



Commission for
Communications Regulation

Guidance Notes

Telecommunications Licences Guidance Notes for Applicants

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1. Introduction

This paper provides additional information to people intending to apply for a licence to provide telecommunications services to the public. These notes should be read in conjunction with the following:

- 98/45R: “Application for a Basic Telecommunications Licence”;
- 98/46R: “Application for a General Telecommunications Licence”;

This document is structured as follows:

- Section 2 considers the licences available;
- Section 3 considers application procedures;
- Section 4 considers the information required from applicants.

This document is provided for the sole purpose of providing guidance to applicants for telecommunications licences when they apply; it is not a legal document. The guidance given may be amended from time to time and is without prejudice to the legal position or the rights and duties of the Commission for Communications Regulation (“the Commission”) to regulate the market generally.

Where there is doubt as to whether a service is voice telephony, or where a voice telephony service might be provided in the future, it is suggested that applicants apply for a General Telecommunication Licence as this will provide the greater flexibility and covers a broader range of services. Potential applicants who are uncertain whether the services they propose are licensable under this regime should provide details (comparable to that requested in the application forms) to the Commission for its consideration and advice

Please submit all queries (by post, fax or email) relating to these guidelines or the applications procedure to:

Ms. Sinéad Devey, The Commission for Communications Regulation, Abbey Court, Irish Life Centre, Lower Abbey Street, Dublin: (+ 353 1) 8049621 Email: sinead.devey@comreg.ie

2. The Licences

The regime under which applications are sought includes two types of licence. Both will be granted under the Postal and Telecommunications Services Act 1983 (“the 1983 Act”) as amended. They are as follows:

- (a) A **General Telecommunications Licence**. This licence will permit its holder to provide telecommunications networks and services to the public (including voice telephony) where these require the allocation to users of numbers from the national numbering scheme and will be issued under section 111(2) of the 1983 Act.
- (b) A **Basic Telecommunications Licence**. This licence will permit its holder to provide other licensable telecommunications networks and services to the public and will be issued under section 111(3) of the 1983 Act.

Further details clarifying the scope of the licences is given below.

2.1 Exclusions

These application procedures specifically exclude the following:

- Mobile services and networks¹: these are currently covered by separate licensing arrangements, although this regime is to be reviewed;
- Telecommunications services and networks excluded under section 4(A) of the Telegraph Act of 1869. These exceptions include:
 - Services and networks for own use;
 - Broadcasting where licensed under relevant legislation;
 - Radio communications systems licence under the wireless telegraphy regulations;
 - Cable television system licensed under appropriate legislation.

This licensing regime addresses telecommunications service provided to the public. A number of points of clarification need to be made as follows.

A telecommunications service involves the transmission and/or routing of signals on a telecommunications network between defined termination points. A decision on whether a service is a telecommunications service will need to be taken by the Commission on a case-by-case basis from the information provided in licence applications. The provision of service to the public will be interpreted in the sense that the service is not limited to a specific person or entity. By way of illustration, the following services are unlikely to be considered telecommunications service offered to the public:

- A call centre engaged only in providing telemarketing operations on an agency basis;
- A simple audiotext service where accessed is provided using a third party premium rate service;
- A landlord providing a shared PABX service to the tenants of a building or campus;

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2.2 General Telecommunications Licence

The General Telecommunications Licence will permit organisations to apply for numbers and allocate these to users. Anyone wishing to provide voice telephony or intending to provide a public telecommunications network as strictly defined in the 1983 Act must also be licensed under section 111(2) and will therefore need to have a General Telecommunications Licence. Voice telephony is defined in Irish and EU law. The Commission issued clarification of the definition in September 1997 (Decision Notice: D1/97 Voice Telephony in the Irish Telecommunications Market - 97/11).

Voice telephony is: *The commercial provision for the public of the direct switching of speech in real time between public switched network termination points enabling any user to use equipment connected to such a network termination point in order to communicate with another termination point.*

Given the complex and rapidly developing nature of telecommunications technology and the services and the rate at which new service offerings can be developed, the Commission recognises that there can be difficulties in categorising any particular service offering. Service Providers of indirect services may find that some questions on the General Application Form are not relevant to them, and should respond accordingly.

¹ The licences will, however, cover satellite ground systems and services delivered over these.

2.3 Basic Telecommunications Licence

The Basic Telecommunications Licence will permit all other licensable telecommunications services offered to the public. Many value added service providers will be able to operate under this licence.

