



An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

# ComReg Consumer Line Statistics Report

Q1 2021 – 1 January to 31 March 2021

## Information Notice

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**An Coimisiún um Rialáil Cumarsáide**  
**Commission for Communications Regulation**

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# 1: Executive Summary

ComReg's Consumer Care team manage consumer contacts in relation to Electronic Communications Services (ECS), Premium Rate Services (PRS) and postal services. This publication includes information on issues raised by service providers' customers and recorded by ComReg in Q1 2021<sup>1</sup>.

In Q1 2021, ComReg's Consumer Care team recorded approximately 18,400 contacts and 6,498 issues. In Q4 2020, 7,992 issues were recorded, and approximately 21,600 consumer contacts were received. ComReg's Consumer Care team managed approximately 6,100 Service Provider contacts during Q1 2021, compared to 6,500 in Q4 2020. 79% of all issues recorded were queries and 21% of all issues were complaints. 81% of all issues recorded relate to ECS, 8% relate to PRS, and 11% relate to 'Not for ComReg'/Other. There was a 35% decrease in the total number of issues recorded compared to Q1 2020; ECS issues increased by 2%, and PRS issues decreased by 86%.

In Q1 2021, ComReg's Consumer Care team recorded 534 Mobile Service Provider issues for Eir. 394 issues were recorded for 3. 394 issues were recorded for Vodafone. The median resolution time for Mobile Service Provider complaints was 9.0 working days, the same as in Q4 2020. The average number of complaints per 100,000 subscribers was 5.1, compared to an average of 7.1 complaints per 100,000 subscribers in Q4 2020.

In Q1 2021, ComReg's Consumer Care team recorded 1,525 Fixed Service Provider issues for Eir. 133 issues were recorded for Imagine. 380 issues were recorded for Sky Ireland Limited. 222 issues were recorded for Virgin Media. 826 issues were recorded for Vodafone. The median resolution time for Fixed Service Provider complaints was 10.0 working days, compared to 8.0 working days in Q4 2020. The average number of complaints per 100,000 subscribers was 68.9, compared to an average of 86.9 complaints per 100,000 subscribers in Q4 2020.

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<sup>1</sup> The basis for inclusion is where the total number of ECS and PRS issues recorded in the relevant quarter is in excess of 100 and 40, respectively.

## 2: Consumer Contacts

In Q1 2021, approximately 18,400 consumer contacts were received by ComReg’s Consumer Line. ComReg’s Consumer Line is available from Monday to Friday 8.00am to 8.00pm and Saturday 9.00am to 1.00pm. Figure 1 below shows the split of these contacts by channel<sup>2</sup> over the last four quarters. In Q1 2021, phone and e-mail/online form continued to be the most popular methods of contact. ComReg’s Consumer Line received approximately 6,100 service provider contacts in Q1 2021.

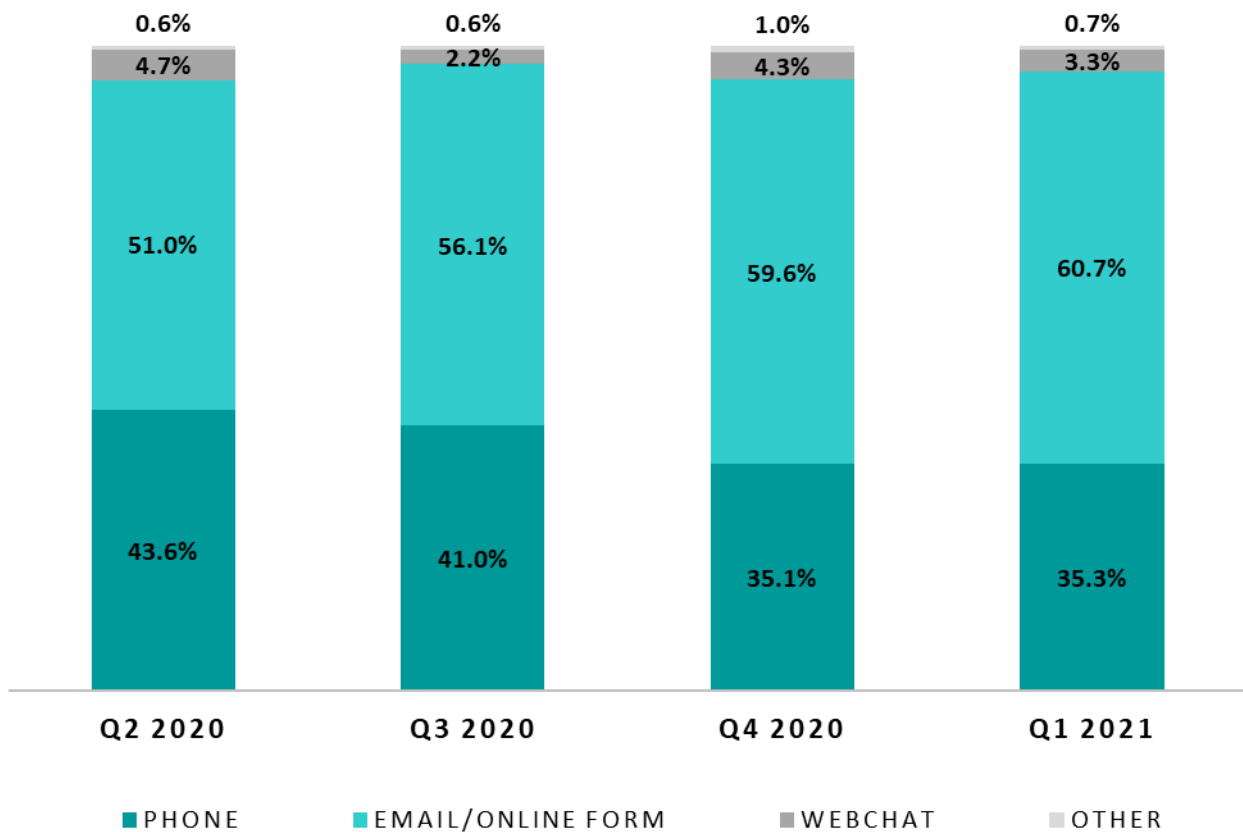


Figure 1: Split of contacts to ComReg’s Consumer Line by channel Q2 2020 – Q1 2021

<sup>2</sup> The contact channel ‘Other’ includes contacts received by letter and SMS. For further details on ComReg’s Consumer Line contact channels, see Annex 1.

# 3: Consumer Issues Recorded

## 3.1 All Issues Recorded

In Q1 2021, ComReg recorded 6,498 issues which are classified across three main categories: ECS, PRS and ‘Not for ComReg/Other’. There was a 35% decrease in the total number of issues recorded compared to Q1 2020; ECS issues increased by 2%, and PRS issues decreased by 86%. Figure 2 shows the trend in number of issues recorded over the last five quarters, which allows for a seasonal comparison of issues recorded in Q1 2020 to Q1 2021.

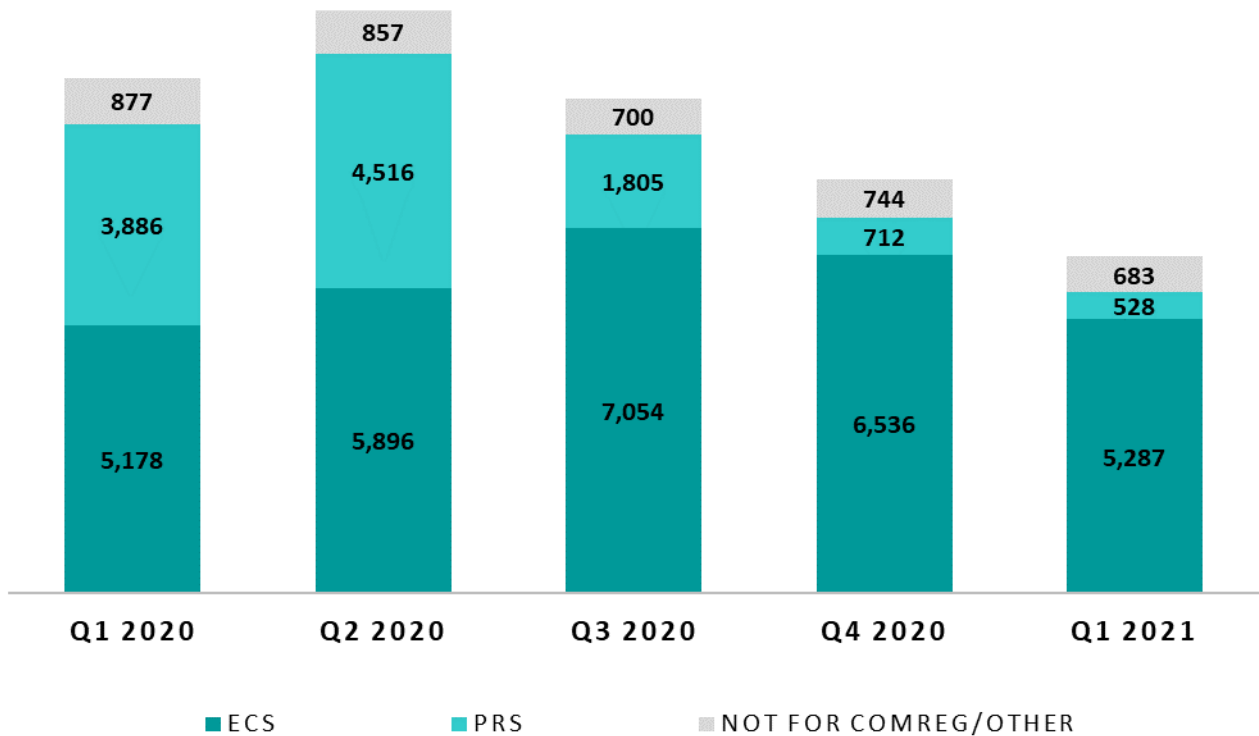


Figure 2: Number of issues recorded Q1 2020 – Q1 2021 by category

In Q1 2021, 81% of all issues recorded were in relation to ECS, while PRS issues and 'Not for ComReg/Other' issues accounted for 8% and 11% of all other issues, respectively. Figure 3 below shows the split of these three category types.

