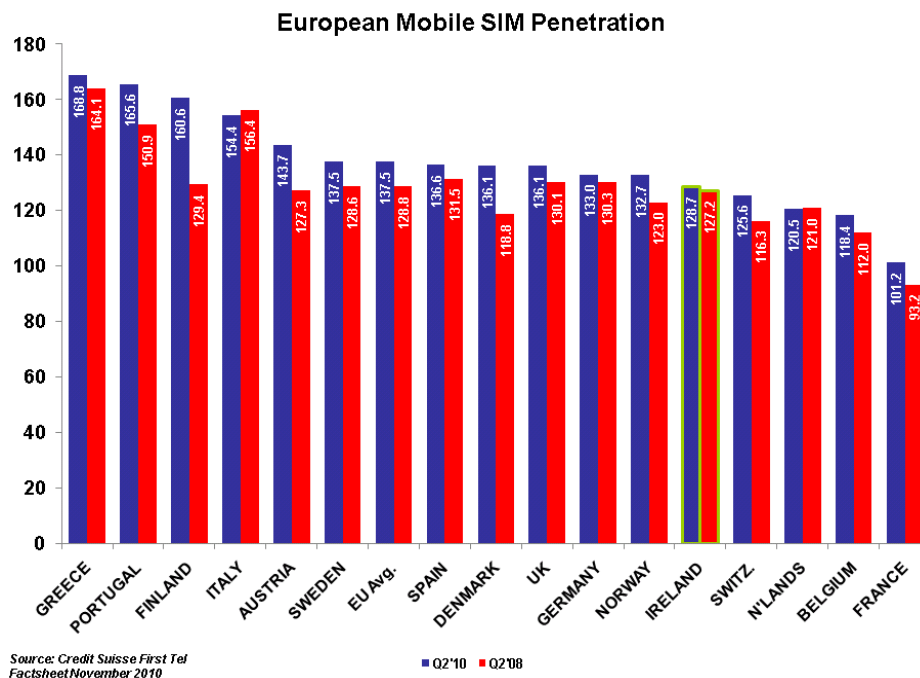


Figure 4.1.3 illustrates estimated national mobile SIM penetration rates across sixteen European countries, including Ireland, between June 2008 and June 2010 based on data from the Credit Suisse First Boston report, First Tel Factsheet. Ireland is behind the European average.²⁶ Greece and Portugal are the two European countries with the highest mobile SIM penetration while France, according to the Credit Suisse data, remains below all other countries benchmarked.²⁷

There has been very little change in the penetration rate among the average of this group of countries, suggesting that market saturation exists at around one and a quarter times the aggregate population of the countries included in Figure 4.1.3.

Figure 4.1.3 – European Mobile SIM Penetration Rates



26 This data is collected by CSFB directly from mobile operator key performance indicators and may refer to registered subscriptions.

27 The penetration rate for Greece may be inflated due to a high level of inactive pre-paid subscriptions reported in the market.

4.2 The Profile of Mobile Subscriptions in Ireland

Mobile users pay for their mobile service by either purchasing pre-paid credit, or by receiving a monthly bill from their mobile operator, described in this report as a post-paid payment option.

Figure 4.2.1 illustrates the mobile subscription base (including mobile broadband) in Ireland classified by the proportion of pre-paid and post-paid subscriptions on both 2G and 3G networks at the end of September 2010. At the end of September 2010, 35.4% of subscriptions were post-paid, which represents a continued increase in post-paid subscriptions at the expense of pre-paid subscriptions over the period.

Figure 4.2.1 – Profile of Pre-Paid and Post-Paid Subscriptions

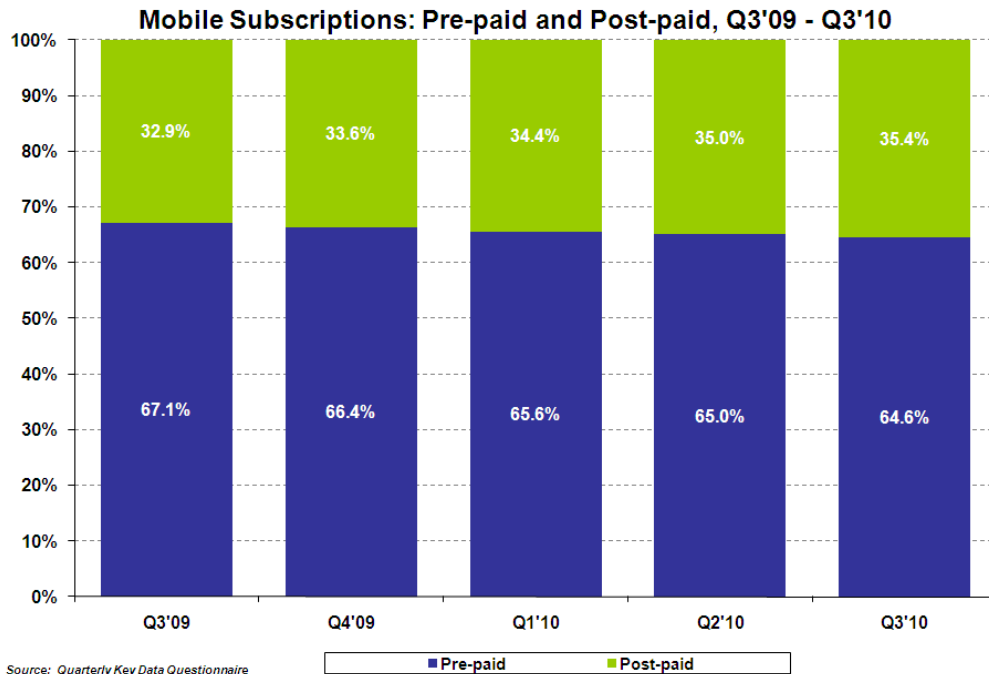


Figure 4.2.2 shows the pre-paid and post-paid subscription profile for each of the mobile operators in the Irish market. Mobile broadband subscriptions are included in this data. As of Q3 2010, 65.5% of Vodafone’s subscriptions are pre-paid. O2 has 57.9% pre-paid subscriptions, Meteor (eMobile’s subscription data is included with Meteor) has 84.4% pre-paid subscriptions, and 31.5% of 3’s mobile subscriptions are pre-paid. Tesco Mobile’s entire subscription base is pre-paid.

Figure 4.2.2 – Profile of Pre-Paid and Post-Paid Subscriptions

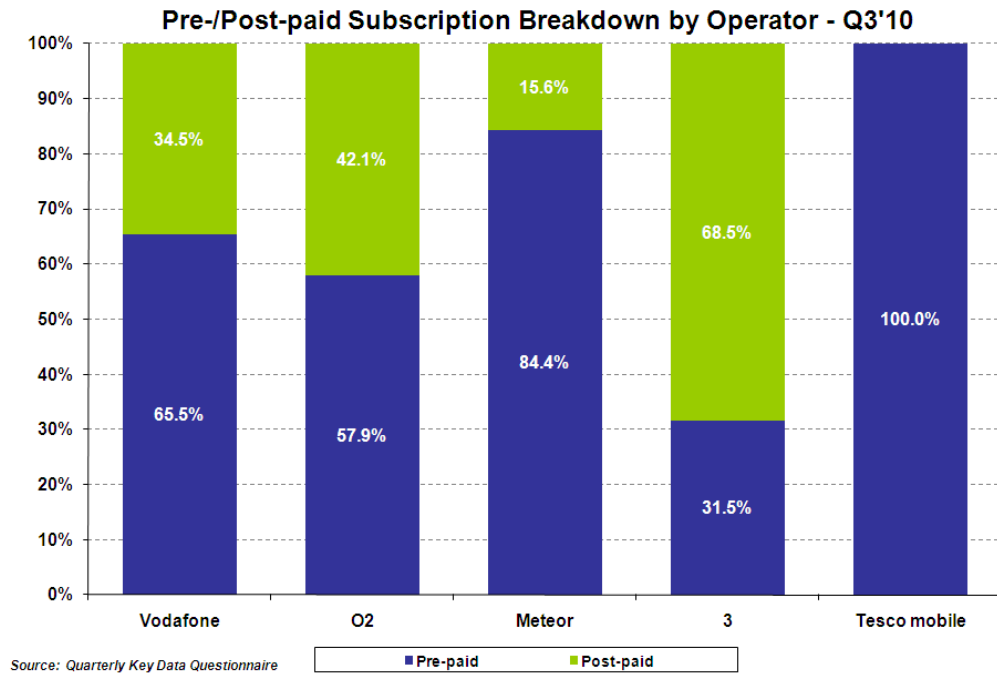
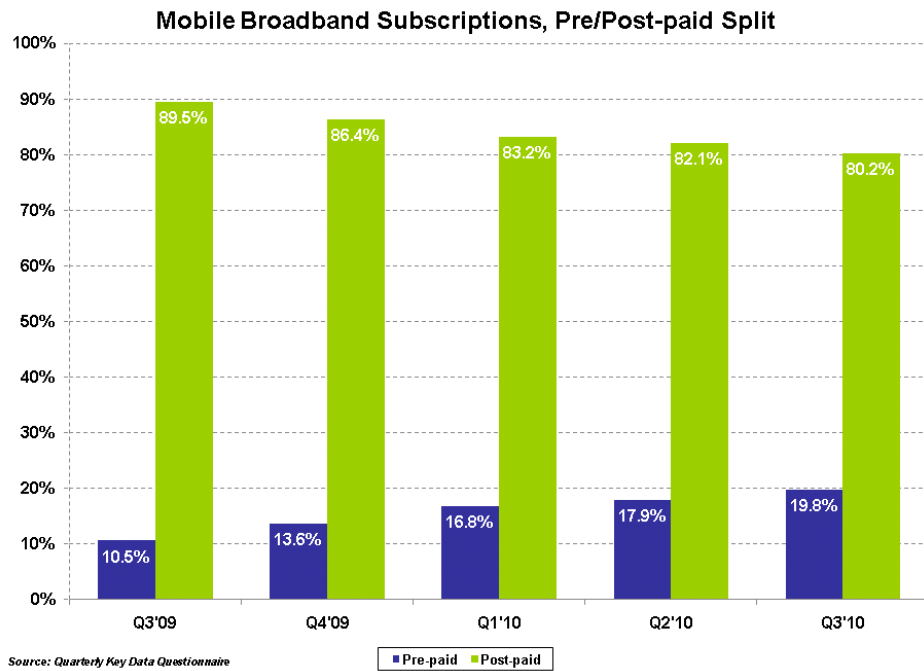


