



Commission for
Communications Regulation

Universal Service Obligation - Measures for disabled end-users; Terminal Equipment

Response to Consultation, Decision and Further Consultation

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Additional Information

All responses to this consultation should be clearly marked:

Submissions to ComReg 15/68

and should be sent by post, facsimile or e-mail to arrive on or before 1pm on 8 September 2015, to:

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Please note ComReg will publish all respondents' submissions with the Response to this Consultation, subject to the provisions of ComReg's guidelines on the treatment of confidential information – ComReg 05/24.

Legal Disclaimer

This consultation is not a binding legal document and also does not contain legal, commercial, financial, technical or other advice. The Commission for Communications Regulation is not bound by it, nor does it necessarily set out the Commission's final or definitive position on particular matters. To the extent that there might be any inconsistency between the contents of this document and the due exercise by it of its functions and powers, and the carrying out by it of its duties and the achievement of relevant objectives under law, such contents are without prejudice to the legal position of the Commission for Communications Regulation. Inappropriate reliance ought not therefore to be placed on the contents of this document.

Contents

Section	Page
1 Executive Summary	5
2 Background	7
3 Respondents views and ComReg’s Position	8
3.1 Requirement on Eircom to provide specific measures in relation disabled end-users - Terminal Equipment.....	8
3.2 Draft RIA	11
3.3. Draft Decision Instrument.....	12
Respondent’s views	12
ComReg’s Position.....	12
4 Regulatory Impact Assessment (“RIA”).....	13
4.1 Role of the RIA.....	13
4.2 Identify the policy issue and identify the objectives;	14
4.3 Identify and describe the regulatory options;.....	14
4.4 Determine the impacts on stakeholders;	15
4.5 Determine the impacts on competition;	15
4.6 Assess the impacts and choose the best option	16
5 Further consultation issue	17
6 Submitting Comments	18
7 Decision Instrument.....	19
Annex 1 Legal Basis.....	21
Annex 2 Specialised Terminal Equipment for Disabled End-Users	22

1 Executive Summary

- 1 The Commission for Communications Regulation (ComReg), previously designated Eircom as the Universal Service Provider (USP), responsible for providing the Universal Service Obligations (USO) regarding the specific measures for disabled end-users, in accordance with Regulation 6 of the Universal Service Regulations (USR).¹
- 2 In accordance with Regulation 6 and 7 and ComReg D09/14², Eircom is currently the only undertaking obliged to provide terminal equipment to meet needs of specified disabled end-users as follows:-
 - For users who are hearing-impaired
 - For users with limited dexterity or mobility
 - For users with restricted vision
- 3 ComReg issued a consultation ComReg 15/52, Universal Service Obligation – Measures for disabled end-users - Terminal Equipment, on 12th June 2015, in which it proposed that Eircom, in accordance with Regulation 6 and 7 of the USR, should continue to be designated, at this time, to provide the terminal equipment necessary to meet these obligations for a further six months, until the end December 2015.
- 4 Regulation 6 of the Regulations provides that ComReg shall, with the consent of the Minister³, specify obligations applicable to designated undertakings for the purpose of ensuring that disabled end-users can enjoy access to and affordability of certain services.
- 5 ComReg invited all stakeholders to respond to consultation 15/52. Responses were received from;
 - DeafHear
 - eircom Group (Eircom)
- 6 ComReg has considered both DeafHear's and Eircom's views and is now issuing this response to ComReg 15/52 and Decision and a further consultation regarding the period post 31st December 2015, for all stakeholders to submit their final views on this matter.

¹ S.I. No. 337/2011 - European Communities (Electronic Communications Networks and Services) (Universal Service and Users' Rights) Regulations 2011, 6. Measures for disabled end-users

² ComReg14/70 - Universal Service Obligation – Measures for Disabled End-Users – July 2014 s

³ Minister for Communications, Energy and Natural Resources

- 7 Having received the Minister's consent, ComReg's Decision is to designate Eircom, in accordance with Regulation 6, 7 and 8 of the USR, to continue to provide the terminal equipment necessary to meet the requirements, until 31st December 2015.