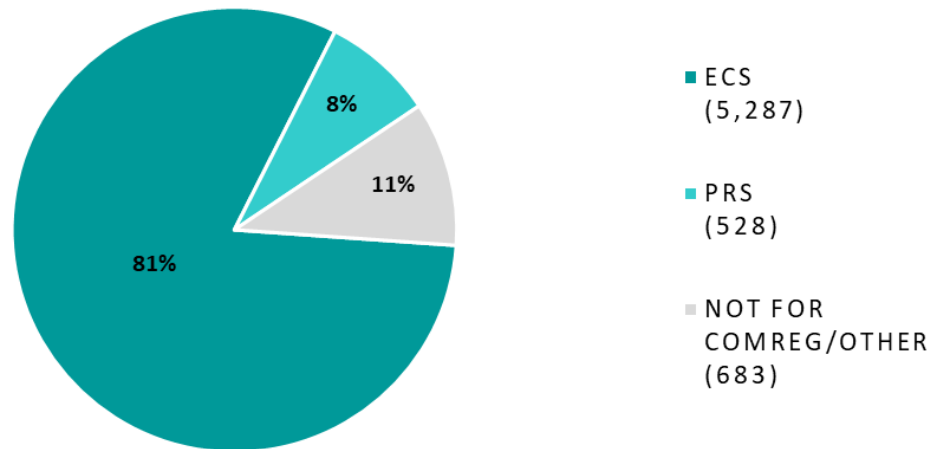


Figure 3: Split of all issues recorded in Q1 2021 by category

### 3.2 All Issues Recorded by Classification Type<sup>3</sup>

In Q1 2021, a total of 6,498 issues were recorded by ComReg’s Consumer Line. The categories ECS and PRS are further split by classification type, which indicate the nature of the issue, such as an ECS Billing Issue. Figure 4 below shows the number of issues recorded for each classification type, comparing Q4 2020 to Q1 2021.

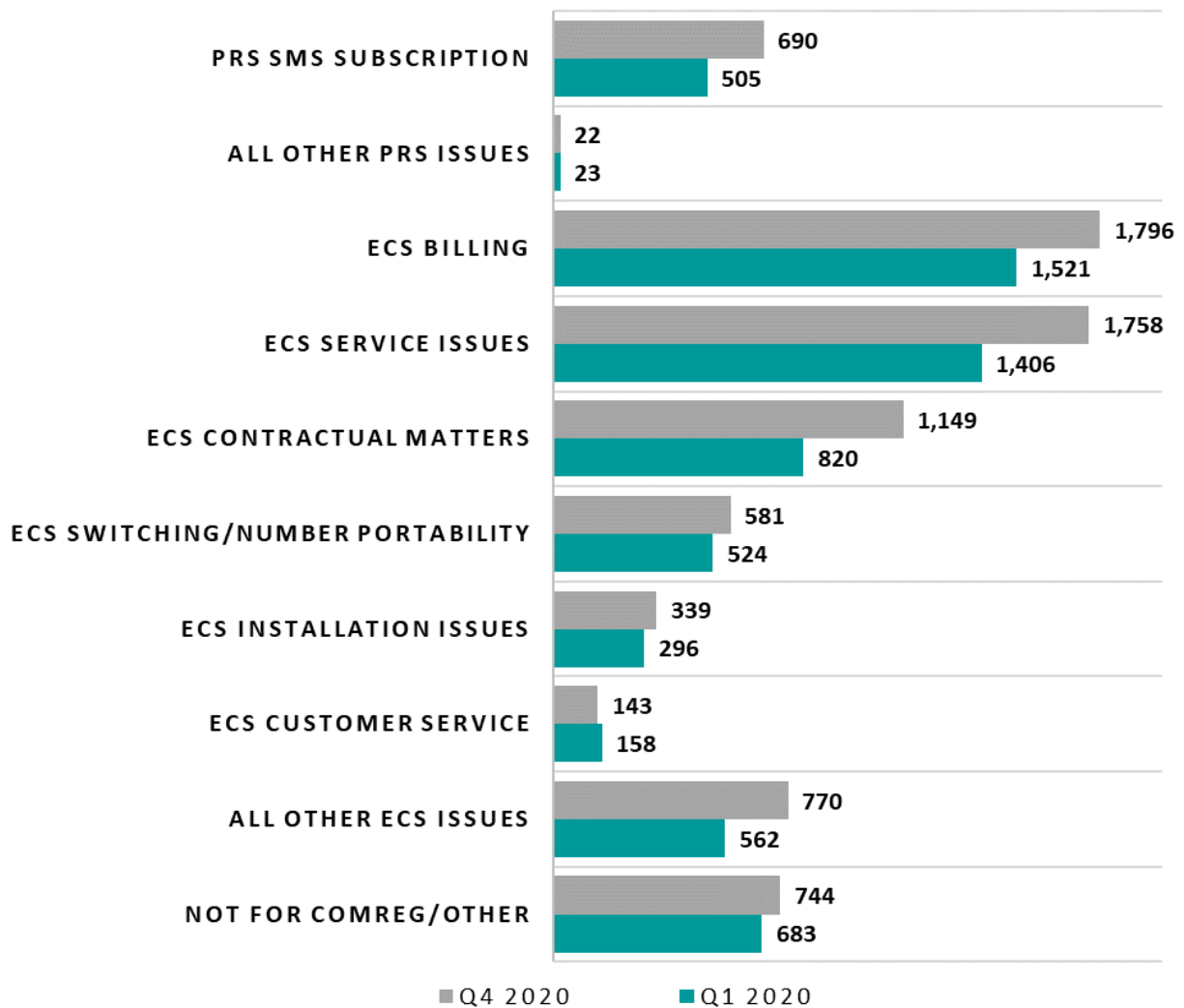


Figure 4: Number of issues recorded by classification type Q4 2020 vs Q1 2021

<sup>3</sup> See Annex 3 for Classification Type Index and Annex 2 for Mobile Coverage Service Issue details.

### 3.3 All Issues Recorded by Queries vs Complaints

ComReg’s Consumer Line records two types of issues: queries or complaints. In Q1 2021, 79% of all issues recorded were queries, and 21% were complaints. Of the 5,143 queries recorded in Q1 2021, 78% were in relation to ECS and 9% were in relation to PRS. Of the 1,355 complaints recorded, 94% were in relation to ECS and 6% were in relation to PRS. For further detail on the highest volume ECS issues recorded, see Figure 10 and Figure 21.

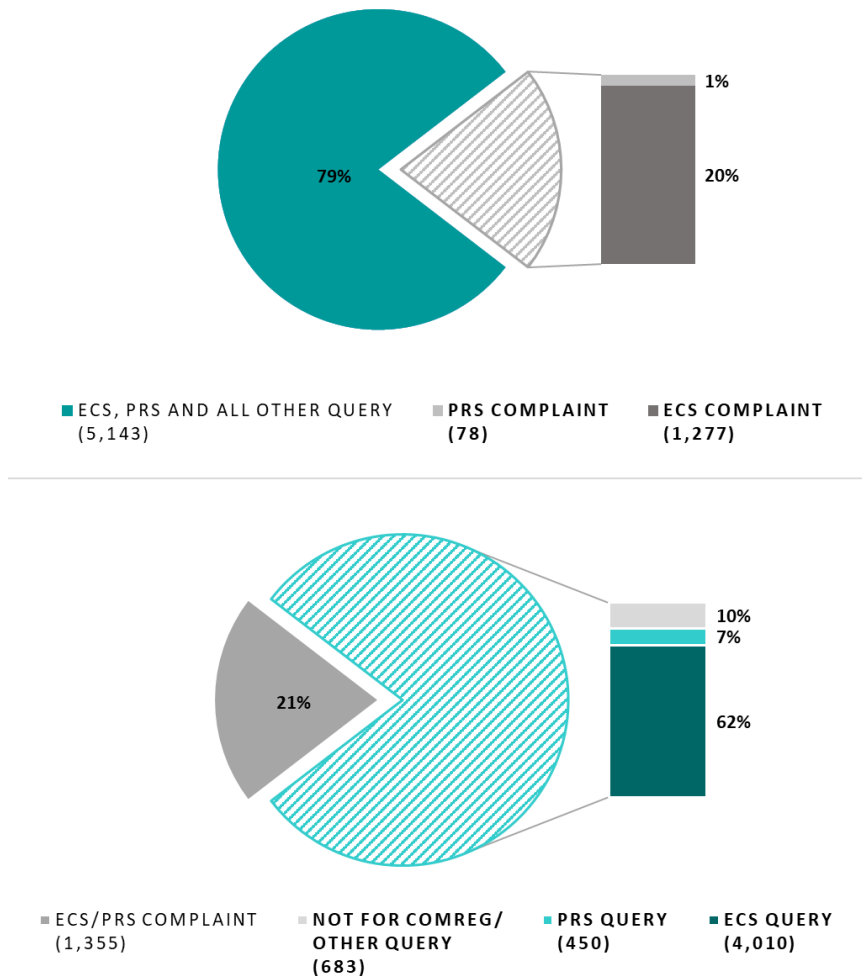


Figure 5: Split of issues recorded by issue type and category Q1 2021



Figure 6 shows the trend of ECS and PRS issues, split by query and complaint, over the last five quarters, which allows for a seasonal comparison of issues recorded in Q1 2020 to Q1 2021. From Q1 2020 to Q1 2021, ECS queries decreased by 2% and PRS queries decreased by 87%; ECS complaints increased by 18%, and PRS complaints decreased by 80%. See Figure 16 for detail on PRS issues by ECS Provider and short code. See Figure 9 and Figure 20 for a breakdown of ECS complaints by classification type.

