



Commission for
Communications Regulation

Information Notice

Status Update on Local Loop Unbundling - Issue 5

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1. Introduction

In September 2006, ComReg published its fourth Local Loop Unbundling status update ([Information Notice 06/50](#)) which set out the then situation in relation to a number of issues. This update reports on developments since then. LLU is one of the key building blocks which underpins choice and innovation in the broadband market, however, ComReg is increasingly concerned that the speed of overall progress on improving service delivery and tackling the associated process issues remains disappointing.

2. Summary of Developments

It was previously reported that 3 LLU operators are actively providing LLU based services to customers, namely, BT Ireland, Magnet Entertainment and Smart Telecom. 109 instances of collocation have been provided to these operators by eircom across approximately 64¹ exchange locations. This represents an increase of 4 instances of collocation on August's figure and demonstrates operators' continued commitment to rolling out their own network infrastructure via LLU

During September, progress across a range of activities associated with the development of LLU has been slower than expected, although the commitment from industry to resolving many of the issues remains. Several industry meetings were held over the period, including meetings between ComReg and individual operators. In summary, the following developments have occurred.

2.1. Number Portability and LLU (known as GLUMP)

The GLUMP product (enabling customers to retain their telephone number when moving to an operator's retail service which is based on Local Loop Unbundling) was launched by eircom in August 2006 and, to date, it has been mainly utilised by Magnet Entertainment. Orders continue to progress, however, at relatively low but increasing volumes.

It is recognised that the current GLUMP solution is highly manual in nature and as a consequence the throughput capability of the product is designed to ramp up over time in light of operational experience. Throughput has just been increased to 60 orders per day, and while this is welcome, the manual elements of the process and the lack of effective service level agreements around this interim product still suggest the need for an improved solution, currently referred to as Phase 2. To this end, industry have been discussing the development of this more efficient, volume based GLUMP product (through partial or full automation) and on 20 September eircom presented to industry the outputs of their analysis of potential options. In summary, two phases of development have been proposed.

Improvements to the existing GLUMP product, mainly improving the various Access Seeker ordering interfaces by automating them on an electronic gateway, as well as moving some of the existing order processing steps currently managed by Access Seekers to eircom. Following industry agreement, eircom are to introduce these enhancements in January 2007 as part of the next version release of its order management gateway.

¹ Figures are based on data supplied by Access Seekers. 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.

The second phase of development proposed by eircom would build on the enhancements above and further simplify the GLUMP product and its supporting processes by eliminating some activities carried out by Access Seekers to support number portability². However, eircom's position is that a number of criteria must be met prior to engaging in this development phase which, amongst other things, include a requirement that the existing throughput capability of the current manual GLUMP product is exhausted. eircom has also stated that development would then take approximately 12 months to complete. Such conditions are unacceptable to industry and to ComReg. Discussions are continuing and it remains the views of Access Seekers and ComReg that the timely implementation of Phase 2 is a clear requirement having regard to the consumer needs for a near seamless and high quality switching experience.

2.2. Ongoing provisioning problems associated with the existing LLU product

The standalone LLU product continues to experience problems associated with delayed delivery of orders, with the percentage of orders delivered within SLA timeframes falling to 88% for the month of September, representing a 5% decrease on the previous month (further details are set out in appendix 1³). Looking at the delivery situation over a longer time horizon, only 81% of total LLU orders delivered over the last six months (April to September 2006) were within SLA timeframes.

Furthermore, eircom's LLU fault management performance also continues to be poor. Figures up to the period June 2006⁴ previously showed that 67.94% of LLU faults were cleared within two working days. The figures for August and September are 58.79% and 60.65% respectively.

Performance levels for both delivery and fault management are unacceptable to Access Seekers and ComReg and are clearly inconsistent with the quality of service that is necessary to support a customer driven LLU service experience. eircom needs to demonstrate to its wholesale customers its commitment to providing a quality LLU service experience and put in place the necessary measures to significantly improve performance levels in the near term.