Figure 4.2.3 shows the split between pre-paid and post-paid mobile broadband subscriptions between Q3 2009 and Q3 2010. 80.2% of all mobile broadband subscriptions were post-paid at the end of September 2010, down from 89.5% one year previously.

Figure 4.2.3 – Profile of Pre-Paid and Post-Paid Mobile Broadband Subscriptions



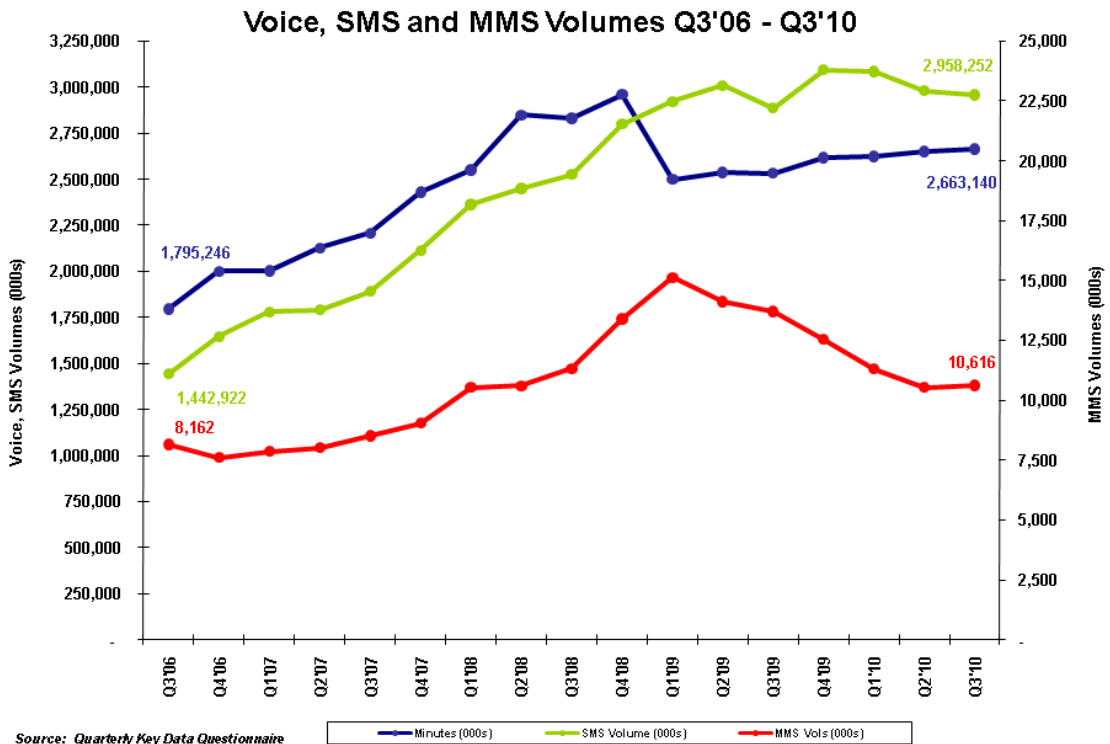
4.3 Mobile Volumes

Figure 4.3.1 illustrates the growth in voice minutes, SMS, and MMS (Multimedia Messaging Service) messages sent over mobile networks since Q3 2006. Total retail mobile voice traffic totalled over 2.66 billion minutes in Q3 2010, an increase of 0.5% on the previous quarter and an increase of 5.1% since Q3 2009.

The total number of SMS messages sent by mobile users in Ireland totalled just under 3 billion in Q3 2010, down (-0.7%) for the third successive quarter but up by 2.5% since Q3 2009.

The number of multimedia messages (MMS) sent increased slightly this quarter after a number of consecutive quarters of decline. Compared with the previous quarter, the number of MMS sent was up by 0.8% but down by 23% since Q3 2009. There were just over 10.6 million MMS messages sent during Q3 2010.

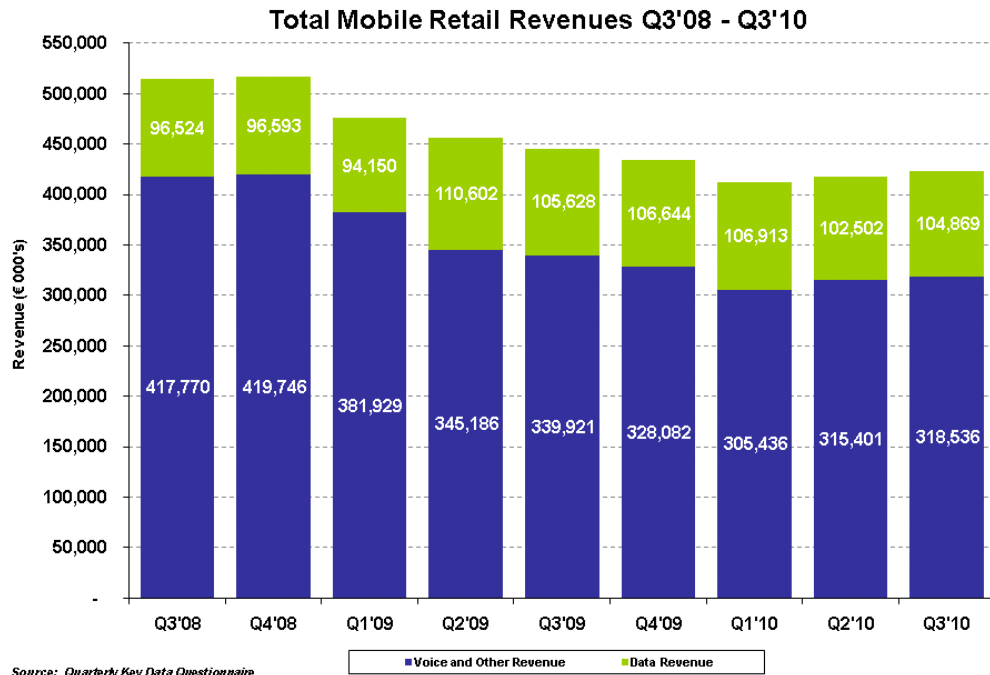
Figure 4.3.1 – SMS, MMS and Call Minute Volumes



4.4 Mobile Revenues

Figure 4.4.1 shows that mobile retail revenues for the quarter were just over €423 million at the end of Q3 2010, up slightly (+1.3%) on Q2 2010. Both data revenues²⁸ and voice and other revenues²⁹ have increased this quarter, up 2.3% and 0.9% respectively since last quarter. However, voice revenues are down by 6.3% since Q3 2009 while data revenues are down slightly by 0.7% in the same period.