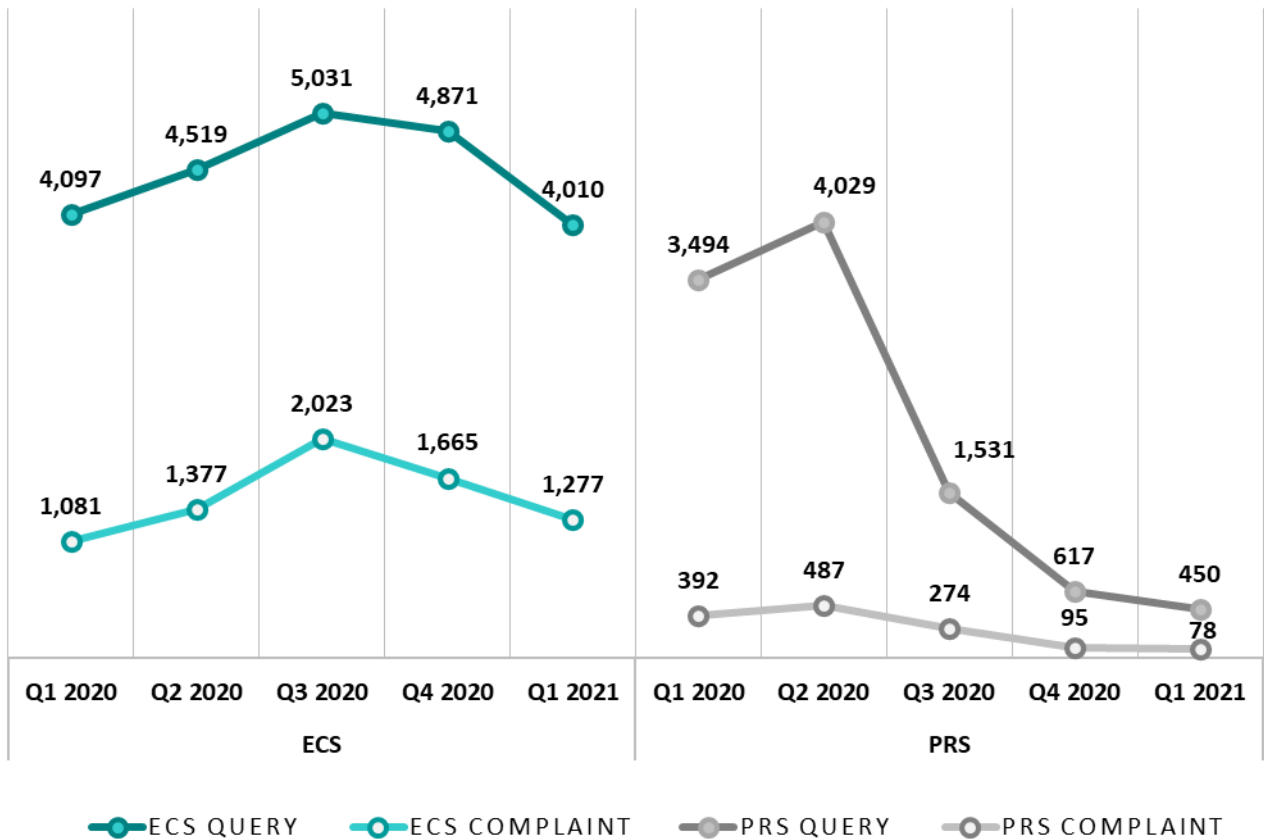


Figure 6: ECS and PRS complaints and queries recorded Q1 2020 – Q1 2021

# 4: Mobile Service Provider Statistics

## 4.1 Mobile Service Provider ECS Queries vs Complaints

Figure 7 shows the number of ECS queries and complaints recorded for Eir<sup>4</sup>, 3<sup>5</sup>, Vodafone<sup>6</sup> and 'Other' Mobile Service Providers<sup>7</sup>, comparing Q4 2020 to Q1 2021. The total number of issues recorded for Mobile Service Providers in Q1 2021 was 1,656, an 11% decrease compared to Q4 2020, where 1,855 issues were recorded.

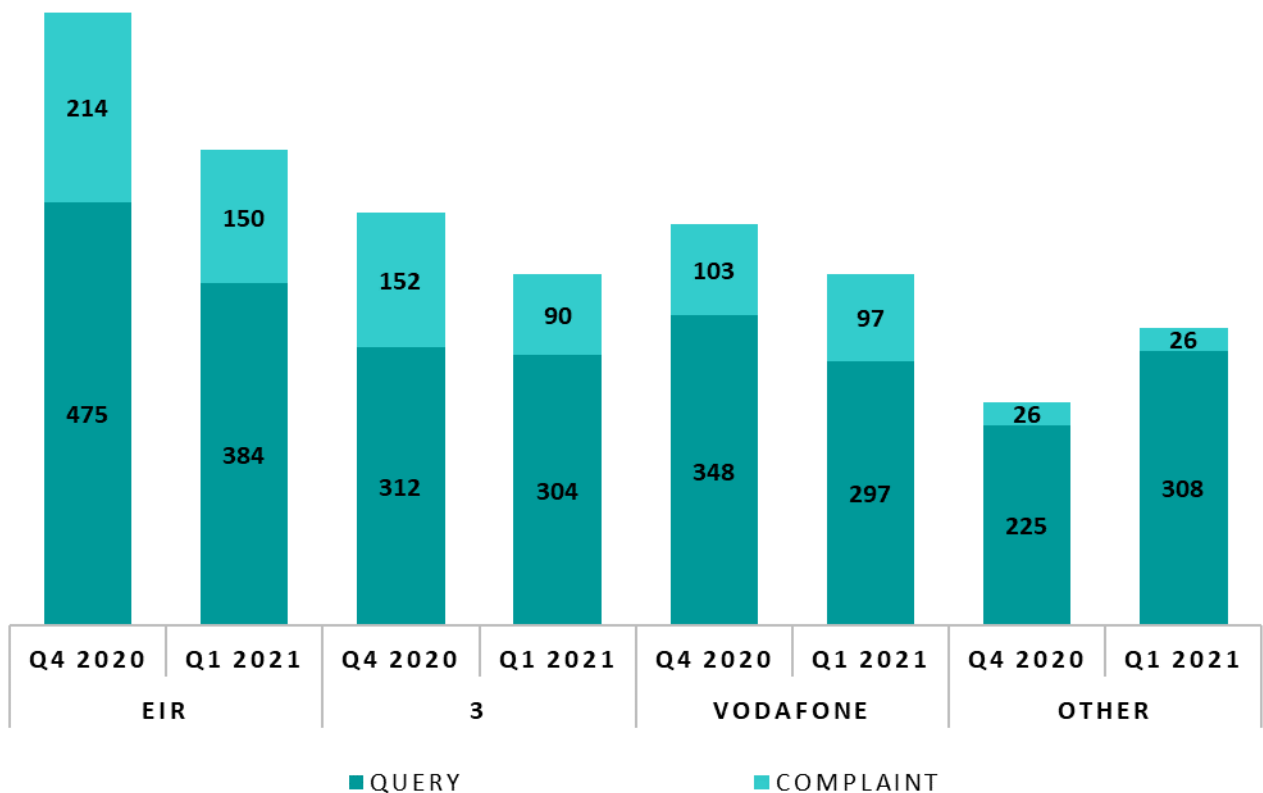


Figure 7: Number of ECS queries and complaints by Mobile Service Provider Q4 2020 vs Q1 2021

<sup>4</sup> On this chart, issues recorded for GoMo are included in Eir's figures.

<sup>5</sup> On this chart, issues recorded for 48 are included in 3's figures for Q1 2021.

<sup>6</sup> On this chart, issues recorded for Clear Mobile are included in Vodafone's figures for Q1 2021.

<sup>7</sup> 'Other' Mobile Service Providers includes issues recorded for those Mobile Service Providers not named in Figure 7, or where the Mobile Service Provider is not provided by the consumer. This allows a holistic view of issues recorded across all Mobile Service Providers.

Figure 8 shows the split of queries to complaints recorded for each Mobile Service Provider<sup>4,5,6,7</sup> in Figure 7, including the total industry average, comparing Q4 2020 to Q1 2021. The 'industry average' is based on all issues recorded within each quarter for all Mobile Service Providers.