Over the last month ComReg has continued to work with the industry on key product enhancements to improve overall LLU service delivery performance. Solutions have been identified which will require a combination of inter-operator industry process and IT systems developments. Some of the process developments will be published as part of the next release of the LLU Industry Process Manual (IPM) which is scheduled for release in November 2006. These include improvements around customer communications, issue escalation procedures and more streamlined provisioning of order information. However, a number of the enhancements will require IT systems development within eircom and for which eircom have yet to provide a definitive, early date. Given the disappointing trend in performance statistics, ComReg expects that best endeavours will be made by eircom to introduce these product requirements as a matter

² Such activities currently arise in light of existing eircom system limitations and involve the call diverts being applied by Access Seekers during the delivery GLUMP process

³ This data has been presented in such a way as to protect any information considered by ComReg to be confidential (it should also be noted that operators have not corroborated the performance data).

⁴ Previous figures supplied by eircom for June 2006 showed that only 64.7% of LLU faults were cleared within two working days. eircom notified ComReg in September that it had discovered errors in the data underlying this figure and, as a consequence it has been revised to 67.94%

of urgency. Other product issues are also still under discussion at the industry forum and will form part of the Industry work programme.

2.3. Migrations and Wholesale Product Combinations

Operators have requested the ability to provide LLU based retail services to consumers who may already have a retail service which is underpinned by a different retail product. Facilitating consumer choice without any deterioration of service ought to be one of the core values in a modern properly functioning telecommunications market, irrespective of which wholesale service underpins the retail product offering.

ComReg has set out its views in Issues 3 and 4 of its LLU Status Updates regarding the process to be followed in pursuing the issue of migrations, in particular, that each individual Access Seeker request would preferably be progressed and resolved by way of commercial negotiation pursuant to eircom's existing obligations in [Decision Notice D8/04](#)⁵.

Access Seekers formally submitted their individual LLU access requests to eircom by 7 September and indicated their willingness to enter discussions to deal with practical issues which may arise during the developments necessary to support the requested access to LLU

ComReg undertook to monitor the commercial discussions and earlier this month wrote to all the parties requesting individual updates on the status of the engagements, if any, that have taken place between eircom and each Access Seeker concerning their access requests. Copies of all relevant correspondence and background material were also sought, including details from Access Seekers of their order volume forecasts and timing requirements, along with any other technical considerations that may be relevant. While correspondence between eircom and Access Seekers has been exchanged, no constructive engagement appears to have taken place between the parties. ComReg reiterates its view that the lack of a resolution of this issue is causing an unwarranted restriction of consumer choice and is damaging to the interests of end users.

The parties are in the process of providing updates to ComReg. In parallel with this, ComReg has also engaged in discussions and correspondence with eircom regarding its LLU regulatory obligations. ComReg will be reviewing the information received and, in light of this, will consider the regulatory implications having regard to eircom's regulatory obligations under [Decision Notice D8/04](#). This may also include further requests for information from the parties. ComReg will provide an update on the situation in the next Status Update.

3. Other Issues and Next Steps

Over the coming weeks, the Industry focus will be to continue to address the next phase of GLUMP development as well as ongoing work to implement necessary process improvements to the standalone LLU product. Collocation process issues will also be address through the industry forum.

The next report will be published by 15 November.

⁵ Designation of SMP and Decision on Obligations – Market Analysis: Wholesale unbundled access (including shared access) to metallic loops and sub-loops; Document 04/70; D8/04

Appendix 1: LLU Service Performance Statistics

Tables 1 and 2 set out service delivery performance for LLU orders and table 3 sets out LLU fault repair performance. These figures have been provided by eircom to ComReg.