2 Background

- 8 ComReg's Forum on Electronic Communications Services for People with Disabilities ("The Forum") was established in 2006 to further ComReg's statutory objectives to promote competition and to promote the interests of users. To date the Forum has worked in a collaborative manner to progress and implement measures both on a voluntary basis and in accordance with Regulation 17 of the USR. The functions of the Forum and key achievements to date are listed in Annex 2 of consultation document ComReg 15/52.
- 9 As set out in the consultation document ComReg 15/52 preliminary discussions were held at the Forum in respect of specific measures for disabled end-users provided by Eircom as the USP, including terminal equipment and its take-up.
- 10 During the meeting there was an initial discussion regarding the continued need for Eircom to supply specialised terminal equipment for fixed voice services however, no preliminary view was formed. It was noted that the required terminal equipment (handsets) are sold to consumers and therefore they are offered commercially by Eircom. Also Eircom stated that it would likely continue to sell accessible phones, absent a designation to meet consumers' needs. Details of take-up were also presented by Eircom and this presentation was subsequently published by ComReg⁴.
- 11 On 5th March 2015 ComReg published further information on usage and take-up of measures for disabled end-users including specialised terminal equipment⁵.

⁴ <http://www.comreg.ie/fileupload/publications/ComReg1454a.pdf>

⁵ <http://www.comreg.ie/fileupload/publications/ComReg1522.pdf>

3 Respondents views and ComReg's Position

- 12 In its response to ComReg 15/52, Eircom made comments in relation to concerns it has regarding consultation ComReg 15/52 including relating to the issue date⁶, the short consultation period and the period for ComReg to consider responses.
- 13 ComReg acknowledges that there was a short consultation period for consultation document ComReg 15/52, however, ComReg notes, as noted in the consultation, that the matter had already been discussed at the Forum previously, and Eircom also acknowledges this. In this respect, the matters were under consideration for some time. In addition, ComReg notes that no extension requests were received for ComReg 15/52.
- 14 ComReg also notes that should ComReg have required further time to consider responses, it had options available to facilitate this.
- 15 ComReg also notes that the process is in accordance with the process set out in ComReg 11/34⁷.
- 16 Having considered Eircom's response and additional arguments it has raised in support of its assertion that the obligation regarding terminal equipment is not necessary, together with DeafHear's arguments to the contrary, ComReg is now allowing for further consultation with stakeholders, regarding the period after December 2015, over the next two months. During this period, ComReg also plans to publish the usage and take-up statistics for the period 1 January 2015 to 30 June 2015. The further consultation issue is set out in Section 5.

3.1 Requirement on Eircom to provide specific measures in relation disabled end-users - Terminal Equipment⁸

- 17 ComReg's preliminary view, as set out in ComReg 15/52, was that Eircom should continue, pursuant to Regulation 6 and 7 of the Regulations, to continue to provide the specific measures detailed at Annex 2 for disabled end-users from 1 July 2015 to 31 December 2015.
- 18 ComReg's consultation asked the following two questions in relation to the measures being proposed:

⁶ The issue date on ComReg's website was 12th June 2015, as dated on the 1st page of the document not 11th June as referred to in paragraph 45 of the consultation.

⁷ ComReg 11/34 ComReg Consultation procedures.
http://www.comreg.ie/fileupload/publications/ComReg_1134.pdf

⁸ See Annex 2

- *Do you agree that Eircom should be required, pursuant to Regulation 6 and 7 of the Regulations, to continue to provide the specific measures detailed in paragraph 13 for disabled end-users from 1 July 2015 to 31 December 2015? Please provide detailed reasons and supporting evidence for your view.*
- *Do you have further information on reasons as to why Eircom or another USP should be obliged to continue to provide specific terminal equipment post 31 December 2015? Please provide detailed reasons and supporting evidence for your view.*

Respondent's views

- 19 DeafHear agrees *“that it is appropriate to continue to require Eircom to provide specialised terminal equipment. We do not believe that it is the case that phones available from service providers are generally accessible to people with hearing loss. While most phones available may have an inductive coupler, few have a visual alert facility, and although many have a volume control facility, this does not mean that the volume and quality of the sound provided will be sufficient to meet the needs of a person with hearing loss. The sale by Eircom of over 4,000 units of the Big Tel and 9000B phones in 2014 bear this out.”*
- 20 DeafHear also *“believes that all undertakings, not just Eircom, should be obliged to provide a certain number of phone products that are suitable for use by Deaf and Hard of Hearing people. This would be consistent with the principle of equivalence in providing access to accessible terminal equipment, and providing access in terms of choice and price.”*
- 21 DeafHear notes that Eircom’s online purchase facility for such equipment is no longer available.
- 22 Eircom does not agree that ComReg should *“re-designate eircom as Universal Service Provider (USP) in respect of providing terminal equipment to meet the specified needs of disabled end users for a period of 6 months to 31 December 2015.”*
- 23 Eircom further notes that; *“Stakeholder discussions on the subject matter of this consultation have been on-going for over a year and a half. It is also notable that there were only two respondents to the previous consultation in 2014; eircom and NCBI. NCBI made no reference to the matter of specialised terminal equipment⁸. It seems to eircom that there has been ample opportunity to provide justification for the perpetuation of this USO, however all the evidence presented to date points to a lack of justification and hence ComReg should come to a clear conclusion now that the USO designation should not be continued”.*

