



Commission for  
**Communications Regulation**

## Information Notice

### **Status Update on Local Loop Unbundling - Issue 2**

<b>Document No:</b>	<b>06/30</b>
<b>Date:</b>	<b>6 July, 2006</b>

## Table of Contents

1. Executive Summary .....	2
1.1. MAIN DEVELOPMENTS.....	2
1.2. OTHER ISSUES AND NEXT STEPS .....	3
2. Background .....	3
3. Consumer Right to keep the existing phone number when switching to another operator (GLMP) .....	3
4. Coexistence of Line Share and WLR.....	4
5. Performance issues around the standard LLU Products.....	5
6. Ability to move seamlessly between operators and products .....	7
7. Next Steps .....	7
8. Appendix 1 - Summary of Key LLU Milestones .....	8

## 1. Executive Summary

In May 2006, ComReg published [Information Notice 06/21](#) which set out the then status in relation to a number of issues associated with Local Loop Unbundling. In that document ComReg also undertook to publish every month a progress report against the various milestones that were set.

### 1.1. Main Developments

Over the past five weeks (up to 30 June 2006) there has, in ComReg's view, been a considerable level of engagement by all parties with some thirteen industry meetings having been held. While much work remains to be done to ensure that these activities are translated into tangible benefits at the service level, progress is being made in a number of areas<sup>1</sup>, including:

- **Number Portability and LLU (known as GLMP):** The development of the GLUMP product (which will allow consumers to retain their telephone number when moving to an operator's retail service which is based on LLU) while is on schedule for launch (trial phase) on 8 August 2006. However, there are still some risks associated with a number of issues which are being addressed as a matter of priority by ComReg.
- **Co-existence of Line Share and Wholesale Line Rental:** On 19 June, *eircom* introduced the facility to allow the LLU Line Share (LS) product to be ordered by operators where Single Billing-Wholesale Line Rental (SB-WLR) is already on the telephone line (and vice versa). This allows operators to provide a combined telephony and broadband services to consumers using these two wholesale products. Two operators have signed amended LS contracts with *eircom* for the provision of this service and orders are now progressing through the provisioning process.
- **Ongoing provisioning problems associated with the existing LLU product:** There continue to be ongoing delivery problems associated with the standalone LLU product, mainly resulting in delayed delivery of orders and performance standards which generally fall short of those specified in industry agreed inter-operator processes and wholesale Service Level Agreements (SLAs). For the month of June, 16% of orders were provisioned outside of the delivery timeframes specified in the *eircom* SLA<sup>2</sup>. While there has been constructive engagement by all sides this has not yet translated into operational results and the momentum achieved to date must be maintained to achieve this. It is extremely important that measurable improvements are realised quickly and a clear timetable to reach acceptable performance standards is being developed.
- **Migrations and Wholesale Product Combinations:** ComReg stated in 06/21 that it would to address the issue of migrations between wholesale products and would communicate in more detail on the matter as part of its July status update (to be published in August). This is still ComReg's intention.

---

<sup>1</sup> See Appendix 1 for a list of milestones previously published in Information Notice 06/21, along with the status of their progress

<sup>2</sup> The SLA specifies that LLU orders are to be delivered on the 10<sup>th</sup> working day following Order Acknowledgement by *eircom*.

## 1.2. Other Issues and Next Steps

Other issues such as the LLU Collocation Product (which allows operators to place their equipment in *eircom*'s exchanges) and its supporting processes have also been discussed at several workshops and proposals for developing these areas of the LLU product suite are being actively pursued within industry.

Over the coming weeks, the industry focus will be to continue to address the necessary developments to facilitate the GLUMP launch on 8 August, as well as the equally important parallel activities to deal with the operational and product issues associated with the standalone LLU product. In addressing these issues, the focus must be to develop LLU products and processes that support an efficient customer experience at the retail level.

The next report will be published by 7 August.

## 2. Background

Currently four operators have signed wholesale contracts with *eircom* for the provision of LLU services. Three of these operators (BT Ireland, Magnet, Smart Telecom) are actively providing retail services based on LLU to consumers and, in doing so, have collocated their equipment in 95 locations across approximately 57<sup>3</sup> *eircom* exchanges. The remaining operator (Colt Telecom) has recently commenced the unbundling process and is developing its collocation plans.

In May 2006, ComReg published [Information Notice 06/21](#) which set out the then status in relation to a number of issues associated with Local Loop Unbundling, in particular:

- Number Portability and LLU (known as GLMP)
- Co-existence of Line Share and Wholesale Line Rental
- Ongoing delivery problems associated with the existing LLU product
- Wholesale Product Combinations & Migrations

This Information Notice reports on the developments since the publication of 06/21.