Figure 4.4.1 – Total Mobile Retail Revenues



28 Messaging revenues (SMS and MMS) and mobile broadband and mobile internet services revenues.

29 Please note that since Q2'09 the voice and other category revenues includes voice call revenues and net handset sales revenues, connection and rental charges, premium rate SMS and MMS revenues, roaming SMS, MMS and data revenues. Handset sales revenues prior to Q2'09 were reported on a gross revenue basis.

Figure 4.4.2 outlines the percentage of mobile revenues attributable to all data revenues in the Irish market compared to fifteen other European countries, using data provided by Credit Suisse First Boston and includes data revenues not only from SMS and MMS messaging, but also data revenues from GPRS data services and 3G/mobile broadband data services.

Ireland ranks second only to the UK in comparison to other European countries in terms of the level of mobile data revenues as a percentage of overall mobile revenues. In Q2 2010, 32.8% (compared to 24.3% in Q2'08) of total mobile revenues was contributed by data revenues in Ireland, according to the Credit Suisse First Boston data.

Figure 4.4.2 - Data Revenues as % of Total Mobile Revenue

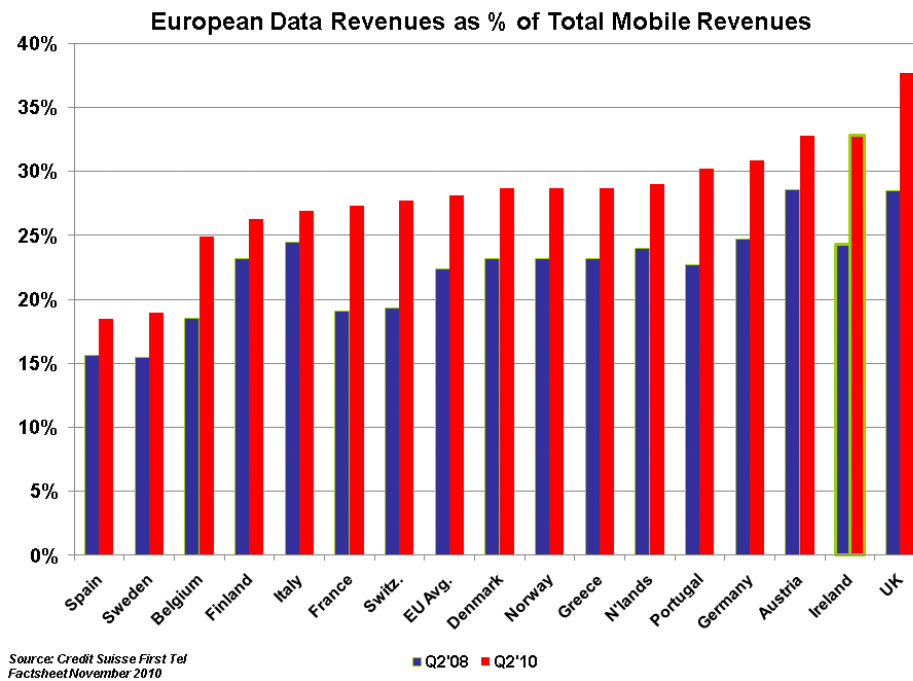
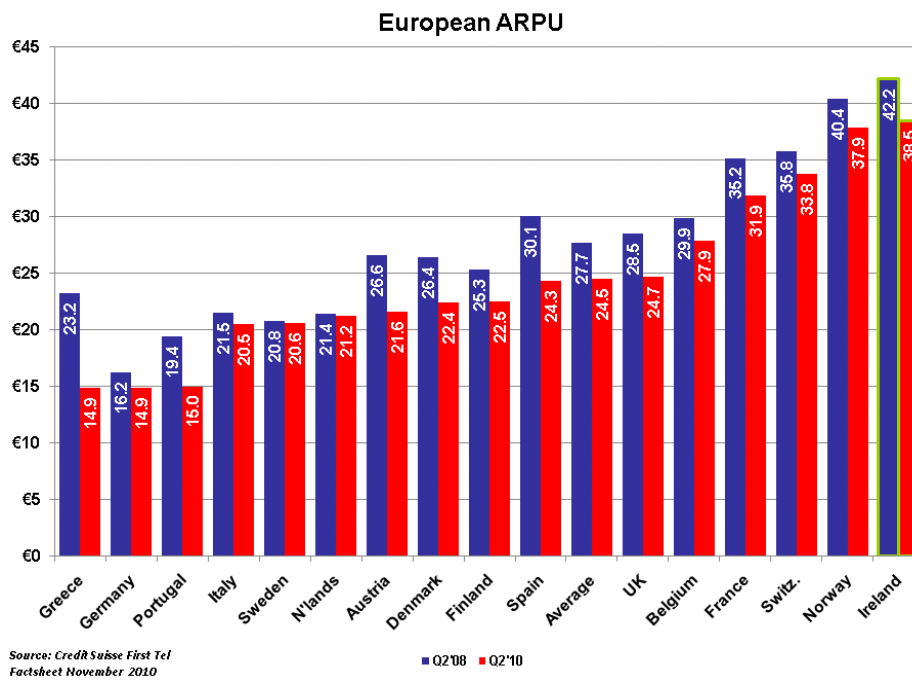


Figure 4.4.3 compares ARPU (average revenue per user) per month across sixteen European countries³⁰, including Ireland. Average revenue per user is an indication of average monthly revenue generated by mobile subscriptions in each country. While overall retail mobile revenues obtained from operators include handset sales revenues, the ARPU figures in this chart do not incorporate handset sales revenues.

As at Q2 2010, mobile ARPU in Ireland is estimated at €38.5 compared with €42.2 in Q2 2008, a fall of 8.8% in the last two years. The EU average ARPU is €24.5, according to the Credit Suisse First Boston data, down 11.6% on Q2 2008.

Figure 4.4.3 – European Comparison of ARPU



30 As far as possible, ARPU Figures are obtained directly from operators. Where unavailable, ARPU is calculated by dividing annual service revenues by the mid-term installed base (the sum of the opening and closing customer bases for the period divided by two). Once the Yankee Group has obtained or calculated all individual ARPU Figures, they are applied to each operator's mid-term user base to obtain service revenues by operator, which are then combined to obtain a country total. This total revenue figure is then divided by total mid-term users to derive country-level ARPU. Note that the graph includes all EU-15 countries except Luxembourg where no data was available.

4.5 Average Minutes of Use

Mobile monthly ARPU is a function of both the price of mobile services and the level of usage of mobile services. The most frequently used metric to determine levels of mobile telephony usage is monthly minutes of use. ComReg has collected monthly minutes of use data from all operators in the Irish market since Q1 2007. Further information on the definition and calculation of average minutes of use by ComReg is detailed in the explanatory memorandum which accompanies this report.³¹ Based on the data collected from operators, the average minutes of use in Ireland for Q3 2010 was just over 246 minutes per month, up 3.2% on the same period in 2009. No comparative data for other European countries is available for this quarter’s report.

4.6 Competition in the Mobile Market

Figures 4.6.1 and 4.6.2 outline mobile market shares based on the number of active subscriptions reported by each operator. Figure 4.6.1 includes mobile broadband while figure 4.6.2 excludes mobile broadband. Tesco Mobile’s subscription data is excluded in figures 4.6.1 and 4.6.2 and as of Q3 2009 Eircom mobile subscriptions are reported within Meteor’s data. Vodafone continues to have the highest market share including and excluding mobile broadband (40.5% and 42.0%), followed by O2 (33.2% and 33.8%), Meteor (20.1% and 21.4%) and 3 (6.2% and 2.8%).