- 24 Eircom also states; *“Eircom should not be obliged now or in the future to continue to provide specific terminal equipment. There is no market failure that needs to be addressed as highlighted in our response to question”*

ComReg’s views

- 25 ComReg notes that DeafHear is in agreement that it is appropriate to continue to require Eircom to provide specialised terminal equipment and its proposal that the obligation to be further extended to all undertakings.
- 26 ComReg notes Eircom’s views on the perceived lack of evidence for the requirement to oblige Eircom pursuant to Regulation 6 and 7 of the Regulations, to continue to provide the specific Terminal Equipment for disabled end-users.
- 27 However, ComReg also notes that there are some consumers still purchasing this equipment from Eircom and ComReg remains concerned that in the short term there may be detriment for some disabled consumers absent the obligation, and without adequate information to consumers of alternative purchasing options.
- 28 ComReg is aware that there are retail channels (including online) that are supplying specialised terminal equipment. However, whilst being mindful that those retail stores and online points of sale are outside of ComReg’s remit, it intends to monitor the availability of such products in the market over the coming months and will be informed (including by the Forum) of any evidence and customer experiences and issues with the purchase of terminal equipment. ComReg is also cognisant of its role in respect of universal service and its current mandate to ensure that the necessary facilities are provided.
- 29 ComReg’s preliminary view is that the designation should not be continued after December 2015 and that instead ComReg should monitor the availability of suitable equipment and stand ready to re-impose an obligation if necessary. However it considers that stakeholders should have a further opportunity to comment on this before a decision is taken.
- 30 ComReg considers that all stakeholders may wish to provide further views on the detail provided by both DeafHear and Eircom in their responses, in relation to the period post December 2015.

ComReg’s position

- 31 ComReg has decided, in light of the continued, albeit low, take-up of this equipment and in light of ComReg’s objectives, that it is appropriate to designate Eircom for a further six months until 31 December 2015.

- 32 However, ComReg is of the view that there should be a further consultation on ComReg's preliminary view that the obligation should no longer be mandated post 31 December 2015. This is addressed in section 5.

3.2 Draft RIA

Respondent's views

- 33 DeafHear agrees with ComReg *“that it should seek more insights in respect of ongoing monitoring of the provision of specialised terminal equipment. This should include examining the impact of the change in Eircom's practice whereby such equipment can no longer be purchased online; the opportunity to test terminal equipment and the provision of information making customers aware of this facility. With regard to the withdrawal of online purchasing of terminal equipment by Eircom, it is somewhat perverse that a customer who requires a specialised phone in order to make phone calls, now is faced with the alternative of purchasing the phone that they need by making a call to 1901”*
- 34 Eircom stated that *“it that has reviewed the draft Regulatory Impact assessment (RIA). Based on the information presented in the RIA ComReg has reached a conclusion that is inconsistent with the facts. At paragraph 42 ComReg confirms that its “research indicated the handsets that Eircom are required to provide are widely available from multiple retail stores and online.”*

ComReg's Position

- 35 ComReg notes that the option of purchasing the equipment from Eircom online has been withdrawn, however, ComReg also notes that there are a number of other websites that offer an online service for specialised terminal equipment as an alternative to Eircom.
- 36 In light of the above, and in light of the continued monitoring by ComReg, of the available options through which consumers can access the required specialised terminal equipment and the necessity for this obligation, ComReg is of the view that it is most appropriate that Eircom continues to be designated to meet the obligations for at least the six months at this time.
- 37 However, ComReg's preliminary view is that the obligation should not be extended post 31 December 2015 in the absence of sufficient evidence as to the necessity of the requirement. Therefore, ComReg seeks stakeholder's final views on this matter and it expects that the disability representative groups participating in ComReg's Forum will put forward specific issues experienced by disabled end-users in respect of purchasing terminal equipment, as relevant. The further consultation is addressed in section 5.