## 3. Consumer Right to keep the existing phone number when switching to another operator (GLMP)

Consumers have a right to keep their existing fixed line telephone number when switching between fixed line service providers. The process which is in place to enable this right to be delivered is known as Geographic Number Portability (GNP). While GNP and LLU have both been available for a number of years, the current market requirement is for an integrated industry solution which will allow a customer to take a broadband and telephony service, through LLU, without having to give up their existing telephone number. This integrated solution for combining GNP and LLU is referred to as GLUMP.

---

<sup>3</sup> These figures are based on data supplied by Access Seekers. *eircom* have complete collocation at other exchanges but Access Seekers are still in the process of bringing these sites into service. The number of cases of collocation is greater than the number of exchanges as more than one operator can be located at the same *eircom* exchange.

Since the issue of the last Information Notice in May, five GLUMP specific industry meetings (chaired by ComReg), have been held to agree the development of the product and its supporting operational processes. This has involved a significant volume of work, resource commitment and co-operation by all the parties, particularly in light of the necessity to complete the development work in time for the trial launch by *eircom* on 8 August next. Activities to date have resulted in the development by industry of:

- a detailed GLUMP product description
- an operational process manual to support the ordering and delivery of GLUMP
- an inter-operator testing plan and schedule

These and a number of other key areas are still being worked on (code of practice covering interactions with consumers, actual inter-operator testing etc.) and, while it is anticipated that these will be completed over the coming weeks, all operators need to maintain the necessary level of commitment to complete these work streams. Following the launch of the trial, order volume capabilities are to be incrementally increased to 120 per day (the existing standalone LLU product, i.e. without number portability, operates in parallel without any order volume limitations) and, after a stable period of operation, these are to be further reviewed.

As outlined in May last, ComReg also intended that performance metrics on a range of parameters associated with GLUMP provisioning and its ongoing management would be published. Such parameters are being discussed with industry and ComReg expects them to be finalised over the coming weeks. However, the publication of performance metrics can only take place after the August product launch.

ComReg has also noted previously that the GLUMP product to be launched on 8 August will require further development within a reasonable timeframe in order to upgrade it to a more robust, unconstrained mass market solution with lower levels of manual intervention and less process complexity. *eircom* has previously committed to industry commence work on this phase of development and *eircom* is to table proposals and timetables to facilitate this no later than 8 August 2006.

#### **4. Coexistence of Line Share and WLR**

Following industry agreement at the end of May last, *eircom* committed to introduce a facility which would allow Line Share and Single Billing-Wholesale Line Rental (SB-WLR) services to be provided on the same telephone line.

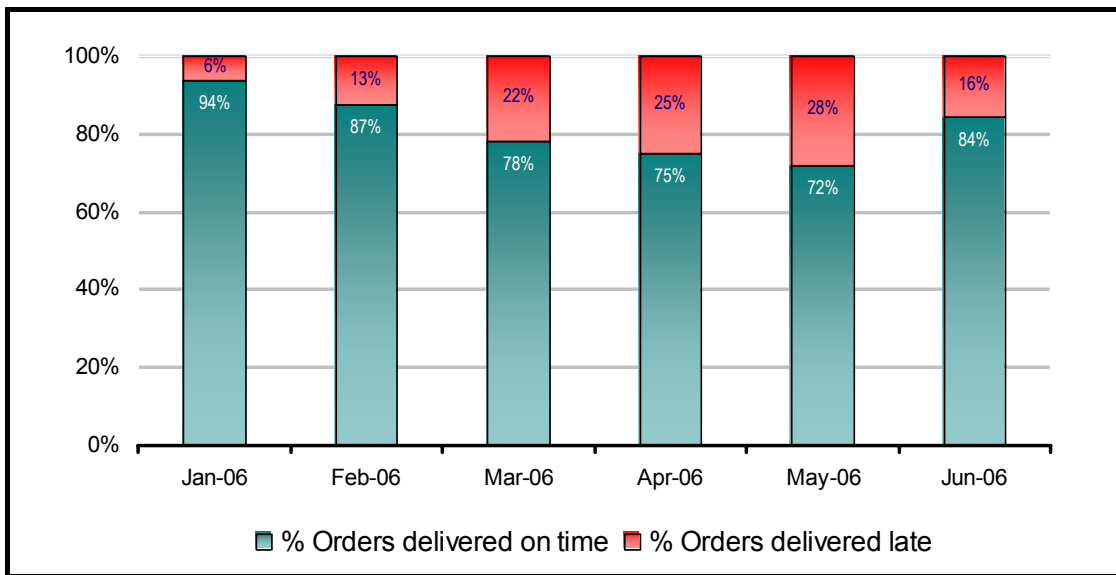
On 19 June, *eircom* made this facility available to operators and ComReg understands that 2 operators have since signed the necessary wholesale contracts for this service. Operators have placed LS orders which are now progressing through the delivery process. ComReg intends to track performance and to address any issues that may arise through the LLU Industry Forum (See Section 5 below).