Figure 4.6.1 – Market Share – Number of Subscriptions (inc. mobile broadband)

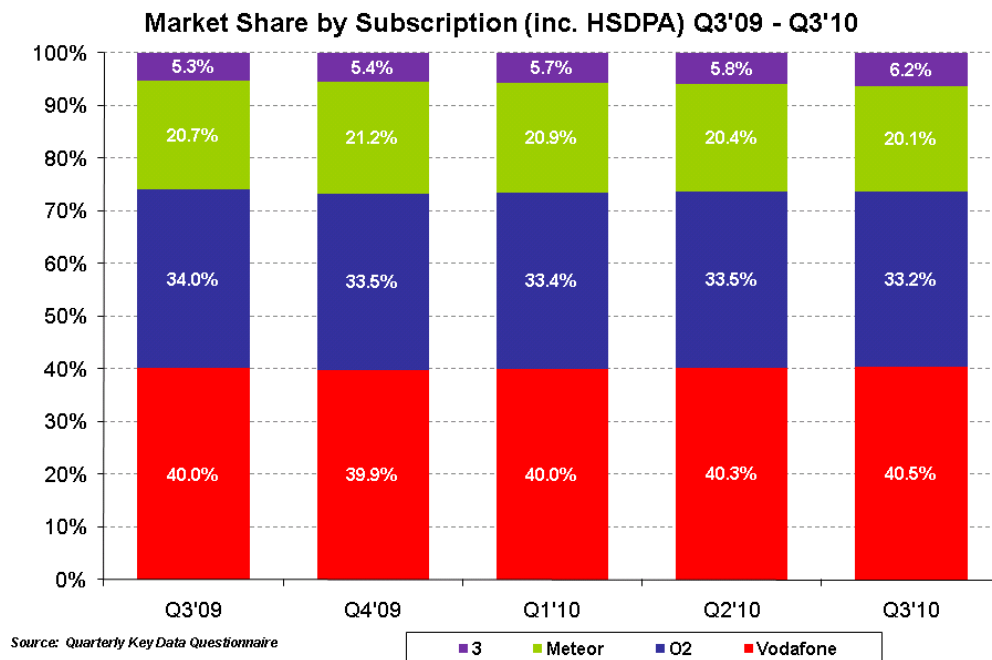


Figure 4.6.2 – Market Share – Number of Subscriptions (ex. mobile broadband)

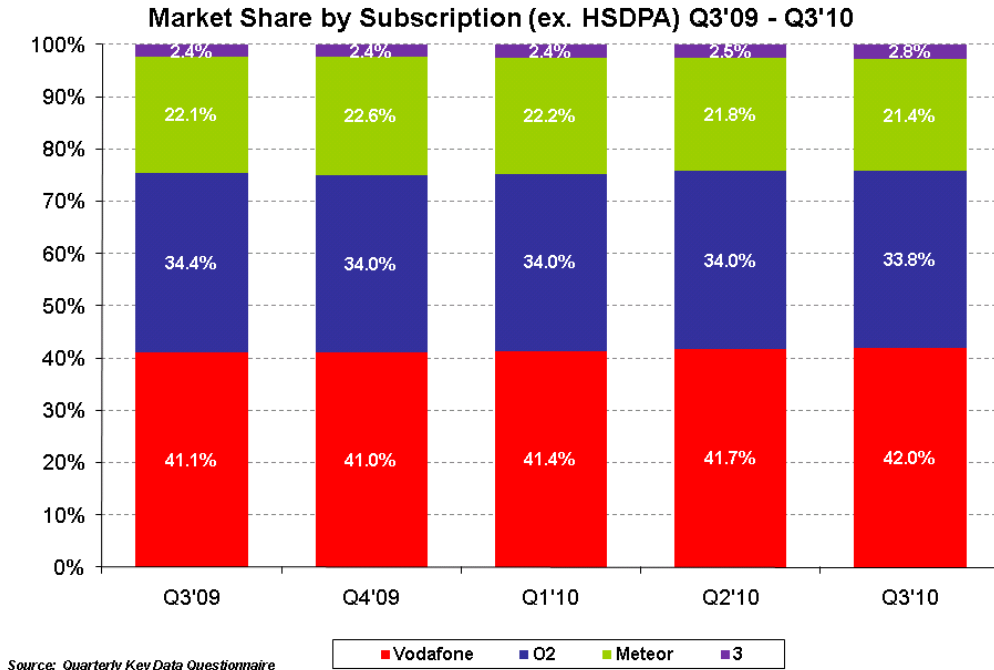
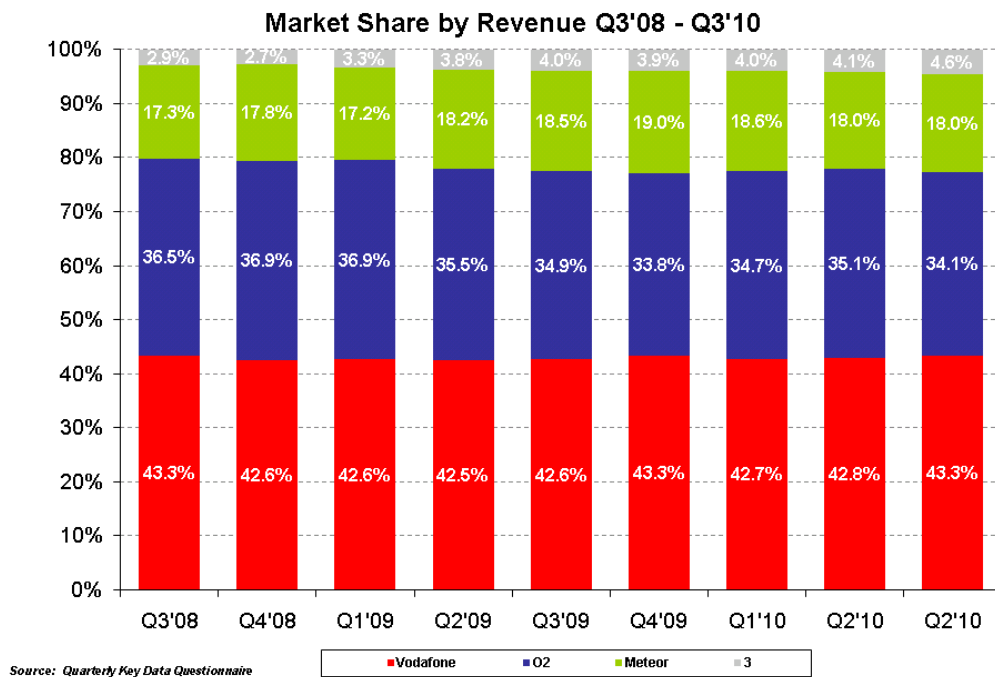


Figure 4.6.3 provides an analysis of market shares by revenue for mobile operators in the Irish market. Tesco Mobile is not included in this chart while Eircom Mobile data is reported within Meteor. Vodafone (up 0.5% points) and 3's (up 0.5% points) market shares increased slightly this quarter; Meteor's market share remained flat, while O2's market share fell this quarter (down 1.0% points).

Figure 4.6.3 – Revenue Market Share

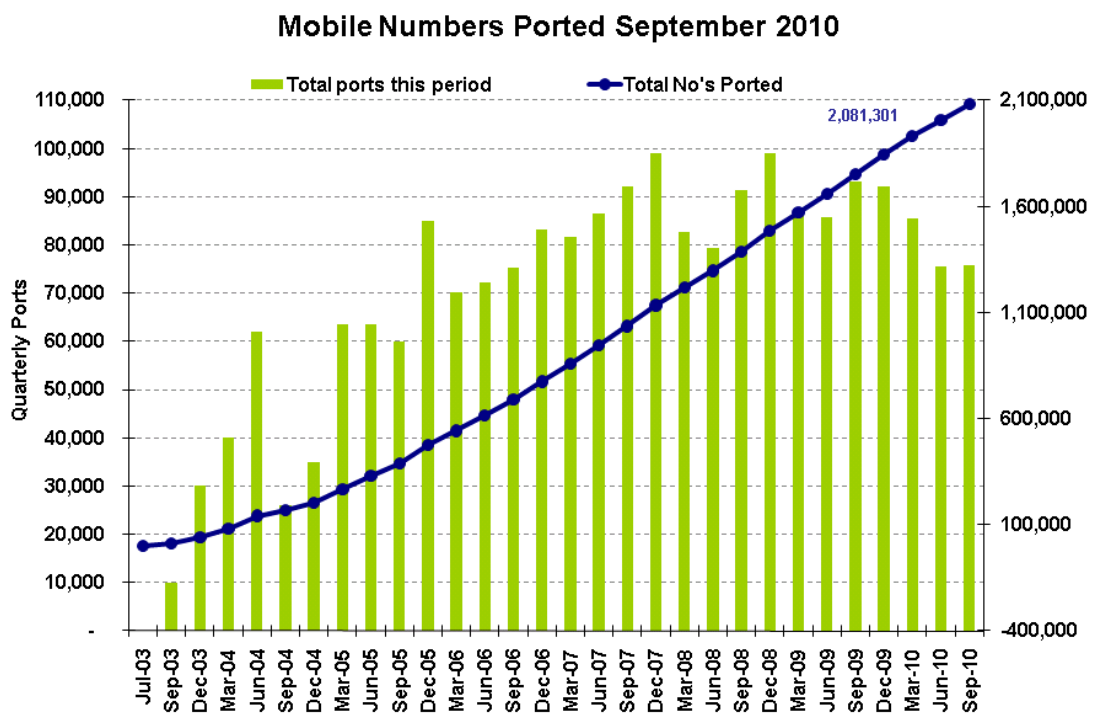


4.7 Switching in the Mobile Market

Figure 4.7.1 illustrates the cumulative total of mobile numbers ported between Irish mobile operators since the launch of Mobile Number Portability (MNP) in June 2003. MNP allows consumers to switch mobile operator while retaining their mobile number.