A Basic Telecommunications Licence holder is not excluded from building infrastructure.

A Basic Telecommunications Licence holder may apply for a General Telecommunications Licence at any stage in the future.

2.4 Other licences that may be required

Networks and services using radio-based infrastructure, whether licensed under Section 111 of the 1983 Act or exempted under Section 4A of the 1869 Act, will require to be licensed under the Wireless Telegraphy Act 1926. Separate application procedures exist in this area, details of which can be obtained from the Commission.

Licences relating to broadcasting, cable television, MMDS or mobile services and networks may also be required. Again details are available from the Commission.

2.5 Treatment of existing licences

This licence regime is intended to replace any licences issued by the Commission under section 111(3) of the 1983 Act to provide Telecommunications Services for the Public (often referred to as a 'VAS Licence') and to establish a Telecommunications Network (often referred to as an 'Infrastructure Licence'). Both licences currently remain valid until 30 June 1999. The new licence regime also permits the provision of voice telephony services which prior to 1 December 1998 could only be provided by Telecom Éireann.

If an applicant has existing VAS and/or Infrastructure licence(s), a new licence(s) will be issued to it, only when existing licences are relinquished. This is to avoid confusion as to what may or may not be permitted. Organisations may, of course, choose to continue to operate under existing licences. However, if they wish to provide voice telephony, want numbers or wish to continue to operate after 30 June 1999, an application for a new licence must be made.

3. Application procedures

As has already been mentioned the licences for telecommunications services will be issued by the Commission under the provisions set out in the Postal and Telecommunications Services Act 1983 (“the 1983 Act”). This act allows for two types of licence, each of which has a different application process. Licences issued under Section 111(2) of the 1983 Act (the General Telecommunications Licence) are individually granted by the Commission. Licences under Section 111(3) of the 1983 Act (the Basic Telecommunications Licence) require Applicants to make a declaration. Once the Commission is satisfied with the form and detail of a declaration, the licence will be deemed to have been granted at a date following the declaration. Applicants for either licence should submit 3 copies of the application to the Commission, clearly marked ‘Telecommunications Licence Application’ which should be submitted for the attention of Ms Silvia Bernal.

3.1 Timing for applications

Declarations / applications for new licences under both Sections 111(2) and (3) of the 1983 Act will be accepted from 27 October. Forms received between then and 5:00pm on 3 November will be considered for licence award on 1 December 1998 provided that the licence fee is included with the declaration / applications and that all information required by the Commission is complete. No application will be considered until the relevant licence application fee has been paid.

Processing of declarations / applications received after 3 November (or those which have been found to be incomplete) is unlikely to be completed until after 1 December. After this initial period, when special procedures apply, a Basic Telecommunications Licence declaration form will be processed and come into effect, unless rejected, within four week of the date at which the Commission is satisfied that it has received all the information that it needs. For a General Telecommunications Licence, the application will be processed within six weeks of date at which the Commission is satisfied that it has received all the information that it needs. For either licence, an applicant may be contacted anytime during the evaluation if additional information is required. However, the Commission will endeavour to ensure that such requests are made as early as possible after the application has been submitted.

3.2 The Application Process

In processing an application, the Commission will ensure that the application form is duly completed and administrative details are in order. It will also consider the information provided to ensure that it is appropriate to grant the licence.

A checklist to help applicants when submitting their applications is attached as Appendix A.

In evaluating a licence application, the Commission may consider a number of factors. For example, the availability of appropriate financial, managerial or technical resources may be taken into account when considering a General Telecommunications Licence. Inadequate resources or any such concerns in an area of this type may be sufficient reason to reject an application. However, in granting a licence the Commission is in no way endorsing the plans of an operator. Indeed, the Commission in no way makes or implies any comments on the operator’s plans. The licence cannot therefore be relied upon as an assessment of the likely commercial success or otherwise of its holder.

3.3 Separate Applications from Legal Entities

Licences are required by all separate legal entities. A licence issued to an individual may not be used for the benefit of any company of which the individual is a director. Such a company must have its own separate licence.