3.3. Draft Decision Instrument

38 ComReg requested any comments on the substance or the drafting of the draft Decision Instrument.

Respondent's views

39 Eircom advised; *“Without prejudice to eircom’s position that a further designation on eircom is not justified. Eircom has reviewed the text of the draft Decision Instrument. Eircom takes exception to Section 4 of the draft Decision Instrument. Section 4 seeks to preserve the USO regime that was in place prior to the proposed decision. However D09/14 is a time bound Decision which will expire on 30 June 2015. As such Section 4 should be deleted as it is not lawful”*

40 ~~“4. CONTINUATION OF OBLIGATIONS~~

41 ~~All other obligations imposed on the USP by ComReg in relation to its universal service obligations, which were immediately in force prior to the effective date of this Decision and Decision Instrument, shall continue to have full force and effect.”~~

ComReg's Position

42 At this section of the Draft Decision Instrument, it clearly relates to “all other obligations imposed on the USP by ComReg in relation to its Universal Service obligations”, i.e. not to D09/14. The purpose of this section, which is standard practice in all USO Decisions, is to make it clear that all other extant USO obligations are not affected by this particular Decision. Therefore, ComReg does not see any requirement to delete section 4 further to this point. However, to deal with Eircom’s concerns, ComReg has inserted an explicit reference to D09/14 in the Decision Instrument, to make it clear that that Decision Instrument is no longer extant.

4 Regulatory Impact Assessment (“RIA”)

4.1 Role of the RIA

- 43 A RIA is an analysis of the likely effect of a proposed new regulation or regulatory change. The RIA should help identify regulatory options, and should establish whether or not a proposed regulation is likely to have the desired impact. The RIA should also in certain cases suggest whether regulation is or is not appropriate. The RIA is a structured approach to the development of policy, and analyses the impact of regulatory options on different stakeholders.
- 44 ComReg’s approach to RIA is set out in the Guidelines published in August 2007, Commission Document No. 07/56 & 07/56a. In conducting this RIA, the Commission takes account of the RIA Guidelines,⁹ adopted under the Government’s *Better Regulation* programme.
- 45 Section 13 (1) of the Communications Regulation Act 2002, as amended, requires ComReg to comply with certain Ministerial Policy Directions. Policy Direction 6 of February 2003 requires that before deciding to impose regulatory obligations on undertakings ComReg must conduct a RIA in accordance with European and International best practice, and otherwise in accordance with measures that may be adopted under the Government’s *Better Regulation* programme. In conducting the RIA, ComReg also has regard to the fact that regulation by way of issuing decisions e.g. imposing obligations or specifying requirements can be quite different to regulation that arises by the enactment of primary or secondary legislation.
- 46 In conducting RIA, ComReg takes into account the six principles of *Better Regulation*. These are:
1. Necessity.
 2. Effectiveness.
 3. Proportionality.
 4. Transparency.
 5. Accountability.
 6. Consistency.

⁹ See: http://www.taoiseach.gov.ie/eng/Publications/Publications_2011/Revised_RIA_Guidelines_June_2009.pdf

- 47 To ensure that a RIA is proportionate and not overly burdensome, a common sense approach is taken. As decisions are likely to vary in terms of their impact, and if after initial investigation a decision appears to have relatively low impact, ComReg would expect to carry out a less exhaustive RIA. In determining the impacts of the various regulatory options, current best practice appears to recognise that full cost benefit analysis would only arise where it would be proportionate, or, in exceptional cases, where robust, detailed, and independently verifiable data is available. This approach will be adopted when necessary.
- 48 ComReg's RIA Guidelines set out, amongst other things, the circumstances in which ComReg considers that a RIA might be appropriate. In summary, ComReg will generally conduct a RIA in any process that might result in the imposition of a regulatory obligation (or the amendment of an existing regulatory obligation to a significant degree), or which might otherwise significantly impact on any relevant market or on any stakeholders or consumers.
- 49 As set out in ComReg's RIA Guidelines, there are five steps to this RIA. These steps are:
- 50 Step 1: Identify the policy issue and identify the objectives;
- 51 Step 2: Identify and describe the regulatory options;
- 52 Step 3: Determine the impacts on stakeholders;
- 53 Step 4: Determine the impacts on competition; and
- 54 Step 5: Assess the impacts and choose the best option.

4.2 Identify the policy issue and identify the objectives;

- 55 The measures specified in respect of disabled end-users to be delivered by the USP, Eircom, contained in D09/14, expire at the end of June 2015.
- 56 These measures include the provision of specialised terminal equipment by Eircom.
- 57 ComReg is monitoring the necessity for this obligation, but is concerned that if the obligation were removed, in the short term, there may be detriment to disabled end-users who wish to purchase specialised terminal equipment.