## 5. Performance issues around the standard LLU Products

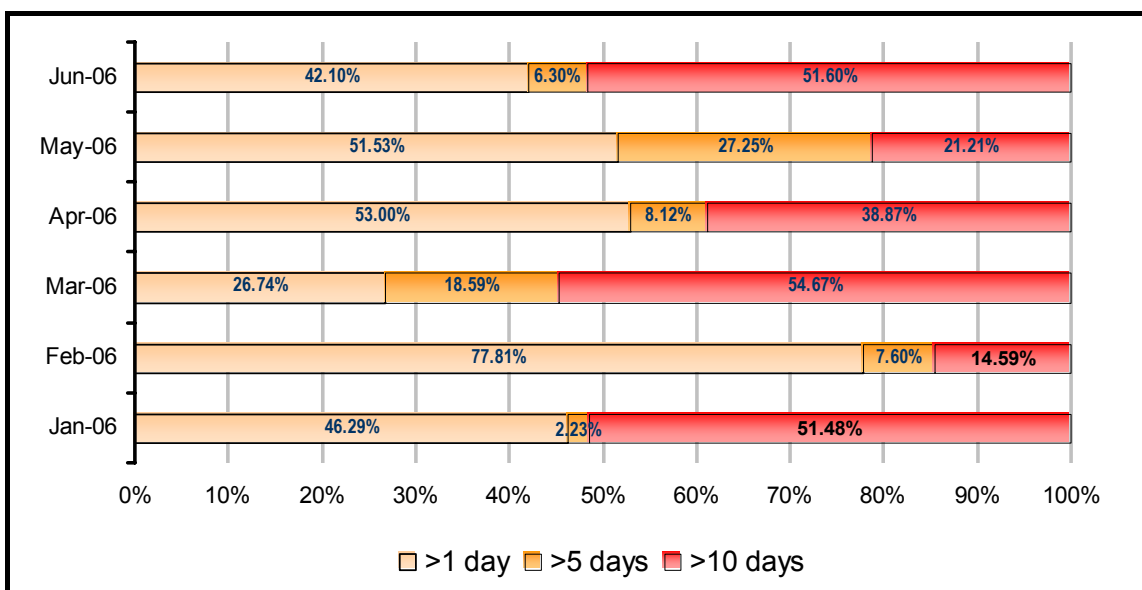
At the last update, ComReg noted that the ordering, delivery and “in service” performance of the existing LLU product was falling short of the standards set out under industry agreed inter-operator processes and wholesale service level agreements. Many of these processes will also be relevant to the operational side of the GLUMP product so their efficient operation is of critical importance to the broader aim of an efficiently operating suite of LLU products.

Based on figures supplied by eircom to ComReg, the recent performance with respect to LLU delivery can be summarised as follows.

**Table 1: Percentage of LLU orders delivered within SLA Timeframe**



**Table 2: Of LLU orders delivered outside SLA (per Table 1), percentage delivered >1 day, > 5 days, > 10 days beyond SLA timeframe**



All parties agree that current performance is unacceptable and to date there has been evidence of co-operation and a willingness to tackle the problems. A good start has been made but, while it is inevitable that resolution will take time, nevertheless it is imperative that we see a measurable improvement soon. ComReg notes that an upcoming industry meeting will seek to discuss and agree a timeframe for dealing with the issues and ComReg would expect to be in a position to report on the timetable as part of its next update. Tangible progress on improved order provisioning times has yet to be achieved on a consistent basis and ComReg considers that improvements in service levels provided by *eircom* to operators must be achieved in the short term.

The data above has been presented in such a way as to protect any commercially confidential information that may exist for the parties (it should also be noted that operators have not corroborated the performance data). There are also other measurements which could be also be used to track performance. While the data shown above is useful and provides a preliminary basis for month on month comparison going forward, ComReg acknowledges that is incomplete in certain respects. For example, it does not distinguish between the various categories of LLU order types which would provide greater transparency of underlying performance; nor does it for example, include information in relation to orders accepted/rejected which would provide an indication of order submission quality.

It has not been possible to publish more detailed information on this occasion either because of concerns around commercial confidentiality which have not been resolved or because the data is not currently generated by *eircom* information systems. ComReg is obliged to take account of commercial confidentiality in deciding what data to publish but will progress this matter further during July.