3.4 Basic Telecommunications Licence

The proposed declaration procedure for licences under Section 111(3) of the 1983 Act is as follows:

- i. Applicant must submit a declaration form (ref 98/45R) duly completed with appropriate licence fee. The Commission will confirm receipt of the licence fee and that it will hold this fee on behalf of the applicant pending consideration of the declaration.
- ii. An indication of the types of information which a licence applicant will be required to furnish to the Commission is set out in the application form and described in more detail in the following section 4 of these guidance notes.
The Commission may request further information from an applicant if in her opinion the form submitted has not been completed properly or for the purposes of confirming that the service concerned is of a type which is properly licensable under Section 111(3). Licence award may be delayed if it is necessary to request further information.
- iii. The conditions with which the licensee will be required to comply are attached to the form together with a declaration, which the licensee will be required to sign, confirming the accuracy of the information furnished and that it will at all times comply with the conditions set by the Commission as varied from time to time in accordance with relevant legislation.
- iv. The Commission will evaluate the application/declaration with a view to confirming that the service to which it applies is of a type which is licensable under Section 111(3) of the 1983 Act and that the form has been properly completed and the appropriate licence fee paid.
- v. If any form is submitted which is incomplete or which relates to a service of a type which is not licensable under the Basic Telecommunications Licence the Commission shall notify the applicant accordingly within 4 weeks of submission of the original completed form.
- vi. If the Commission is satisfied that the form submitted to it relates to a service which is properly licensable under Section 111(3) and has been completed in full it will acknowledge this in writing to the applicant and confirm that the person is licensed to provide the service outlined subject to the conditions applicable to that licence.
- vii. Provided the relevant licence fee has been paid, an applicant will be entitled to exercise the rights conferred by the relevant licence under Section 111(3) on the earliest of:
 - receipt of confirmation of the licence from the Commission;
 - if no written objection or request for further information is issued by the Commission in relation to the declaration within four weeks of its submission, on expiry of such four week period;
 - where the applicant has been notified that the form is incomplete or unsatisfactory to the Commission, on expiry of the four-week period commencing on the date on which all required information and satisfactory declaration are furnished to the Commission.
- viii. The Commission will publish the grant of the licence to an applicant and details of the name, address and telephone number of a designated contact in Ireland available to the public.

3.5 General Telecommunications Licence

It is proposed that applicants for licences under Section 111(2) of the 1983 Act be required to follow the procedure set out below:

- i. Applicant to submit an application form (reference 98/46R) duly completed together with the appropriate licence fee.
- ii. The application form sets out the types of information to be furnished to the Commission when applying for a licence under Section 111(2). It should be noted that, if in the Commission's reasonable opinion the information provided in a licence application is insufficient to support the application, further information may be sought and award of any licence to the applicant may be delayed.
- iii. The Commission will review applications received with a view to confirming that
 - the application is in due form and has been properly and fully completed;
 - the service / network is appropriate for licensing under the General Telecommunications Licence;
 - the applicant is not disqualified from holding the licence concerned;
 - the appropriate fee has been paid.
- iv. If the Commission is satisfied with regard to each of the above it will proceed to evaluate the application (see vii below).
- v. If the Commission considers that the application form has not been properly completed it shall so notify the applicant and request that the application form be resubmitted with the additional information required.
- vi. If the Commission considers that, having regard to the considerations referred to above it is not appropriate for a licence to be issued to the applicant, it shall notify the applicant of its proposal to refuse grant of the licence and shall follow the procedures set out in Section 111(10) of the 1983 Act.
- vii. In evaluating an application for a licence under Section 111(2), the Commission will consider the following to be grounds for rejection:
 - the proposed service is unlawful or inconsistent with international obligations and EU and national law;
 - the applicant does not have the necessary financial, managerial and technical resources to operate the proposed service;
 - the applicant will not comply with the appropriate terms and conditions;
 - any spectrum allocated will not be used efficiently and will interfere with other services / networks;
 - in the case of a telecommunications network, where it is designed in a manner that will not assure quality and availability of service;
 - the applicant or its senior officers has(have) been in serious breach of conditions included in other licences issued by the Commission.
- viii. The Commission will notify the applicant of its decision in relation to grant of a licence within six weeks of submission of the licence application or, if later, of any additional information requested by the Commission. Notice of the decision of the Commission to grant the licence will be made available to the public.
- ix. In the event that the Commission decides to refuse to grant a licence the procedures set out in Section 111(10) of the 1983 Act will be followed.
- x. Licence numbers will be allocated in sequence.

4. Information to be provided by the Licensee

The application forms ask for information. This section explains what is required and why.