Over two million numbers have now been ported since June 2003. In the quarter to September 2010, 75,886 numbers were ported between operators (329,086 numbers in the 12 months to September 2010). Over the last 12 months an average of 82,272 numbers has been ported each quarter.

Figure 4.7.1 – Cumulative Mobile Numbers Ported



Source: Quarterly Key Data Questionnaire

4.8 Mobile Pricing Data³²

The OECD mobile pricing basket definitions have been updated by Teligen and were adopted by the OECD in March 2010. These definitions have been derived from data provided by operators and regulators in OECD countries, and have been reviewed by the OECD country authorities.

The OECD mobile baskets include at least 2 operators for each country. If those cover less than 50% of subscriptions in any country, additional operators may be included as well. All of the most common packages are included for each operator. This means that the current update covers over 2,000 packages across the 30 OECD countries. Both pre-paid and post-paid packages are included.

Mobile offers used are typically 2G and 3G services with the main focus on voice. The basket methodologies can be used to compare different types of offers such as pre-paid, post-paid or SIM-only plans. The new methodology used by the OECD/Teligen is based on the following baskets of calls:

Baskets
30 calls per month
100 calls per month
300 calls per month
900 calls per month
40 calls per month pre-paid basket
400 messages per month basket

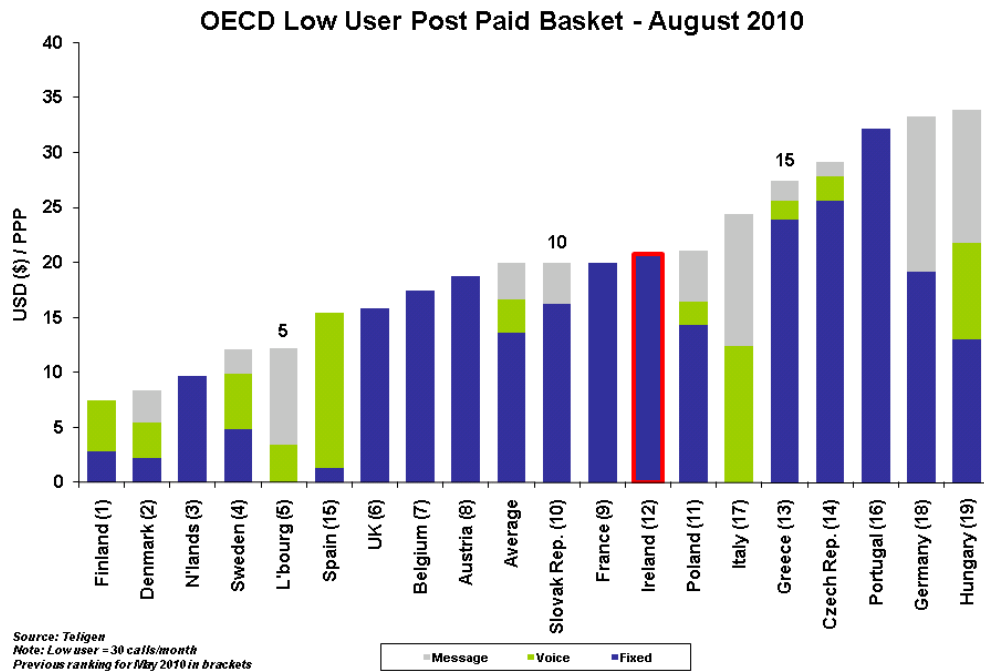
The Teligen mobile baskets presented in this Quarterly Report, termed as “low user”, “medium user” and “high user” are, based on the 30 calls, 100 calls and 300 calls per month baskets respectively described above. They are calculated and analysed independently by Teligen, using an OECD methodology which includes PPPs (Purchasing Power Parities) to reflect the real cost of mobile services compared to all other costs within a country.

³² The ‘Fixed’ component of price refers to the standard charges imposed by operators, regardless of the amount of calls made (i.e. connection and rental). Teligen’s calculation of this Figure is made up of: Installation Charge/5 + Rental charge for 1 year. The ‘Voice’ component of price refers to the charges imposed by operators, arising from the number of voice calls made by the user, while “Message” refers to the charges imposed by operators, arising from the number of SMS and MMS messages sent by the user.

4.8.1 Low User Post Paid Mobile Basket³³

For the “low user” post paid mobile basket, Ireland ranks in 12th position out of the European countries benchmarked, in the same position as May 2010. Ireland is three places behind the European average for this basket and is 3.7% more expensive than the average. The Irish package used this quarter is O2’s “Simplicity 100 30-day SIM Only” package.

Figure 4.8.1.1 - OECD Low User Post Paid Mobile Basket (30 calls)

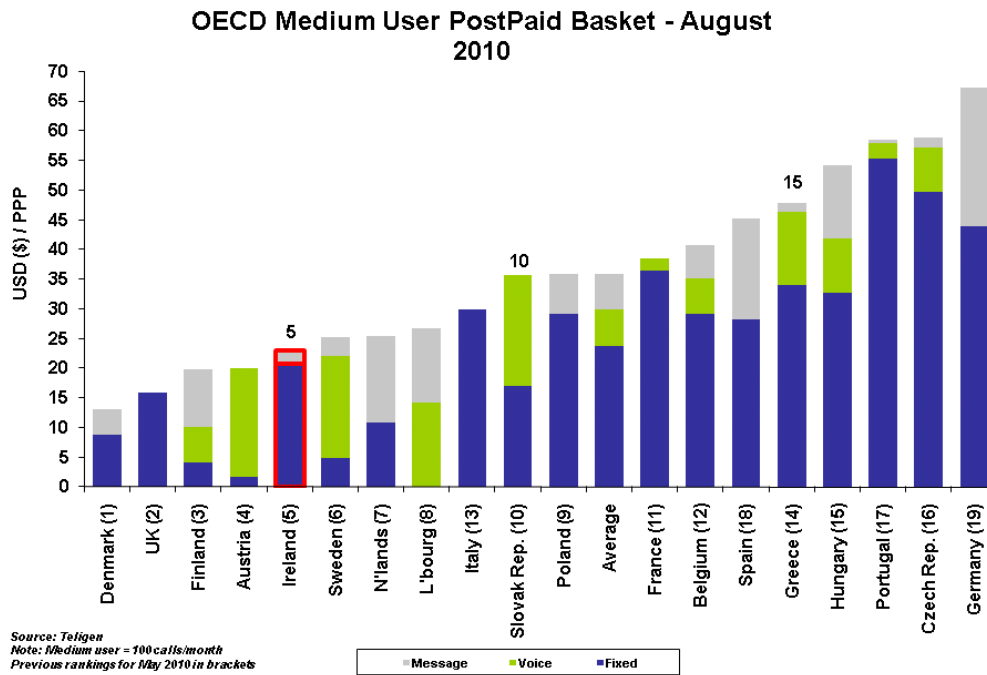


33 All tariffs are inclusive of VAT, rates will vary between Member States

4.8.2 Medium User Post Paid Mobile Basket

For the measurement of the “medium user” post paid mobile basket, Ireland ranks in 5th position out of the European countries benchmarked, in the same position as in May 2010. Ireland is seven places ahead of, and 56.2% cheaper than the European average. The package used for Ireland is Vodafone’s “Simply 100 30 day SIM only”.