4.3 Identify and describe the regulatory options;

- 58 There were three options considered by ComReg at this time.

- 59 Option 1: Not to require any undertaking to supply specialised terminal equipment for disabled end-users.
- 60 Option 2: To require Eircom, pursuant to Regulations 6 and 7 of the Regulations to provide specialised terminal equipment for disabled end-users for a substantive period.
- 61 Option 3: To require Eircom, pursuant to Regulations 6 and 7 of the Regulations to provide specialised terminal equipment for disabled end-users for a short period, at this time.

4.4 Determine the impacts on stakeholders;

- 62 Option 1: Should ComReg not require any undertaking to provide specialised terminal equipment, there is a danger that disabled end-users may not be able to source equipment to meet their needs.
- 63 Option 2: Should ComReg require Eircom to provide specialised terminal equipment for a substantive period there is a danger that disabled end-users' needs may change and/or the obligation becomes unnecessary.
- 64 Option 3: Should ComReg require Eircom to provide specialised terminal equipment for a short period it allows for any insights in respect of ComReg's ongoing monitoring to be evaluated and incorporated in any further decision on this aspect.
- 65 For Eircom, any cost of providing the terminal equipment is recouped in the price of the handsets sold to consumers. Additionally, ComReg's research indicated the handsets that Eircom are required to provide are widely available from retail stores and online retail sites. However, DeafHear is of the view that disabled end-users may not be aware of alternatives and DeafHear agrees with ComReg that it should seek more insights in respect of ongoing monitoring of the provision of specialised terminal equipment. ComReg also notes that all handsets are obliged to comply with EN standards.

4.5 Determine the impacts on competition;

- 66 ComReg is of the view that continuing the obligation on Eircom to provide specialised terminal equipment would have no negative impact on competition.

4.6 Assess the impacts and choose the best option

67 In light of the above, and in light of the continued monitoring by ComReg of the necessity for this obligation, ComReg is of the view that it is most appropriate that Eircom continues to be designated to meet the obligations for six months at this time (Option 3).

5 Further consultation issue

- 68 ComReg is considering whether any universal service obligation to provide specialised terminal equipment may be necessary post 31st December 2015.
- 69 In light of the discussions at the Forum, the usage statistics and information published to date and the responses to previous consultations on the matter, ComReg's preliminary view is that the obligation is no longer required to be mandated post 31 December 2015 and ComReg seeks stakeholder's views on this preliminary view.
- 70 ComReg is asking stakeholder's for any final views in respect of the obligation to provide terminal equipment post December 2015.
- 71 During the consultation period ComReg will continue to monitor the sales channels available and used by end-users to purchase necessary specialised terminal equipment.

Q. 1 Do you agree with ComReg's preliminary view that the obligation, to continue to provide specialised terminal equipment should not be extended post 31 December 2015? Please provide detailed reasons and supporting evidence for your view.

6 Submitting Comments

- 72 The consultation period will run 8 July 2015 to 1pm on 8 September 2015.
- 73 Responses must be submitted in written form. If responses are submitted electronically, they must also be unprotected so as to facilitate online publication.
- 74 It is sometimes necessary for respondents to provide confidential information in their submissions. Confidential information must be clearly identified as such. ComReg will publish all of the responses it receives to this consultation, subject to its guidelines on the treatment of confidential information.¹⁰
- 75 We would request that electronic submissions be submitted in an unprotected format so that they can be appended into the ComReg submissions document for publishing electronically.
- 76 ComReg appreciates that many of the issues raised in this paper may require respondents to provide confidential information if their comments are to be meaningful.
- 77 As it is ComReg's policy to make all responses available on its web-site and for inspection generally, respondents to consultations are requested to clearly identify confidential material and place confidential material in a separate annex to their response.
- 78 Such material will be subject to the provisions of ComReg's guidelines on the treatment of confidential information.¹¹

¹⁰ ComReg 05/24

¹¹ ComReg 05/24

7 Decision Instrument

1. STATUTORY FUNCTIONS AND POWERS GIVING RISE TO DECISION

1.1 This Decision and Decision Instrument, made by the Commission for Communications Regulation (“ComReg”), relates to the provision of universal services in the Irish telephony market and is made:

- i. Having regard to sections 10 and 12 of the Communications Regulation Act 2002;
- ii. Pursuant to the functions and powers conferred upon ComReg under and by virtue of Regulation 7(1) of the European Communities (Electronic Communications Networks and Services) (Universal Service and Users’ Rights) Regulations 2011 (“the Regulations”);
- iii. Having regard to Regulations 6 and 8 of the Regulations;
- iv. Having taken account ComReg Decision document No. 14/52 (D04/14);
- v. Having taken account of the representations of interested parties submitted in response to ComReg document No. 14/54 and
- vi. Having regard to the following analysis and reasoning set out in ComReg document No. 15/68.