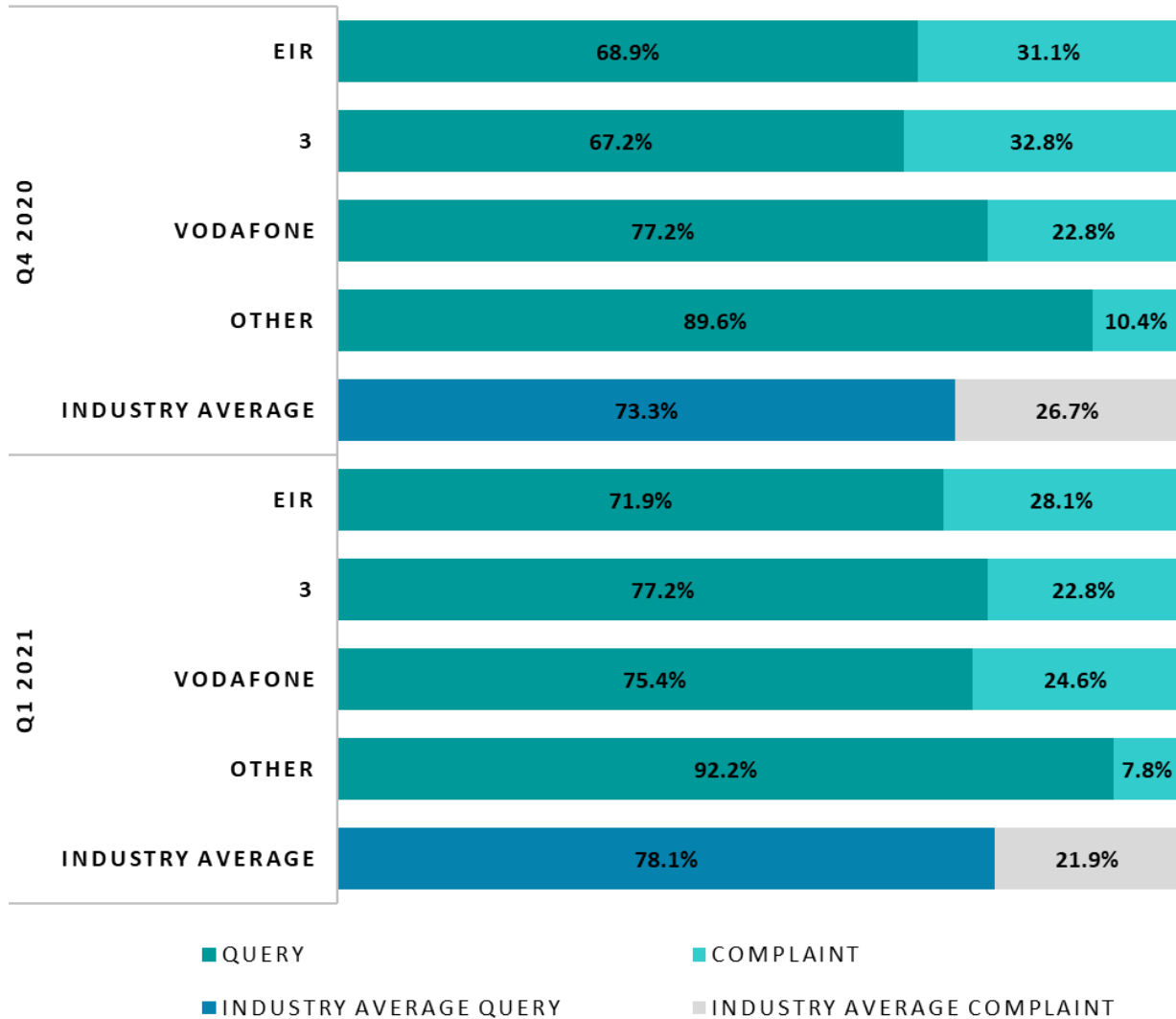
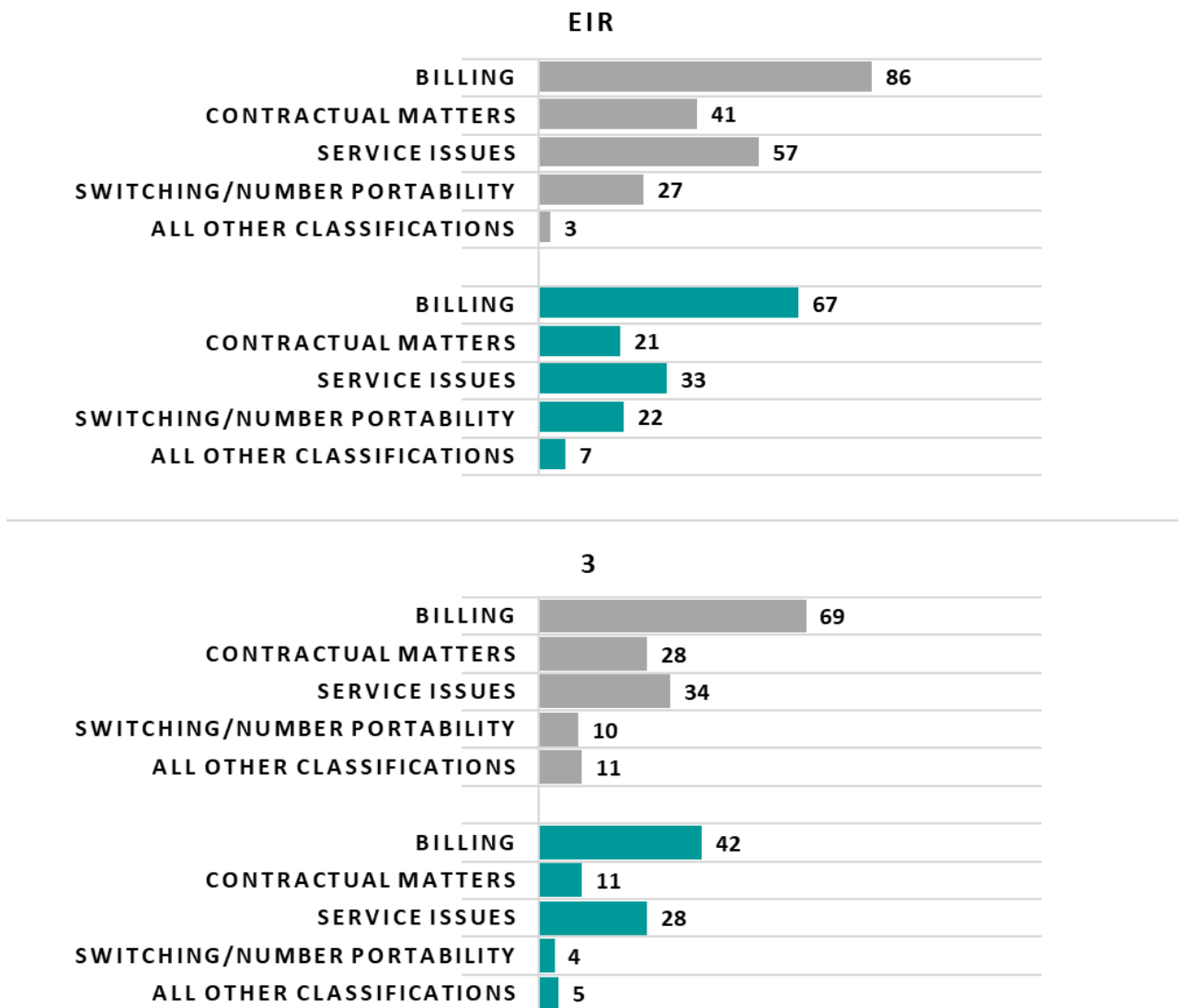


Figure 8: Split of ECS queries and complaints by Mobile Service Provider Q4 2020 vs Q1 2021

## 4.2 Mobile Service Provider ECS Complaints by Classification Type

Figure 9 shows ECS complaints by classification type for each Mobile Service Provider<sup>4,5,6,7</sup> listed in Figure 7, comparing Q4 2020 with Q1 2021. For details of the highest number of issues recorded for each Mobile Service Provider, see Figure 10.



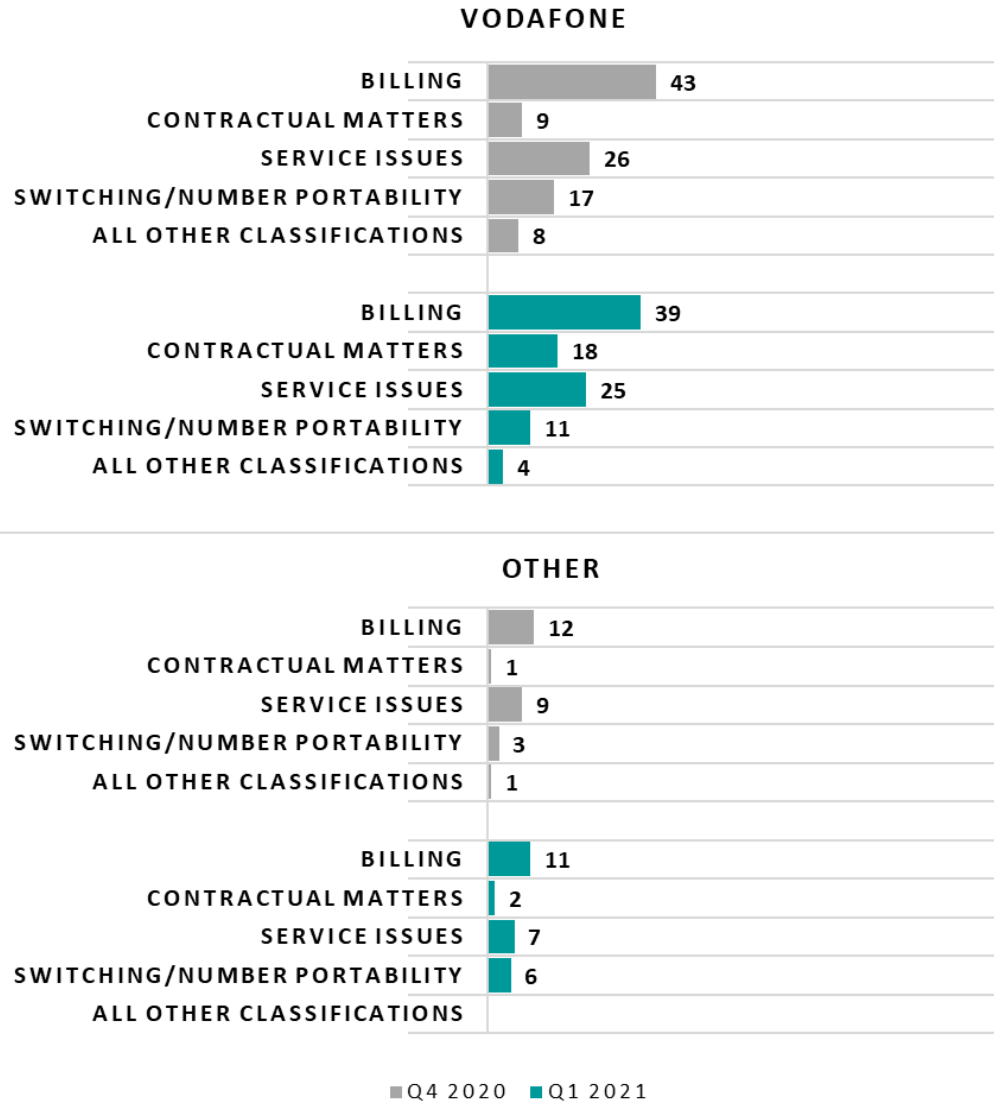


Figure 9: Mobile Service Provider ECS complaints by classification type Q4 2020 vs Q1 2021

### 4.3 Mobile Service Provider ECS Issues Recorded

The below table shows, in descending order, the highest number of issues recorded for each Mobile Service Provider<sup>4,5,6</sup> listed in Figure 7, as reported by consumers, comparing Q4 2020 to Q1 2021.