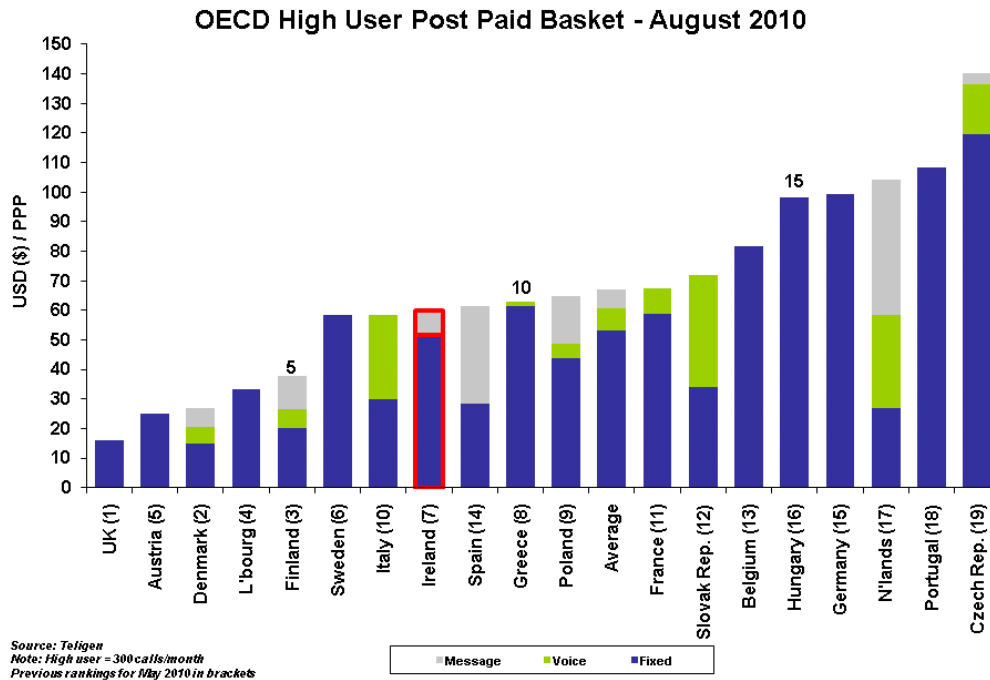
Figure 4.8.2.1 - OECD Medium User Post Paid Mobile Basket (100 calls)



4.8.3 High User Post Paid Mobile Basket

Ireland ranks in eight place among the European countries benchmarked in the “high user” post paid mobile basket, down one place since May 2010. The Irish package represented in the basket this quarter is O2’s “Clear 350 - Free on-net calls 18 month”. Ireland is four places ahead of the European average, approximately 12.4% lower than the average of the countries benchmarked.

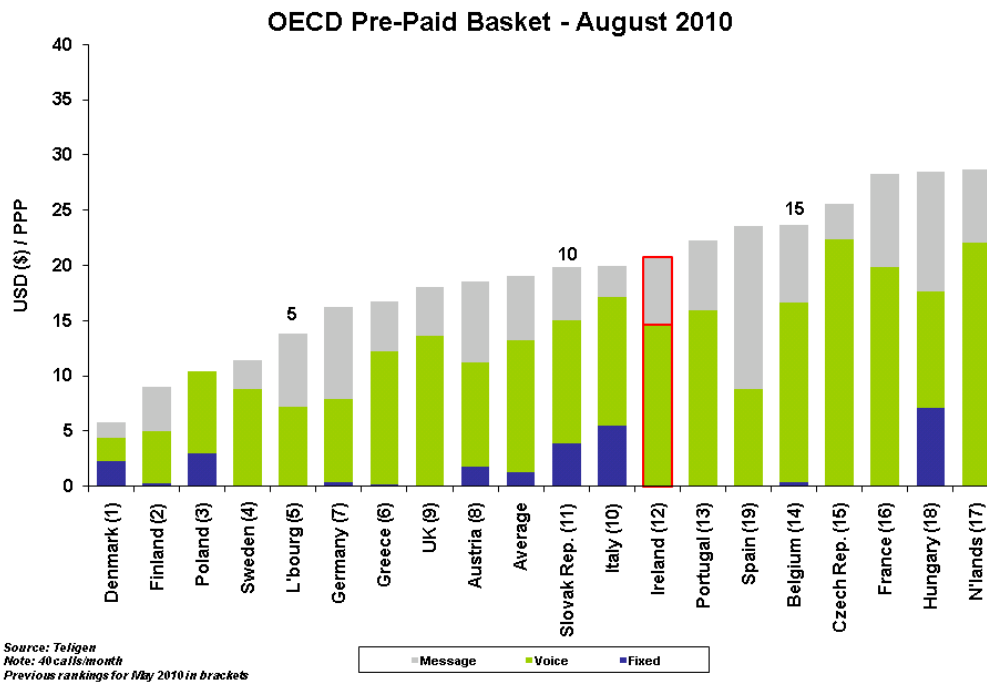
Figure 4.8.3.1 - OECD High User Post Paid Mobile Basket (300 calls)



4.8.4 Pre-Paid Mobile Basket

In the pre-paid mobile basket, Ireland is in 12th position among the European countries in this quarter’s rankings. The package used for Ireland in this basket is Vodafone’s “Advantage Plus+ on net calls and texts”. Ireland is three places behind the average of the countries benchmarked and the cost of this basket in Ireland is approximately 9.1% higher than the average.

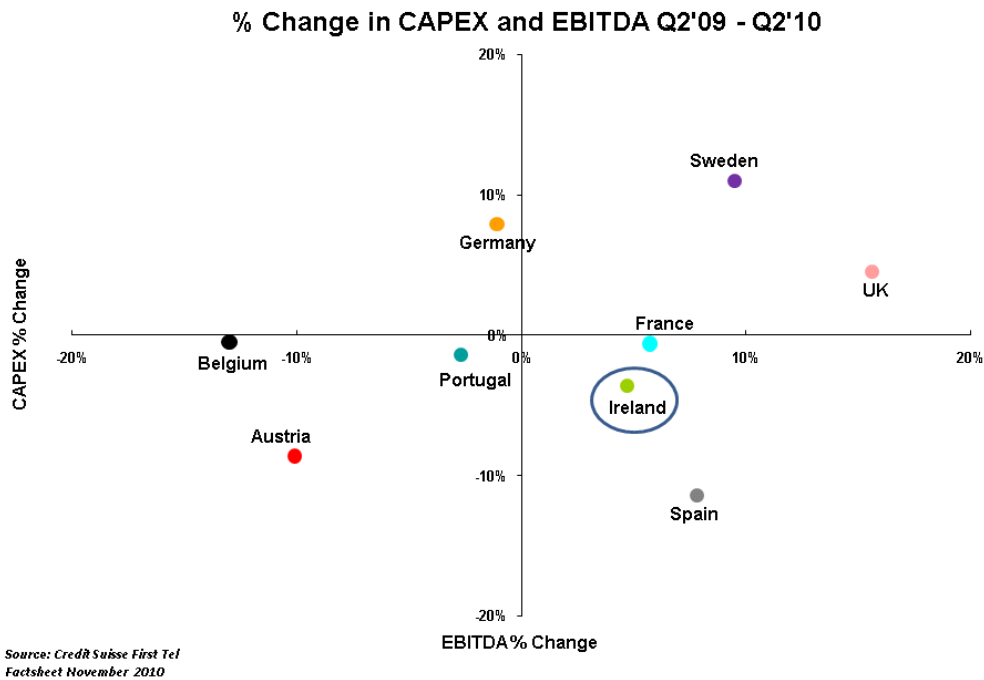
Figure 4.8.4.1 - OECD Pre-Paid Mobile Basket (40 calls)



4.9 European Mobile Capex and EBITDA

Figure 4.9.1 shows the change in mobile capital expenditure and earnings before interest, tax, depreciation and amortisation for European mobile operators between Q2 2009 and Q2 2010. Using data provided by Credit Suisse First Boston in its First Tel Factsheet report, the chart below shows that while Irish mobile operators have seen a decline in earnings over the year to June 2010, capital expenditure has actually increased.