The first thing an applicant will have to do is to decide whether a Basic Telecommunications Licence or General Telecommunications Licence is required (or indeed whether a licence is required at all). The appropriate application then needs to be completed. A fundamental concern of the Commission will be whether the services and networks are appropriate to the licence requested.

4.1 Confidentiality

The Commission will publish basic information about the applicant if a licence is awarded (see sections 3.3 and 3.4). Information from business plans (question 3.8 of application for a General Telecommunications Licence) will be kept confidential. Applicants may mark other information as confidential but the Commission reserves the right to discuss disclosure of this information with the applicant should the need arise.

4.2 Basic Telecommunications Licence

The Basic Telecommunications Licence application form requests a minimal amount of data as follows:

Table 4.1 Information required from Basic Telecommunications Licence Applicants

Question	Nature of information requested	Reason for information request
1 and 2	Business and trading details	Record keeping and contact data
3.1	Details of the services to be provided. Sufficient information should be provided to enable the Commission to ensure that the service is relevant to the licence being applied for. In particular the Commission needs to determine that the service will be a public telecommunications service (see section 2.1). If insufficient information is provided additional clarification may be sought by way, for example of network diagrams, marketing plans, etc.	The Commission needs to ensure the service needs a licence of the form requested.
3.2	Customer contracts. Details of standard terms and conditions in the form of pro forma contracts or other description of terms of business should be provided.	Licensees are obliged under Condition 5.1 to make available standard terms and conditions. Information is requested to ensure compliance with this condition.
3.3	The code of practice to be used by the applicant for the resolution of customer complaints should be included.	Licensees are obliged under Condition 5.9 to implement an appropriate code of practice. Information is requested to ensure compliance with this condition.
3.4	If an applicant intends to provide call box services, details of the service and how user information will be displayed should be provided	Condition 7 lays out a number of requirements for call box operators. Information is requested to ensure compliance with this condition.
3.5, 3.6	Details of any made or planned applications for numbers should be provided.	The Basic Telecommunications Licence does not allow applicants access to numbers for the allocation to users. This information is requested to ensure that the applicant does not need to operate under the General Telecommunications Licence.
4.1	If telecommunications infrastructure is provided or planned it should be described in this section. A high level description of the network architecture including a description of major transmission and switching components will be sufficient.	The Commission when regulating the market needs to understand the extent to which competitive infrastructures are developed. This question is intended to meet this need.
4.2, 4.3	Details of any infrastructure that will be developed using radio frequency spectrum should be described here	The Commission wishes to ensure consistency of approach between telecommunications licences and wireless telegraphy licences. The information provided here will be used for this purpose.

5.4	Details of existing licences and confirmation that they will be relinquished should be provided here	In section 2.5 of these guidance notes the Commission indicates its desire to avoid confusion as to which services are provided under which licence. This information is intended to ensure that the Commission's proposal to avoid this potential confusion is implemented.
5.5	Details of transition periods required and which conditions these apply to should be provided	The licence allows existing operators to seek a transition period of no more than three months for selected conditions

4.3 General Telecommunications Licence

The General Telecommunications Licence application form requests similar information to the Basic Telecommunications Licence application. This is supplemented by additional information resulting from the extra rights given to and obligations placed on such operators. A section of the application form is dedicated to organisations designated as having SMP status. This additional information again relates to the additional conditions that only apply to such operators. It should be noted that although companies designated as having SMP at a later date need not reapply for a licence, the Commission will require that any such company provides similar additional information in accordance with licence Condition 3.2.

The information required is as set out below.

Table 4.2 Information required from General Telecommunications Licence applicants