	Number of Issues Q4 2020	Number of Issues Q1 2021
<b>Eir</b>		
Billed more than agreed amount	80	60
Billed after cancellation	45	39
Mobile coverage	44	33
Service issues - intermittent service		29
Loss of service	63	28
Equipment issues - handset	31	26
Contract termination issues - cancellation procedures	47	24
Switching/number portability - unlock code issue	36	24
Switching/number portability - delay switching	28	22
Switching/number portability - number loss		22
<b>3</b>		
Billed more than agreed amount	60	59
Mobile coverage	33	40
Loss of service	20	22
Service issues - intermittent service	17	20
Credit not applied		18
Switching/number portability - unlock code issue	27	17
Equipment issues - handset	23	16
Net neutrality - broadband speeds received	22	16
Refund not received	35	14
Billed after cancellation	25	14

<b>Vodafone</b>		
Billed more than agreed amount	64	48
Loss of service	42	32
Switching/number portability - unlock code issue	50	28
Mobile coverage	30	23
Equipment issues - handset	24	21
Terms & conditions - unlimited/fair usage		20
Switching/number portability - delay switching	15	18
Billed after cancellation	27	16
Misleading sales	14	15
Refund not received	18	14

**Figure 10: Highest number of issues recorded by Mobile Service Provider Q4 2020 vs Q1 2021**

## 4.4 Mobile Service Provider ECS Complaints Closed in Q1 2021

Figure 11 shows the number of ECS complaints closed in Q1 2021, for each Mobile Service Provider<sup>4,5,6</sup> listed in Figure 7, broken down by number of working days open (Monday to Friday, and excluding public holidays). Complaints closed within Q1 2021 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

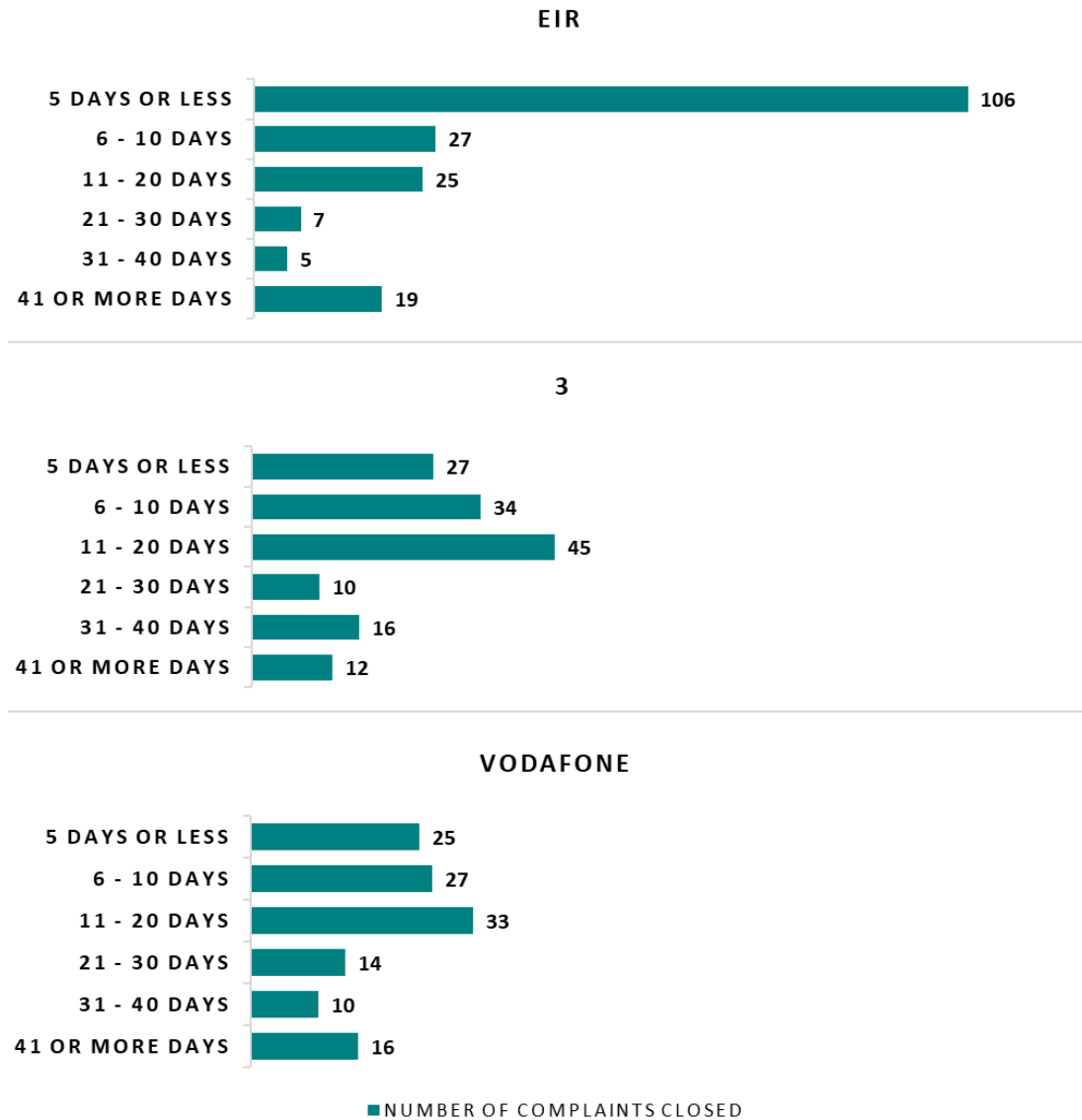


Figure 11: ECS complaints closed in Q1 2021 by Mobile Service Provider and number of working days open



Complaint resolution time is measured in working days, from the date ComReg first escalates the complaint to a Service Provider to the date of complaint closure. Figure 12<sup>4,5,6,7</sup> shows the median resolution time for ECS complaints in Figure 11, broken down by number of working days open (Monday to Friday, and excluding public holidays), comparing Q4 2020<sup>8</sup> to Q1 2021. Complaints closed within Q1 2021 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 January 2021. The 'industry median' is a 'snapshot' based on all complaints closed within each quarter for all Mobile Service Providers.

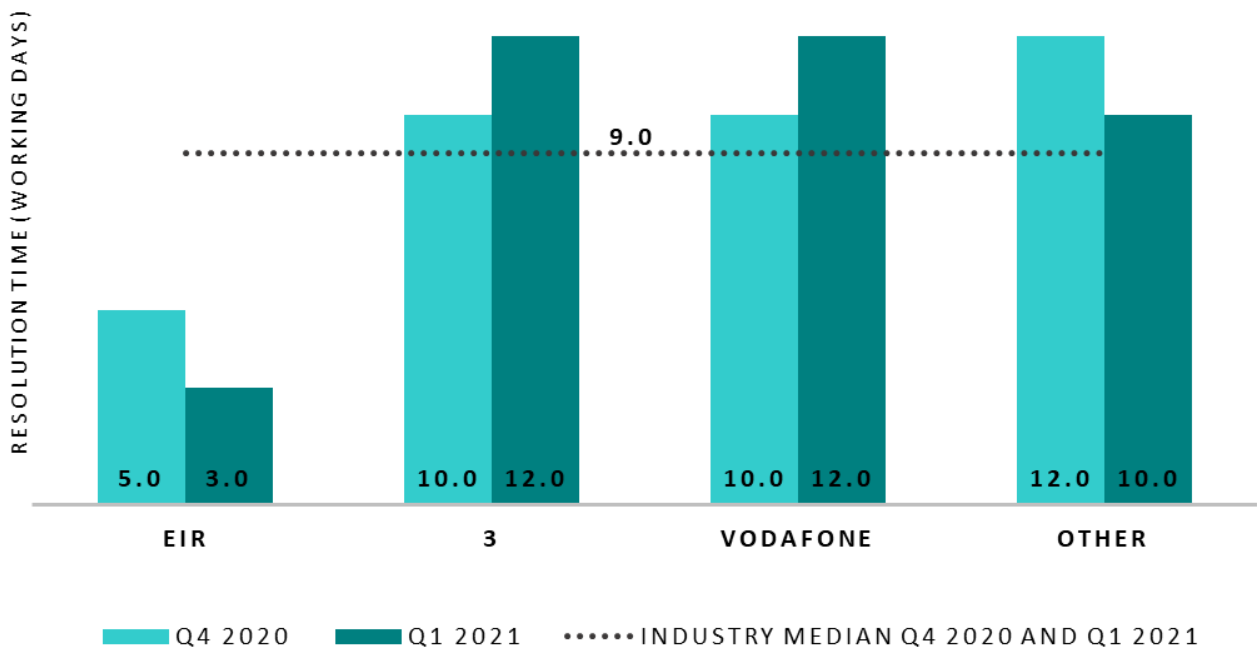
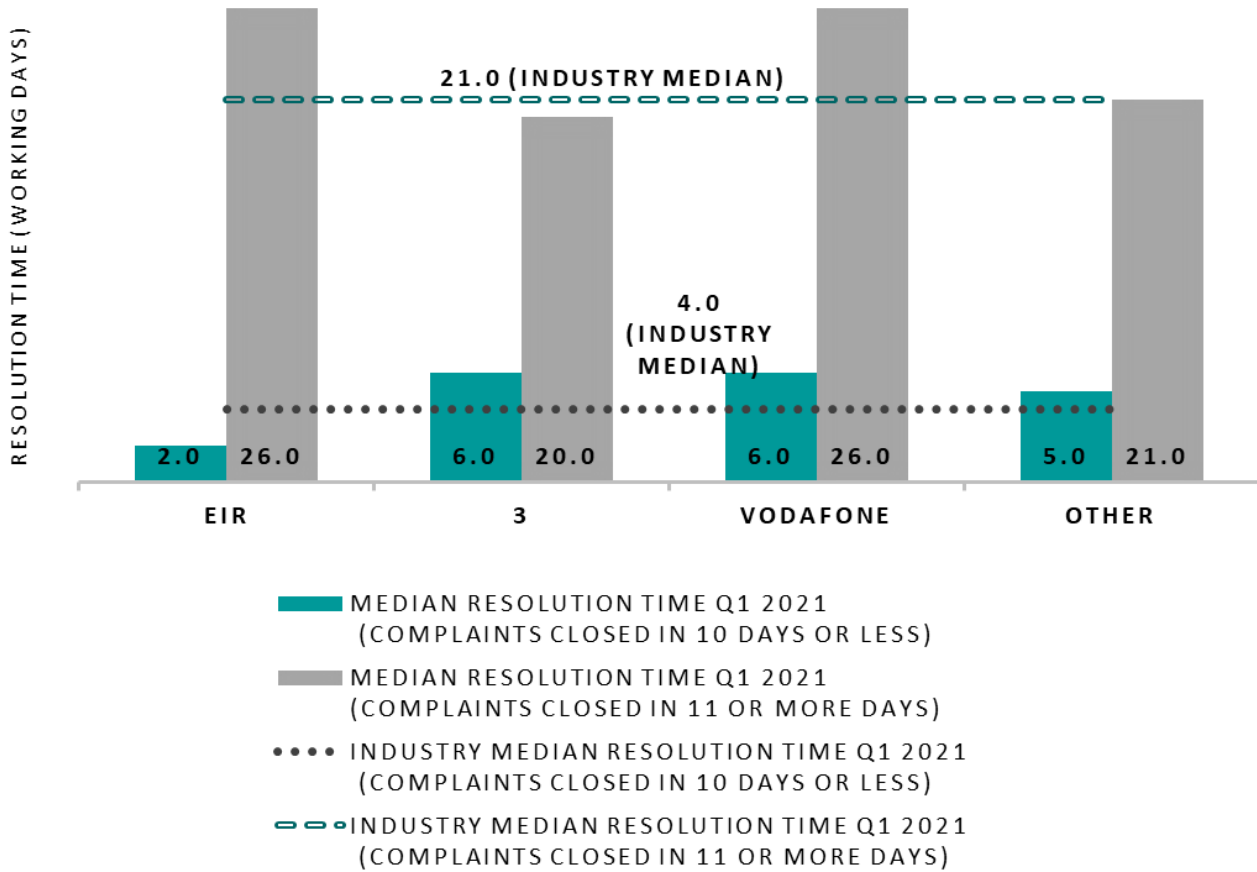


Figure 12: Median complaint resolution time by Mobile Service Provider Q4 2020 vs Q1 2021

<sup>8</sup> For details of complaints closed in Q4 2020, see ComReg Consumer Line Statistics Report Q4 2020.