Figure 4.9.1 – European Mobile CAPEX and EBITDA



5. Broadcasting

5.1 Overall Broadcasting Market

Data from the Nielsen TV Audience Measurement (TAM) Establishment Survey was first used in the Q4 2009 Quarterly Report for the broadcasting analysis in order to provide a comprehensive view of the TV market in Ireland.³⁴ The survey indicates that there are almost 1.59m TV homes in Ireland, which represents a 96% penetration rate of all households using the CSO's Quarterly National Household Survey of 1,651,000 households in Q1 2010. Figure 5.1.1 shows the estimated number of TV homes by reception type between September 2009 and September 2010 on the basis of the reception method through which the highest number of TV channels is received. Homes which receive Irish terrestrial TV channels only have declined by 1.4% between September 2009 and September 2010. While multi-terrestrial TV homes and analogue cable/satellite TV homes declined over the period, by approximately 29.1% and 42.9% respectively, multi-total TV homes remained unchanged due to increases in digital cable/satellite TV homes.³⁵

Figure 5.1.1 – TV Homes by Reception Type

	September 2010	September 2009	September 2010 as % of Total TV Homes	% Change Sep '09 – Sep '10
Reception	(000s)	(000s)	%	% change
Irish Terrestrial	206	209	13.0%	-1.4%
Multi Total	1383	1383	87.0%	0.0%
Multi Terrestrial	127	179	8.0%	-29.1%
Cable/Sat Analogue	153	268	9.6%	-42.9%
Cable/Sat Digital	1103	936	69.4%	+17.8%
Total Cable/Sat	1256	1204	79.0%	+4.3%
Total TV Homes	1589	1592		-0.2%
RECEPTION: This is determined by the channels the home receives.				
Multi Total: Made up of Multi Terrestrial homes plus Cable/Satellite homes and is therefore any home which receives more than just the four Irish terrestrial channels (RTÉ1, RTÉ2, TV3, TG4).				
Irish Terrestrial Homes which only receive the four Irish terrestrial channels (RTÉ1, RTÉ2, TV3, TG4).				
Multi Terrestrial: Homes which receive at least one of the UK channels (BBC, UTV, Channel 4, HTV, S4C, Channel 5), but do not receive any Cable/Satellite channels.				
Cable/Satellite: Homes which receive any Cable/Satellite channels (Sky One, Sky News, Sports channels, MTV, E4, Movie channels, etc.).				
Digital: Have digital reception either via satellite dish or cable service.				

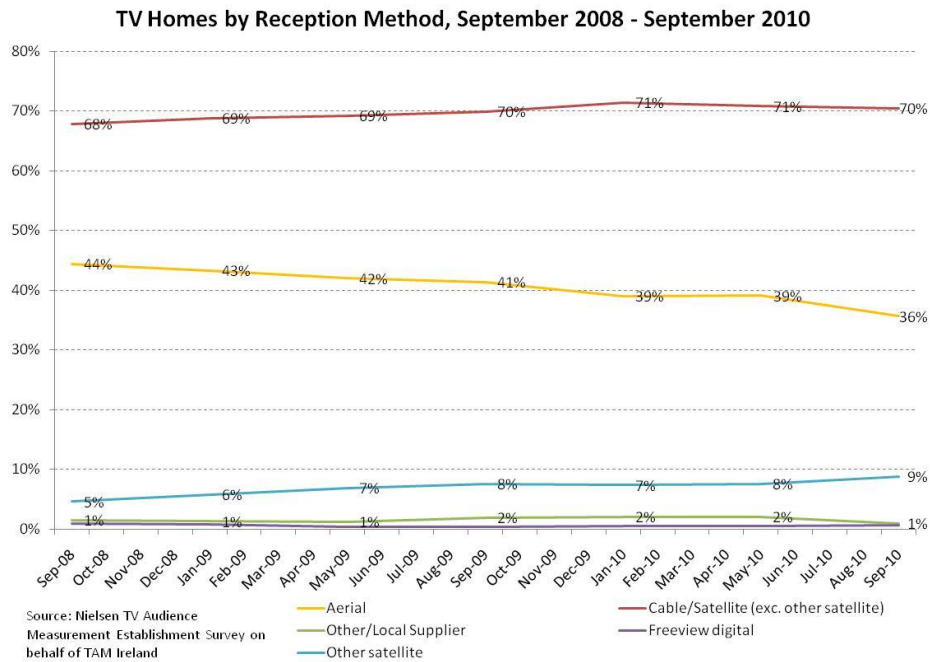
Source: Nielsen TV Audience Measurement Establishment Survey on behalf of TAM Ireland

34 The Establishment Survey is a survey produced by Nielsen TV Audience Measurement (fieldwork is carried out by Behaviours and Attitudes) on behalf of Television Audience Measurement Ireland Ltd (a TV ratings body). The Establishment Survey covers areas such as ownership of TV related equipment, method of TV reception and demographics of TV household individuals such as age etc.

35 MMDS (Multichannel Multipoint Distribution Service) is included under cable/satellite. MMDS is a wireless telecommunications technology, used usually in sparsely populated rural areas, where laying cables is not economically viable.

Figure 5.1.2 charts TV homes by reception method ³⁶ from September 2009 to September 2010. The percentage of cable/satellite TV homes has increased by two percentage points over the period, while those homes that receive TV by terrestrial aerial have fallen by eight percentage points. Other satellite (free to air satellite services and don't knows) have been increasing over the period, while other/local supplier (deflector/relay services) reception methods have fallen slightly.

Figure 5.1.2 – TV Homes by Reception Method



³⁶ This is determined by the method by which homes with a TV receive their channels. Each home can have more than one method of reception. e.g. aerial and cable or digital satellite, digital satellite and cable, etc. The question is asked for their main and up to 9 TV sets. For this reason, the total for the reception methods adds up to more than 100%.

Figure 5.1.3 shows that, despite a slight dip in late 2009, the total number of TV homes has continued to grow, increasing by 9.1% between January 2007 and September 2010. The growth in digital TV homes in the same period has been strong, increasing by 87.3%. The number of TV homes that receive supply through more than one platform has also grown strongly, increasing by approximately 18.5%. The data suggest that 70% of TV homes are digital.

Figure 5.1.3 – TV Homes January 2007 – May 2010

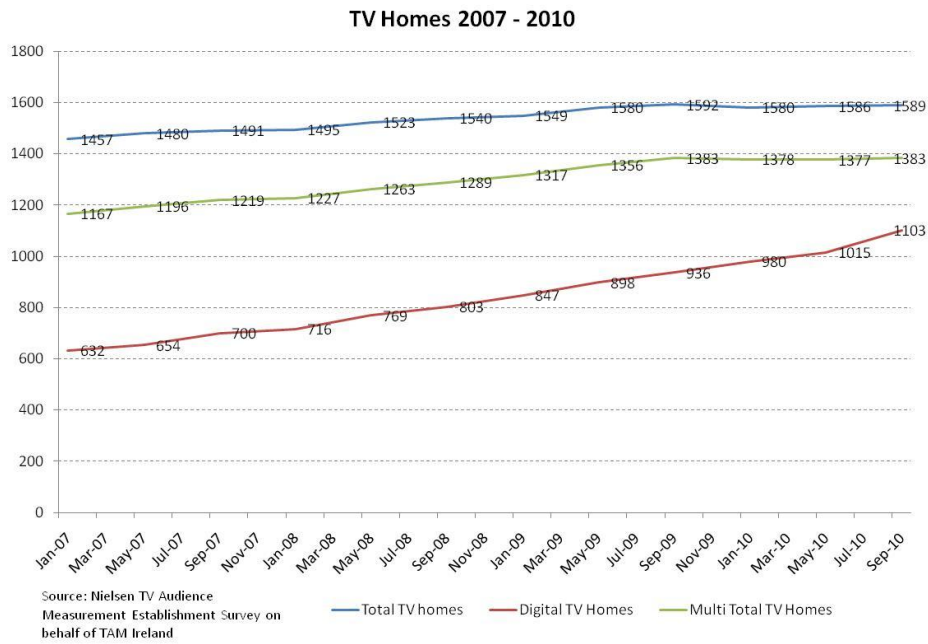
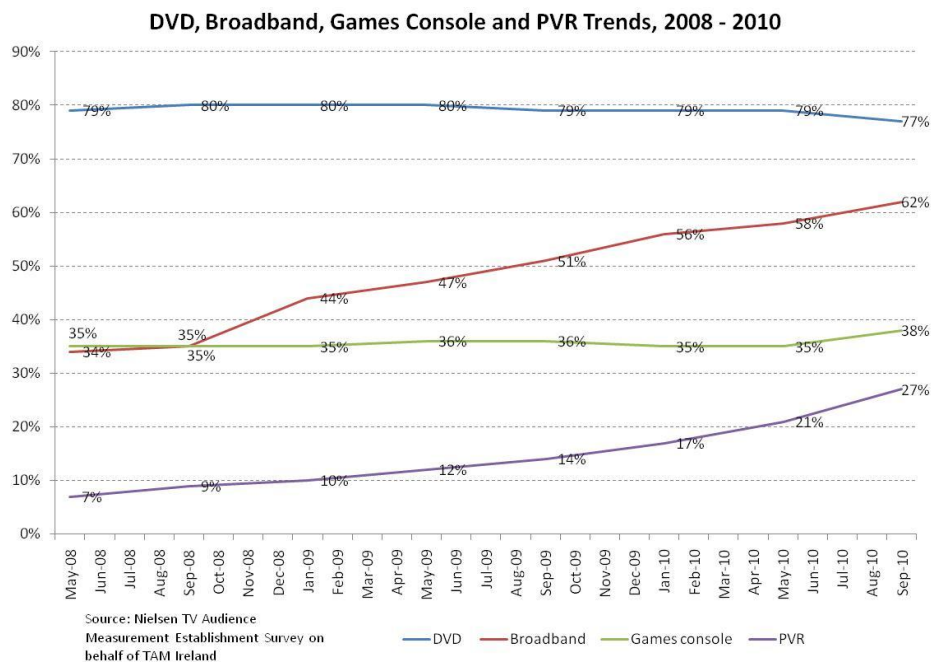


Figure 5.1.4 shows TV homes by DVD, broadband access, game console and PVR³⁷ ownership between May 2008 and September 2010. Almost eight in ten TV homes have a DVD player though this has been declining to a small extent over the last year. Broadband access continues to increase reaching 62% of homes with a TV in September 2010.