Question	Nature of information requested	Reason for information request
1 and 2	Business and trading details	Record keeping and contact data
3.1	Details of the services to be provided. Sufficient information should be provided to enable the Commission to ensure that the service is relevant to the licence being applied for. In particular the Commission needs to determine that the service will be a public telecommunications service (see section 2.1). If insufficient information is provided additional clarification may be sought by way, for example of network diagrams, marketing plans, etc.	The Commission needs to ensure the service needs a licence of the form requested.
3.2	Directory information. Applicants are asked to indicate how they would provide a directory information service. A statement that the service will be sub-contracted to an identified third-party is likely to be sufficient where the service is not provided in-house. Applicants will also be required to indicate how directory information from their own customers will be maintained and made available to any organisation providing a centralised database	Condition 6.10 of the General Telecommunications Licence sets out obligations in relation to directory information. Information is requested to ensure compliance with this condition.
3.3	Emergency services. Applicants should describe how any customer connected to a public telecommunications network can access the emergency services free of charge using the dialling code '112'. It is particular relevant for directly connected customers.	EC Directive 98/10/EC requires organisations to provide access to emergency services. Information is requested to ensure compliance with this condition.
3.4	If an applicant intends to provide call box services, details of the service and how user information will be displayed should be provided	Condition 8 lays out a number of requirements for call box operators. Information is requested to ensure compliance with this condition.
3.5	Quality of service. Operators should provide information relating to the quality of service standards that they intend to adopt. Particular attention should be given to standards set out in ETR 138.	Condition 12 indicates that the Commission intends to issue directions on quality of service. This information is required to ensure that the Commission understands what standards operators currently adopt so that the impact of future directions is understood.
3.6	Customer contracts. Details of standard terms and conditions in the form of pro forma contracts or other description of terms of business should be provided.	Licensees are obliged under Condition 6.1 to make available standard terms and conditions. Information is requested to ensure compliance with this condition.

3.7	The code of practice used by the applicant for the resolution of customer complaints should be included.	Licensees are obliged under Condition 6.9 to implement an appropriate code of practice. Information is requested to ensure compliance with this condition.
3.8	Business plans. A high-level business plan should be provided – key sources of finance, as well as revenue and expenditure projections should be provided. Revenue projections should be based on market forecasts. Detailed breakdown of expenditure is not required. This should cover as a minimum the first three years of operation. Where appropriate, credit rating may be indicated. Third-party confirmation of the business plan should be provided as appropriate. This information will be kept strictly confidential.	Inadequate financial resources will be considered by the Commission to be adequate reason to reject a licence application.
3.9	Managerial and technical resources. Brief resumes of key staff should be provided. Key sources of technology and technical expertise should be indicated.	Inadequate managerial or technical resources will be considered by the Commission to be adequate reason to reject a licence application.
3.10, 3.11	Details of any made or planned applications for numbers should be provided.	This information is requested to ensure that the applicant needs to operate under the General Telecommunications Licence rather than the Basic Telecommunications Licence.
4.1	If telecommunications infrastructure is provided or planned it should be described in this section. A high level description of the network architecture including a description of major transmission and switching components will be sufficient.	The Commission when regulating the market needs to understand the extent to which competitive infrastructures are developed. This question is intended to meet this need.
4.2, 4.3	Details of any infrastructure that will be developed using radio frequency spectrum should be described here.	The Commission wishes to ensure consistency of approach between telecommunications licences and wireless telegraphy licences. The information provided here will be used for this purpose.
5.4	Details of existing licences and confirmation that they will be relinquished should be provided here.	In section 2.5 of these guidance notes the Commission indicates its desire to avoid confusion as to which services are provided under which licence. This information is intended to ensure that the Commission's proposal to avoid this potential confusion is implemented.
5.5	Details of transition periods required and which conditions these apply to should be provided	The licence allows existing operators to seek a transition period of no more than three months for selected conditions
6.1	SMP operators should provide details of group structures.	SMP obligations will, where relevant, flow through a group structure. Details of affiliates are therefore needed.
6.2	SMP designated operators are required to provide a copy of their Reference Interconnect Offer (RIO).	The Interconnection Regulations require this. The RIO should be provided to ensure compliance
6.3	SMP designated operators should provide details of special wholesale terms.	EC Directive 98/10/EC requires this.
6.4	SMP operators should provide details of services they offer including the prices (including discount schemes) to be charged.	Licence Conditions 6.1 as modified by 14.1 is the reason for this request.
6.5	Details of an SMP operator's cost accounting systems should be provided in sufficient detail to allow the Commission to determine that interconnection charges are adequately unbundled.	Information is required to ensure compliance with licence Condition 16.
6.6	SMP operators should provide sufficient information to Commission to allow it to ensure cross-subsidy prohibition conditions	Information is required to ensure compliance with licence Condition 15.

	are met.	
6.7	SMP operators should provide details of its leased line products	Information is needed so that the Commission can ensure that the operator is meeting its obligation set out in licence Condition 18
7.1	Information should be provided on how an SMP operator intends to handle and resolve customer complaints include those for interconnecting parties. This information may be related back to information provided at question 3.7	An SMP operator may need to resolve a broader range of complaints.
7.2	Information should be provided to indicate how an SMP operator intends to publish conditions and prices in a transparent manner. Reference may be made to information provided in 6.3.	Licence Condition 6.1 as modified by 14.1 is the reason for this request.
7.3	SMP operators are required to implement a code of practice directed at its and its affiliates' employees and agents concerning selling practices. This code of practice should be provided.	This information is required to ensure compliance with licence Condition 20.