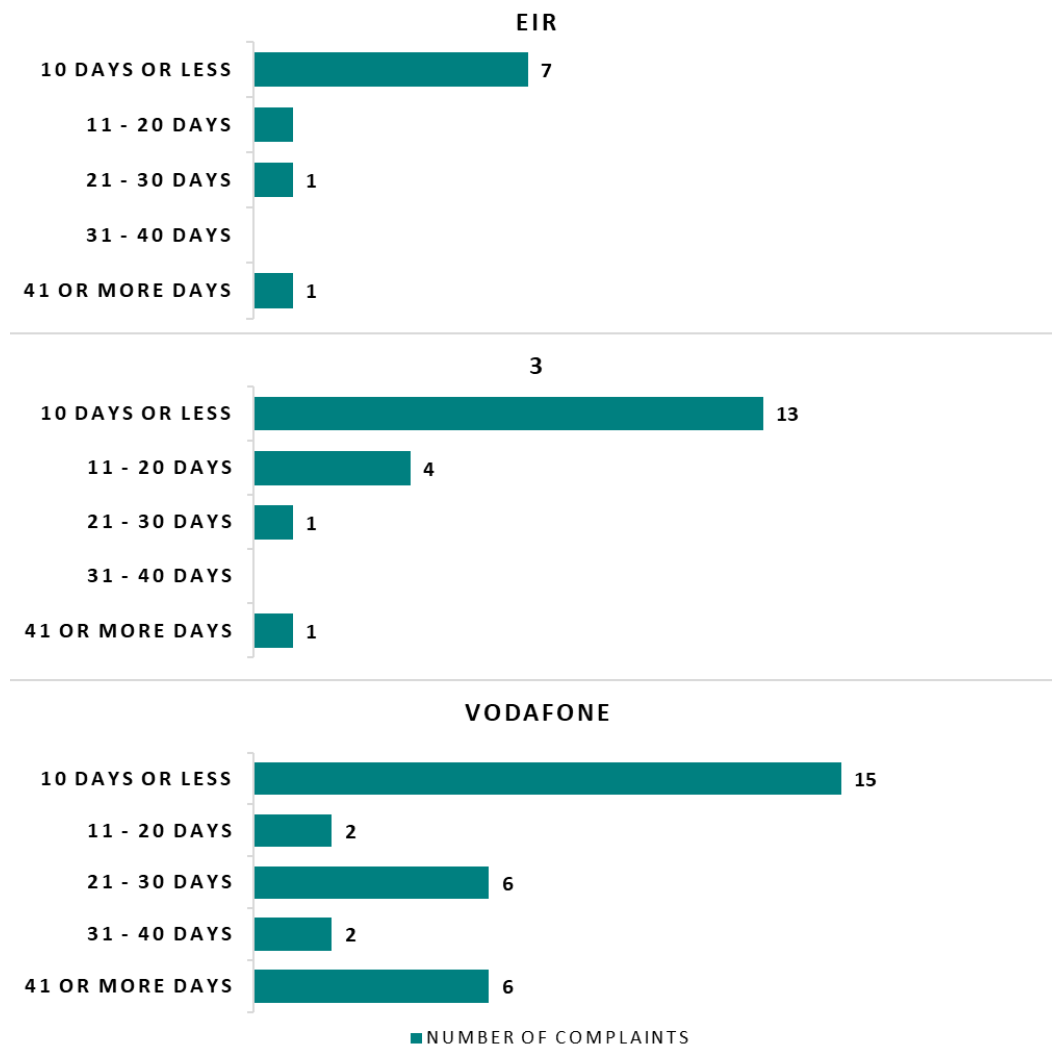
Figure 13<sup>4,5,6,7</sup> provides a further breakdown of the Q1 2021 complaint resolution time of ECS complaints in Figure 12. In Figure 13, the median resolution time is further broken down by a) complaints closed in 10 days or less, and b) complaints closed within 11 days or more. The ‘industry median’ is a ‘snapshot’ based on all complaints closed within the quarter for all Mobile Service Providers.



**Figure 13: Median complaint resolution time by Mobile Service Provider Q1 2021, complaints closed in 10 days or less vs complaints closed in 11 days or more**

## 4.5 Mobile Service Provider ECS Complaints Open at 31 March 2021

Figure 14 shows the number ECS complaints open at 31 March 2021, for each Mobile Service Provider<sup>4,5,6</sup> listed in Figure 7, broken down by the number of working days elapsed since they were first escalated to the Service Provider.



**Figure 14: Mobile Service Provider ECS complaints open at 31 March 2021 by number of working days since first escalation**

## 4.6 Mobile Service Provider ECS Complaints per 100,000 Subscribers

Figure 15 below shows the average number of complaints per 100,000 subscribers for each Mobile Service Provider<sup>4,5,6</sup> listed in Figure 7 and the total industry average, comparing Q4 2020 to Q1 2021. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Mobile Service Providers.



Figure 15: ECS complaints per 100,000 subscribers by Mobile Service Provider Q4 2020 vs Q1 2021

## 4.7 Mobile Service Provider PRS Issues

PRS texts are sent to five-digit short codes beginning with the number 5 (e.g. 57XXX), and texts to PRS typically cost more than ordinary texts, depending on the prefix number or short code. Figure 16 below shows the number of PRS issues raised with ComReg’s Consumer Line in Q1 2021 split by short code and premium rate service provider<sup>9</sup> (where the total number of issues recorded for the short code during the quarter is greater than 40 issues) and further split by Mobile Service Provider<sup>4,5</sup> (where the total number of issues recorded for the Mobile Service Provider is greater than 40 issues).

Network Operator	Short Code and Premium Rate Service Provider			Total
	57976 (txtNation Ltd)	57977 (txtNation Ltd)	Other	
<b>Eir</b>	112	33	73	218
<b>Tesco Mobile Ireland</b>	36	23	13	72
<b>3</b>	46	22	29	97
<b>Virgin Media</b>	35	6	7	48
<b>Other</b>	38	8	47	93
<b>Total</b>	267	92	169	528

**Figure 16: Number of PRS issues recorded by PRS short code, premium rate service provider and Mobile Service Provider Q1 2021**

<sup>9</sup> <http://www.irishstatutebook.ie/eli/2010/act/2/enacted/en/print>, Section 3.

“premium rate service provider” means a person who does any or all of the following, for gain: (a) provides the contents of a premium rate service, (b) exercises editorial control over the contents of a premium rate service, (c) packages together the contents of a premium rate service for the purpose of facilitating its provision, (d) makes available a facility as part of a premium rate service, (e) transfers a premium rate service from a content provider to one or more electronic communications networks, or (f) provides the electronic communications service over which a premium rate service is provided, or provides the electronic communications network over which a premium rate service is transmitted.

Figure 17 shows the average number of PRS issues recorded (rounded to the nearest whole number) per 100,000 subscribers for each Mobile Service Provider<sup>4,5</sup> listed in Figure 16 and the total industry average, comparing Q4 2020 to Q1 2021. The ‘industry average’ is based on all PRS issues recorded for all Mobile Service Providers within each quarter.

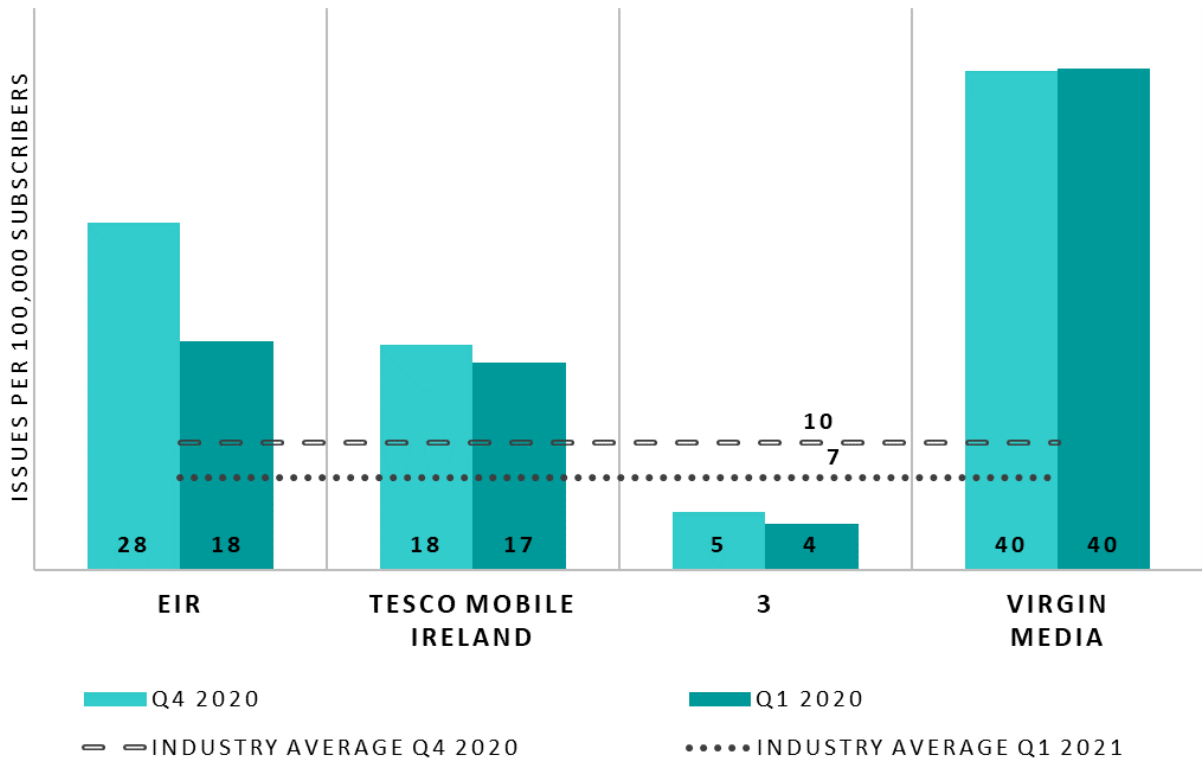


Figure 17: PRS issues by ECS Provider per 100,000 subscribers Q4 2020 vs Q1 2021

# 5: Fixed Service Provider Statistics

## 5.1 Fixed Service Provider ECS Queries vs Complaints

Figure 18 shows the number of ECS queries and complaints recorded for Eir, Imagine, Sky Ireland Limited, Virgin Media, Vodafone, and all ‘Other’<sup>10</sup> Fixed Service Providers, comparing Q4 2020 to Q1 2021. The total number of issues recorded for Fixed Service Providers in Q1 2021 was 3,631, a 22% decrease compared to Q4 2020, where 4,681 issues were recorded.