While the data above reflects the current situation in relation to LLU service performance (i.e. prior to any process improvements taking place), it clearly highlights the unacceptable service levels which are inconsistent with an efficient and effectively functioning product. This poor delivery performance is partially attributable to poorly defined and/or implemented supporting operational processes, however, these are being addressed by industry and the key priorities have been agreed. While *eircom* also pays penalties to operators where they do not meet the performance criteria set out in their SLA, operators have highlighted that they are more interested in having the provisioning performance improved. The evidence to date is that there is willingness on the part of *eircom* (within whose control most of the work rests given it is the wholesale supplier) and the other operators to work towards the immediate improvement of the situation. Nevertheless, much remains to be done.

To address these problems, ComReg established a separate Industry Forum which has met on five occasions over the last month. Industry have been working together in a proactive and co-operative manner and have identified a range of issues which need to be addressed, mainly surrounding the development of poorly defined and/or implemented supporting operational processes. An initial set of issues have been prioritised by industry and the preliminary development work will focus these, including:

- Ordering LLU on spare paths (where the customer does not currently have service but there is an in-situ or pre-cabled telephone line at the premises)
- Improving communications during the order delivery/management process which will facilitate more efficient retail customer management.
- Cessation processes for certain wholesale services (bitstream etc) and their impact on the LLU provisioning process (and vice versa)
- Processes for allowing consumers to move from LLU based retail services back to an *eircom* PSTN service (known as the ‘return path’)

Timely results can be achieved by ensuring that adequate resources are in place to deliver improvements that meet customer’s reasonable product requirements and ComReg has received commitments from *eircom* in this regard.

As the development of solutions to these and other issues are introduced, they should manifest themselves in improvements in ordering, delivery and “in service” performance. The ongoing publication of performance metrics will allow such progress to be tracked and will provide transparency to all parties during this transition.

Over the coming weeks, ComReg and industry will continue to address issues through the industry forum with a view to achieving meaningful improvements in performance in the short term. ComReg will be closely monitoring the work of the Forum and intends to provide further updates on progress in the next monthly report. However, ComReg expects there to be noticeable improvements on the current level of service being provided by *eircom* to operators.

## **6. Ability to move seamlessly between operators and products**

Operators have requested that it should be possible for their customers to move from one set of services provided over a particular set of wholesale inputs to services provided over a different set of wholesale inputs without experiencing significant inconvenience (this is referred to as Wholesale Migrations and Product Combinations).

ComReg considers that there is considerable benefit in facilitating these requests, particularly as (amongst other things) it minimises the impact of disruption of service for consumers, reduces barriers to switching and ultimately contributes towards the development of a more dynamic and competitive market.

ComReg will further address the issue of migrations as part of its July status update (to be published in August).

## **7. Next Steps**

In order to provide clarity on overall progress, ComReg will continue issue monthly status reports on all the issues discussed above. Each status report will issue within 5 working days following the end of the preceding month.



## 8. Appendix 1 - Summary of Key LLU Milestones

No.	Milestones as per <a href="#">Information Notice 06/21</a>	Status
1.1	ComReg to call a GLMP industry meeting for 31 May 2006 to develop an interim product.	Completed on target
1.2	<i>eircom</i> , in co-operation with Access Seekers, to deliver an interim GLMP solution with Trial a launch date by 8 August 2006.	Ongoing: on schedule
1.3	<i>eircom</i> , in co-operation with Access Seekers, to commence work on the delivery of a long term fit for purpose GLUMP solution by 8 August at the latest. A comprehensive draft project plan which will set out the key milestones to achieve this aim will be required.	Ongoing: To be started
1.4	ComReg to publish performance metrics on GLMP as part of LLU status update reports (see Section 7).	Ongoing: To be started
1.5	<i>eircom</i> to introduce ability for Line Share and SB-WLR to be ordered on the same telephone line by 19 June 2006 at the latest.	Completed on target
1.6	ComReg to convene an LLU process working group for 31 May 2006 to review and where necessary improve or develop processes to resolve operational problems around the provisioning and repair processes.	Completed on target.  This Forum is continuing to meet to address issues.
1.7	ComReg intends that performance metrics regarding the ongoing provision of LLU should be published as part of regular updates on the status of LLU (See Section 7 of <a href="#">Information Notice 06/21</a> ).	Ongoing: on schedule
1.8	ComReg will communicate in more detail on next steps in relation to wholesale product migrations as part of its July status update (or earlier if possible).	Ongoing: on schedule
1.9	ComReg to issue monthly LLU status reports on progress on the issues highlighted in this information note. Each status report will issue within 5 working days following the end of the preceding month	Ongoing: on schedule