4.4 Licence Fee

Licence fees are related to the administrative costs of licensing. This has been calculated as follows:

Basic Telecommunications Licence	€2,500
General Telecommunications Licence	€12,500

Appendix 1 – Checklists

Basic Telecommunications Licence

Checklist

YES

- | | |
|---|--------------------------|
| 1. Is the licence fee included? | <input type="checkbox"/> |
| 2. Are Sections 1 & 2 completed as appropriate? | <input type="checkbox"/> |
| 3. Has the declaration been filled in correctly and by all appropriate persons? | <input type="checkbox"/> |
| 4. Have 3 copies of the application been included? | <input type="checkbox"/> |
| Enclosures | |
| 5. Details of each proposed service and proposed customer base | <input type="checkbox"/> |
| 6. Copies of current contracts with all classes of customers | <input type="checkbox"/> |
| 7. Details of the company’s Code of Practice for resolution of disputes | <input type="checkbox"/> |
| 8. Details of planned and actual public call box services, together with call charge information display details? | <input type="checkbox"/> |
| 9. Details of any number application made or planned | <input type="checkbox"/> |
| 10. Details of any telecommunications infrastructure in place or planned(if applicable) | <input type="checkbox"/> |
| 11. Summary of the applicant’s infrastructure / planned infrastructure | <input type="checkbox"/> |
| 12. If radio frequency spectrum is to be used, or the applicant has plans to use it, are licence or licence application details enclosed? | <input type="checkbox"/> |
| 13. All currently held VAS or infrastructure licences | <input type="checkbox"/> |

Please tick the “Yes” box where enclosures have been made; if the question is not relevant to your application, put “N/A” (not applicable) in the box.

General Telecommunications Licence
Checklist

	YES
1. Is the licence fee included?	<input type="checkbox"/>
2. Are Sections 1 & 2 completed as appropriate?	<input type="checkbox"/>
3. Has the declaration been filled in correctly, and by all appropriate persons?	<input type="checkbox"/>
4. Have 3 copies of the application been included?	<input type="checkbox"/>
 Enclosures	
5. Details of each proposed service and proposed customer base	<input type="checkbox"/>
6. Details of directory information services provision	<input type="checkbox"/>
7. Details of emergency services provision	<input type="checkbox"/>
8. Details of planned and actual public call box services, together with call charge information display details?	<input type="checkbox"/>
9. Details of the Quality of Service targets supported by the applicant	<input type="checkbox"/>
10. Copies of current contracts with all classes of customers	<input type="checkbox"/>
11. Details of the company's Code of Practice for resolution of disputes	<input type="checkbox"/>
12. A high level business plan	<input type="checkbox"/>
13. Resumes of key managerial staff	<input type="checkbox"/>
14. Details of any number application made or planned	<input type="checkbox"/>
15. Details of any telecommunications infrastructure in place or planned	<input type="checkbox"/>
16. Summary of the applicant's infrastructure / planned infrastructure	<input type="checkbox"/>
17. If radio frequency spectrum is to be used, or the applicant has plans to use it, are licence or licence application details enclosed?	<input type="checkbox"/>
18. All currently held VAS or infrastructure licences	<input type="checkbox"/>

Additional Enclosures for SMP operators

- 19. Applicant's Reference Interconnect Offer
- 20. Details of special wholesale terms to providers of services having no interconnecting networks
- 21. Details of products and services provided by the applicant and the terms and prices at which they are available
- 22. Details of the Cost Accounting System adopted by the applicant
- 23. Details of the applicant's other trading activities in all markets, with details of how cross-subsidisation between any of these activities is avoided
- 24. Details of current and proposed offerings of leased lines and the terms of the leases
- 25. Full details of measures adopted by the applicant to ensure fair resolution of complaints brought by customers, and operators who are also customers of the applicant
- 26. Details of the applicant's arrangements for the transparent publication of all terms and conditions, including charges for services
- 27. Details of Code of Practice adopted to ensure fair marketing practices, especially in the context of comparisons with service offerings of other service providers, linked sales and trial services

Please tick the "Yes" box where enclosures have been made; if the question is not relevant to your application, put "N/A" (not applicable) in the box.