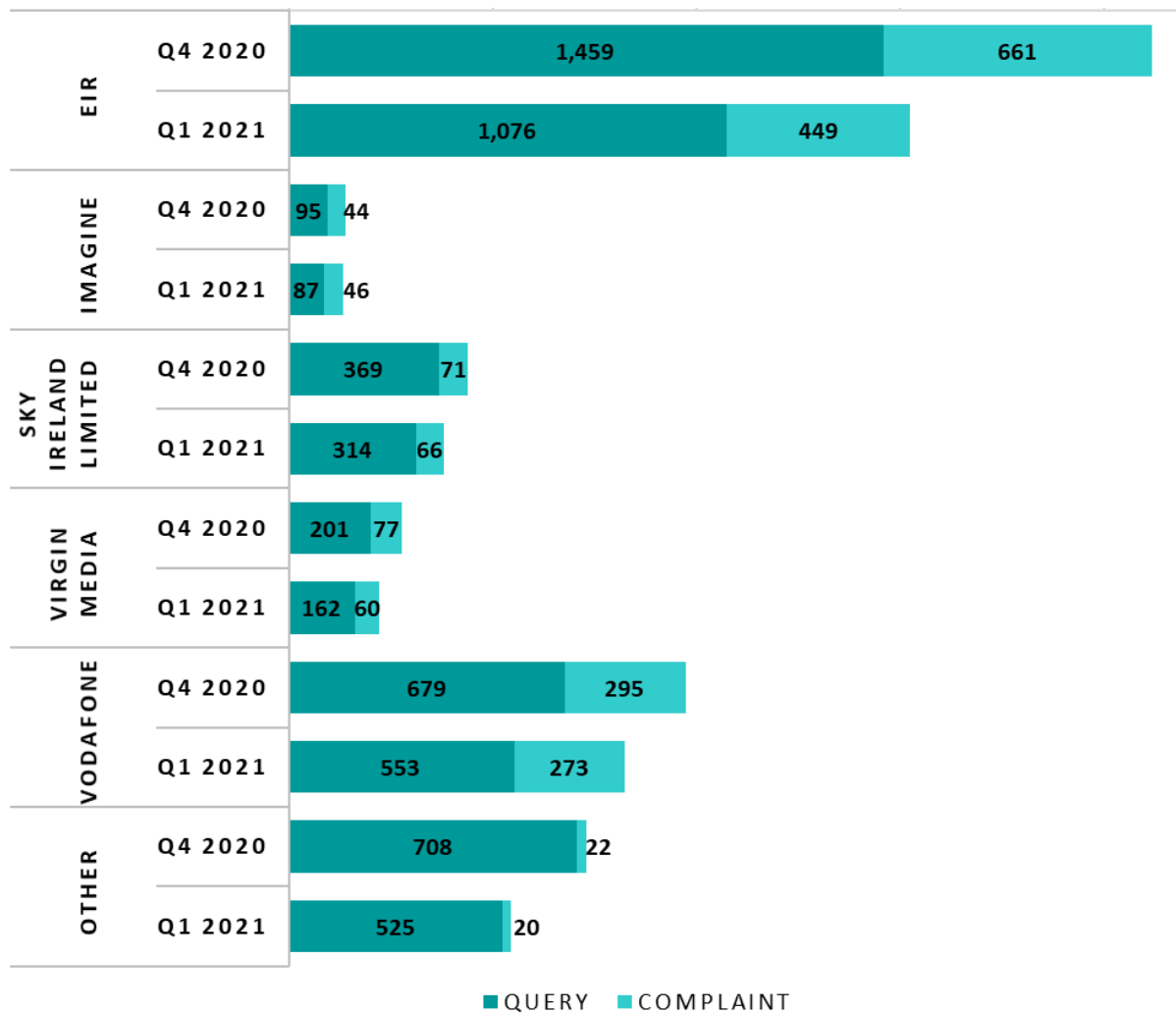


Figure 18: Number of ECS issues queries and complaints by Fixed Service Provider Q4 2020 vs Q1 2021

<sup>10</sup> ‘Other’ Fixed Service Providers includes issues recorded for those Fixed Service Providers not named in Figure 18, or where the Fixed Service Provider is not provided by the consumer. This allows a holistic view of issues recorded across all Fixed Service Providers.

Figure 19 shows the split of queries to complaints recorded for Eir, Imagine, Sky Ireland Limited, Virgin Media and Vodafone, including the total industry average comparing Q4 2020 to Q1 2021. The 'industry average' is based on all issues recorded within each quarter for all Fixed Service Providers.

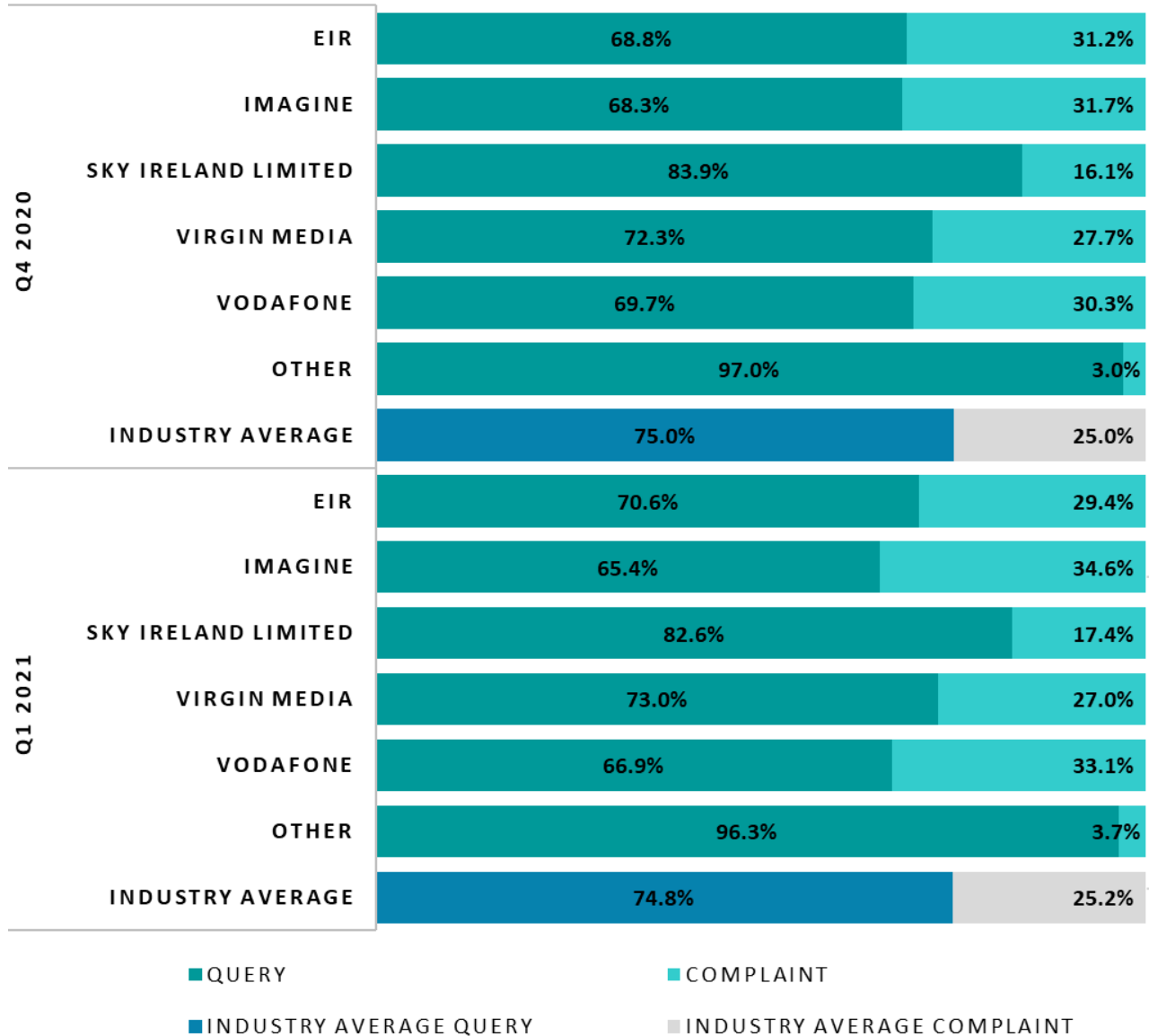
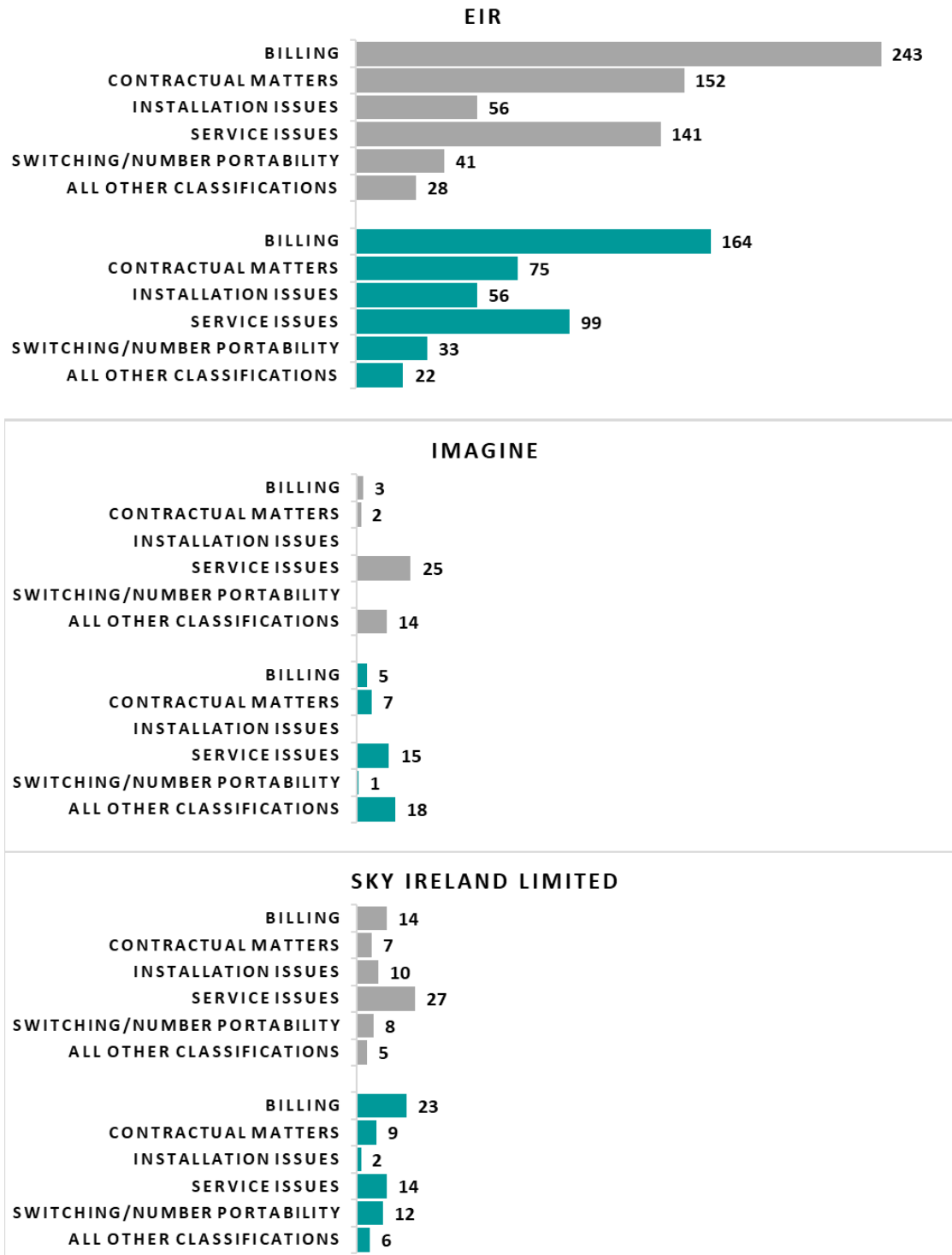