Table 1: Percentage of LLU orders delivered within SLA Timeframe

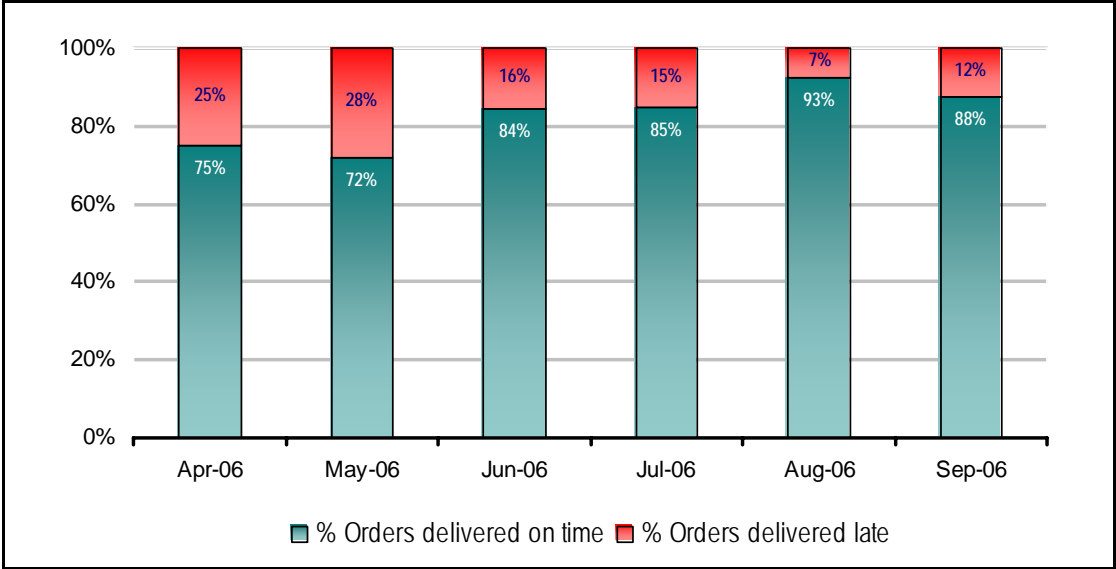


Table 2: Of LLU orders delivered outside SLA (per Table 1 equates to beyond 10 days), percentage delivered > day 11-15, day 16 to 20, day 21 and above

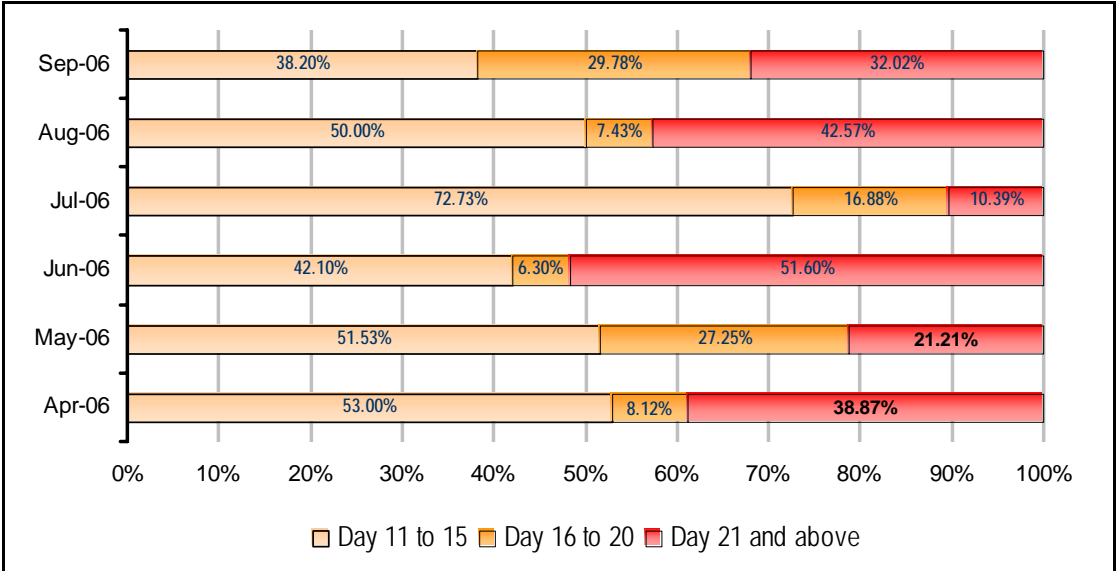


Table 3: % of Total LLU orders delivered within SLA for period April – September 2006