2. DESIGNATION OF UNIVERSAL SERVICE PROVIDER

Specific Measures for Disabled Users

2.1 In accordance with Regulation 7 of the Regulations, Eircom Limited and its subsidiaries, and any undertaking which it owns or controls and undertaking which owns or controls it and its successors and assigns (“Eircom”) is hereby designated as the USP for the purpose of complying with the following obligations, as provided for by Regulation 6 of the Regulations, the USP shall therefore provide the following specific services:

(a) **For users with limited dexterity or mobility:**

- (i) Push button telephone sets with speed and automatic redial buttons allowing pre-programmed telephone numbers (typically the most called numbers) or last called telephone numbers to be dialled without having to re-enter the telephone number.

(ii) Hands free/loudspeaker phones means that the handset does not need to be used at all.

(b) For users who are hearing-impaired:

(i) Inductive couplers which allow users with a hearing aid set to connect the set to their telephone in order to allow them to hear incoming speech clearly.

(ii) Amplifier phones which allow the user to increase the volume of incoming speech.

(iii) Teleflash Visual Alert which shows a flashing light, or makes a loud noise when the telephone rings.

(d) For users with restricted vision:

(i) Restricted vision telephones which can help people with restricted vision to find other numbers more easily.

3. GEOGRAPHICALLY AVERAGED PRICING

As provided for by Regulation 8 (3) of the Regulations, Eircom, as the USP, shall apply geographically averaged prices throughout the State for the services referred to in this Decision.

4. CONTINUATION OF OBLIGATIONS

All other obligations imposed on the USP by ComReg in relation to its universal service obligations (other than Decision D09/14), which were immediately in force prior to the effective date of this Decision and Decision Instrument, shall continue to have full force and effect.

5. EFFECTIVE DATE AND DURATION

This Decision and Decision Instrument is effective from 8 July 2015 until 31 December 2015.

Jeremy Godfrey
CHAIRPERSON
THE COMMISSION FOR COMMUNICATIONS REGULATION
THE 8 DAY OF JULY 2015

Annex 1 Legal Basis

Universal Service Requirements

- A 1.1 Current US obligations in relation to terminal equipment are set out in Decision D09/14¹², which applies from 7 July 2014 until 30 June 2015.
- A 1.2 Regulation 7 of the Regulations, provides that ComReg may designate an undertaking, for such period as may be specified, to comply with a universal service obligation.
- A 1.3 Regulation 6 of the Regulations, provides that ComReg shall, with the consent of the Minister, specify obligations applicable to designated undertakings for the purpose of ensuring that disabled end-users can enjoy access to and affordability of certain services.
- A 1.4 Regulation 8 of the Regulations provides that ComReg may, with the consent of the Minister, require an undertaking designated under Regulation 7 to apply common tariffs including geographical averaging throughout the State.

¹² Contained in ComReg document 14/70 “Universal Service Obligation – Measures for Disabled End-Users – Response to Consultation and Decision”.

Annex 2 Specialised Terminal Equipment for Disabled End-Users

79 D09/14 designated to provide the following specialised terminal equipment, so that disabled end-users can enjoy access to and affordability of other universal services:

- **For users who are hearing-impaired**
- Inductive couplers which allow users with a hearing aid set to connect the set to their telephone in order to allow them to hear incoming speech clearly.
- Amplifier phones which allow the user to increase the volume of incoming speech.
- Teleflash Visual Alert which shows a flashing light, or makes a loud noise when the telephone rings.
- **For users with limited dexterity or mobility**
- Push button telephone sets with speed and automatic redial buttons allowing pre-programmed telephone numbers (typically the most called numbers) or last called telephone numbers to be dialled without having to re-enter the telephone number.
- Hands free/loudspeaker phones means that the handset does not need to be used at all.
- **For users with restricted vision**
- Restricted vision telephones which can help people with restricted vision to find other numbers more easily.