Both games console and PVR ownership continue to increase, reaching 38% and 27% respectively in September 2010.

Figure 5.1.4 – DVD, Broadband, Games Console and PVR Trends



³⁷ A PVR is an electronic device used to record media digitally. The PVR is also known as a digital video recorder or DVR. A PVR records and plays back television programmes, but, unlike the VCR, it stores the programs in digital rather than analogue format, for example, SKY+Box, or UPC Digital Video Recorder.

Figure 5.1.5 shows the level of household penetration of pay TV services and terrestrial free to air TV services in Ireland based on the number of channels received. This chart has been derived by ComReg using Nielsen data and is not a classification used by Nielsen or a classification used as part of the survey itself. Pay TV homes (cable and satellite TV homes) continue to increase at the expense of terrestrial free to air TV homes (Irish terrestrial and multi terrestrial TV homes). It should be noted that the proportion of pay TV homes is likely to be over-stated as it may include free to air type satellite services such as freesat, where an initial payment is made with no recurring payments.

Figure 5.1.5 – Pay TV vs Terrestrial Free to Air TV Homes, 2008 - 2010

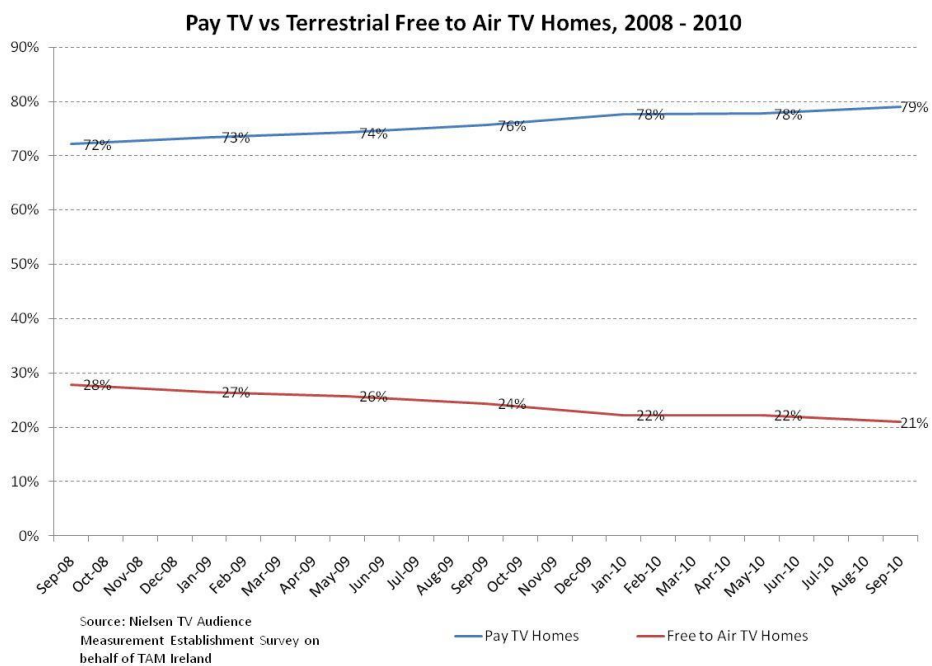
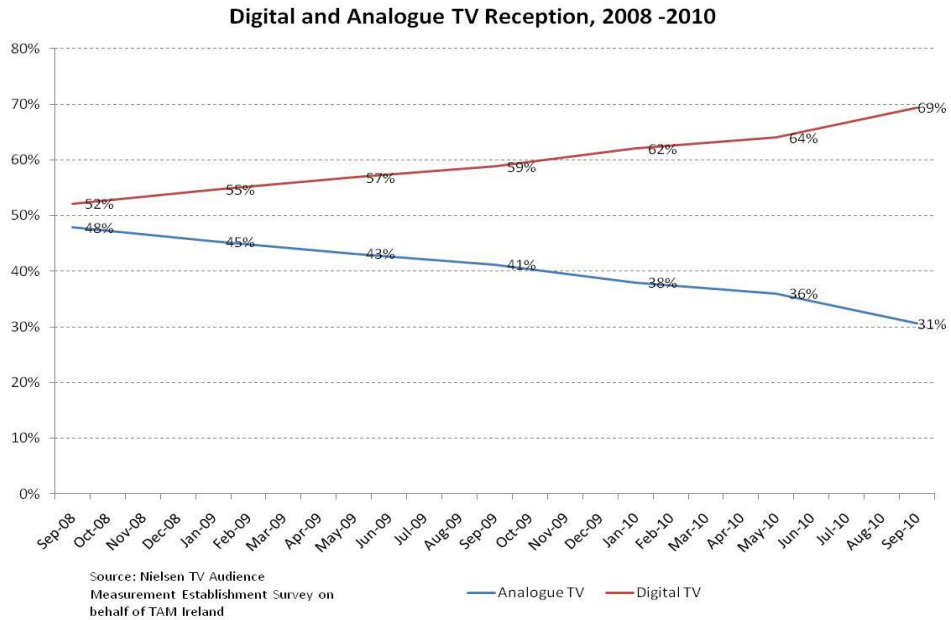


Figure 5.1.6 shows the proportion of digital to analogue TV reception methods in Ireland across all platforms including cable and satellite. Digital TV reception continues to increase at the expense of analogue TV reception.

Figure 5.1.6 – Digital and Analogue TV Reception, 2008 - 2010



6. Appendix

Aggregated SB-WLR Performance Statistics, as supplied by Eircom, are published in accordance with ComReg Decision Notice (07/61) Section 6.6 (vii).

Performance metrics: Q3 2010

Jul-10

Order Type	% Orders Validated within Performance Target	% Orders Delivered within Performance Target
DR	-	99.85%
LE	-	99.77%
PW	-	99.71%
LNI/LTI/MI	-	99.02%
LNI/LTI/MI	-	99.80%
CL	-	99.63%
LNN/LTN/MN	100.00%	95.71%
CH	-	99.53%
CN	-	98.44%
CM	-	99.97%
FA	-	100.00%

Aug-10

Order Type	% Orders Validated within Performance Target	% Orders Delivered within Performance Target
DR	-	99.92%
LE	-	100.00%
PW	-	97.18%
LNI/LTI/MI	-	93.33%
LNI/LTI/MI	-	99.90%
CL	-	99.97%
LNN/LTN/MN	100.00%	91.88%
CH	-	99.85%
CN	-	100.00%
CM	-	100.00%
FA	-	88.89%

Sep-10

Order Type	% Orders Validated within Performance Target	% Orders Delivered within Performance Target
DR	-	99.95%
LE	-	98.22%
PW	-	99.82%
LNI/LTI/MI	-	99.38%
LNI/LTI/MI	-	99.92%
CL	-	99.96%
LNN/LTN/MN	99.52%	96.48%
CH	-	99.94%
CN	-	98.17%
CM	-	100.00%
FA	-	90.91%

Count of Time Interval	SB-WLR Repair performance metric Qrt 3 Jul - Sept 2010		
QRT 3 2010	Percentage of faults		
	<=2	<=5	<=10
Grand Total	75.61%	93.54%	98.68%

Glossary

DR	Data request: supply of list of numbers, DDIs/MSNs and Ancillary Service for a customer account
PW	Provide Wholesale Line Rental (WLR) and Carrier Selection (CS)
CH	Modify or provide Ancillary Services
CL	Cease Line
LTN	Provide WLR and Carrier Pre-Selection (CPS) and additional line to a specified Customer Account (Non-In-situ)
LNI	Provide WLR and Carrier Pre-Selection (CPS) and new line to a new Customer Account (In-Situ)
LTI	Provide WLR and Carrier Pre-Selection (CPS) and additional line to a specified Customer Account (In-Situ)
LNN	Provide WLR and CPS and new line to a new Customer Account (Not In-Situ)