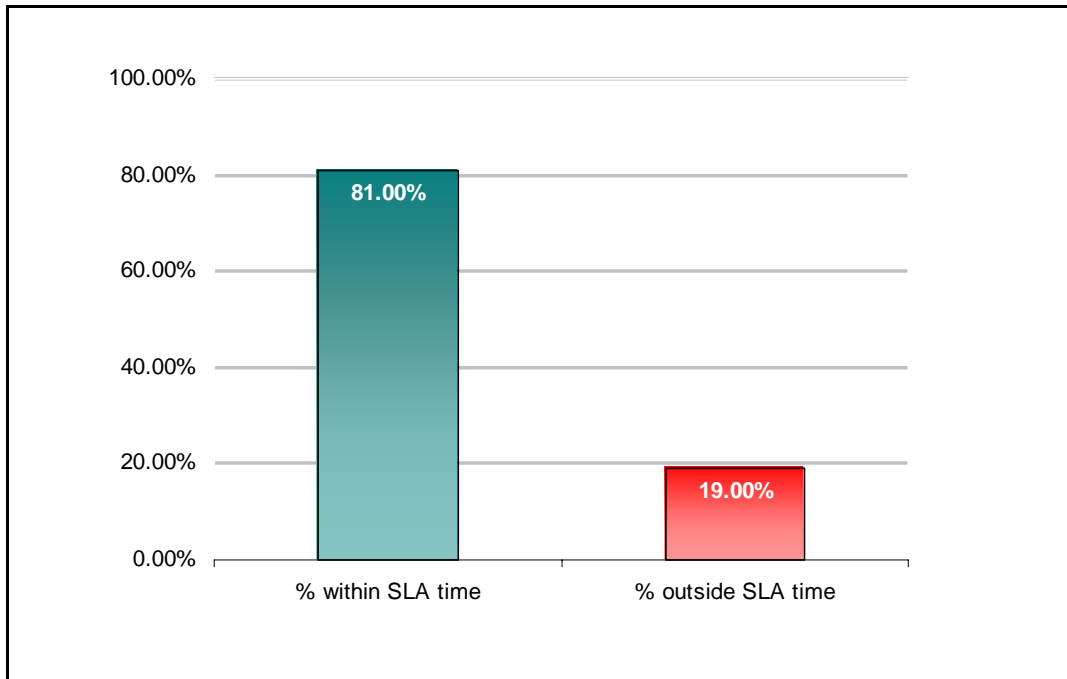
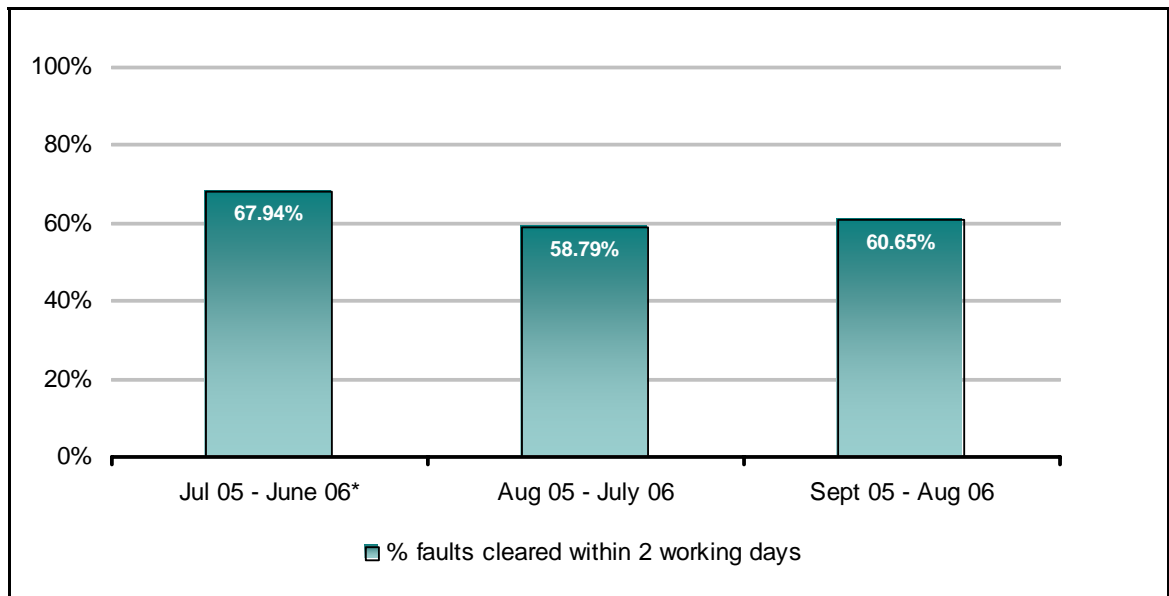


Table 4: Monthly % of LLU faults repaired within 2 working days (averaged over 12 Months)



* Fault management performance figures up to the period June 2006 previously showed that only 64.7% of LLU faults were cleared within two working days. eircom notified ComReg in September that it had discovered errors in the data underlying this figure and, as a consequence it has been revised to 67.94%