Figure 19: Split of ECS queries and complaints by Fixed Service Provider Q4 2020 vs Q1 2021



## 5.2 Fixed Service Provider ECS Complaints by Classification Type

Figure 20 shows ECS complaints by classification type for each Fixed Service Provider listed in Figure 18, comparing Q4 2020 with Q1 2021. For details of the highest number of issues recorded for each Fixed Service Provider, see Figure 21.



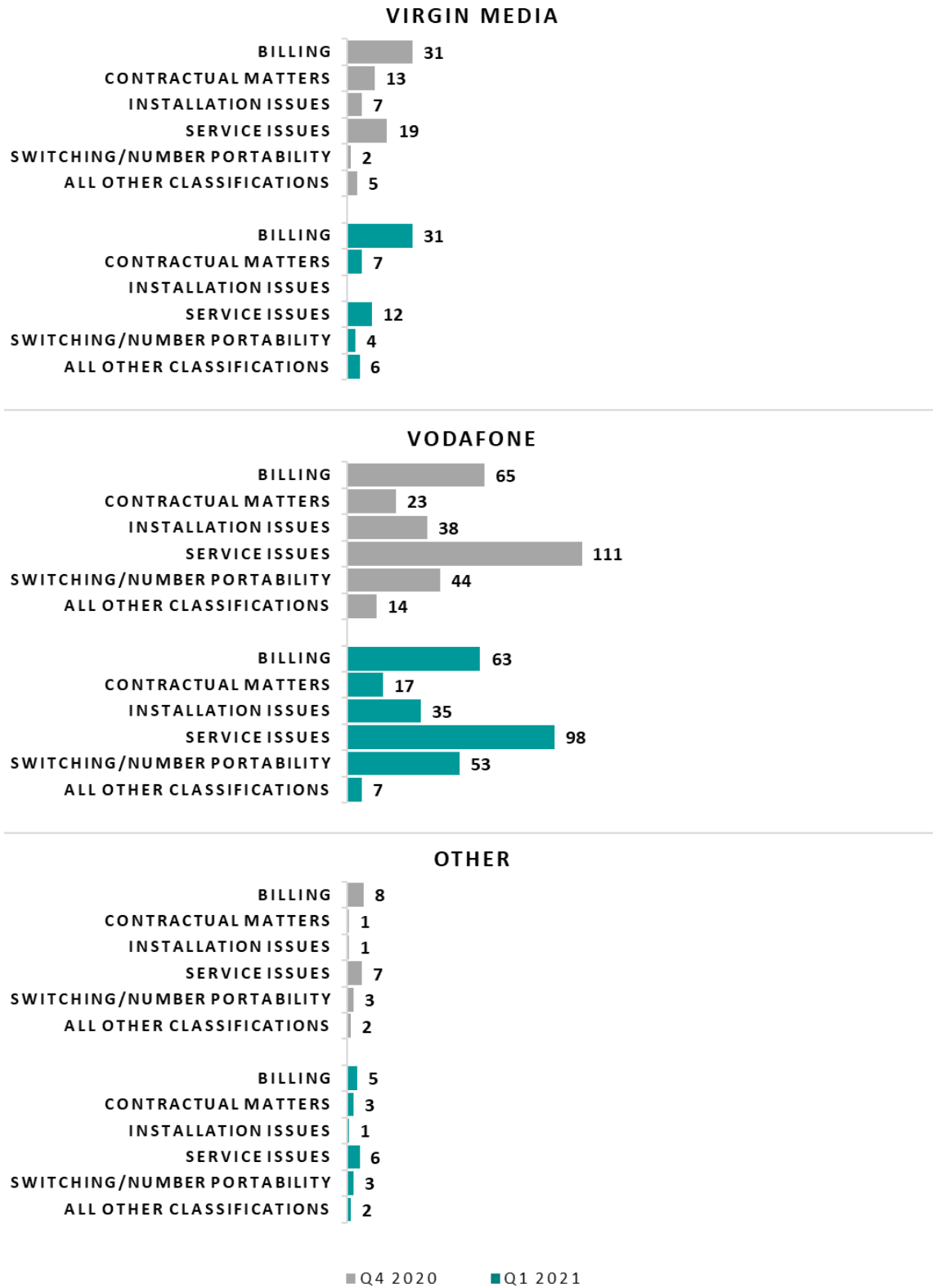


Figure 20: Fixed Service Provider ECS complaints by classification type Q4 2020 vs Q1 2021

### 5.3 Fixed Service Provider ECS Issues Recorded

The below table shows, in descending order, the highest number of ECS issues recorded for each Fixed Service Provider listed in Figure 18, as reported by consumers, comparing Q4 2020 to Q1 2021.

	Number of Issues Q4 2020	Number of Issues Q1 2021
<b>Eir</b>		
Loss of service	259	168
Billed more than agreed amount	196	167
Billed after cancellation	228	167
Contract termination issues - cancellation procedures	244	137
Delay in installation	104	120
Service issues - intermittent service	117	91
Service availability	108	85
Contract termination issues - cancellation not accepted	162	69
Refund not received	83	55
Switching/number portability - number loss		42
<b>Imagine</b>		
Net neutrality - broadband speeds received	42	48
Service issues - Intermittent service	46	35
Terms & conditions - unlimited/fair usage	4	15
Loss of service	13	8
Billed after cancellation	3	3
Switching/number portability - delay switching		3
Service availability	4	2
Contract termination issues - cancellation not accepted	3	2
Refund not received		2
Equipment issues - modem		2

<b>Sky Ireland Limited</b>		
Loss of service	72	44
Billed more than agreed amount	44	42
Billed after cancellation	29	41
Service issues - intermittent service	35	29
Delay in installation	27	26
Contract termination issues - cancellation not accepted	17	18
Accessing complaints process - issue lodging formal complaint		17
Contract termination issues - cancellation procedures	31	15
Net neutrality - broadband speeds received	17	15
Switching/number portability - delay switching		15
<b>Virgin Media</b>		
Billed more than agreed amount	46	35
Billed after cancellation	18	30
Service issues - intermittent service	23	16
Loss of service	20	12
Refund not received		12
Net neutrality - broadband speeds received		11
Contract termination issues - cancellation procedures	23	10
Billed for service not received		7
Pricing transparency		7
Delay in installation	11	6
<b>Vodafone</b>		
Loss of service	204	158
Switching/number portability - number loss	48	88
Delay in installation	90	79
Service issues - intermittent service	83	76
Billed after cancellation	76	64
Billed more than agreed amount	57	53
Net neutrality - broadband speeds received	51	34
Switching/number portability - delay switching	42	30
Service availability		22
Refund not received		20

Figure 21: Highest number of issues recorded by Fixed Service Provider Q4 2020 vs Q1 2021

## 5.4 Fixed Service Provider ECS Complaints Closed in Q1 2021

Figure 22 below shows ECS complaints closed in Q1 2021, for each Fixed Service Provider listed in Figure 18, broken down by number of working days. Complaints closed within Q1 2021 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

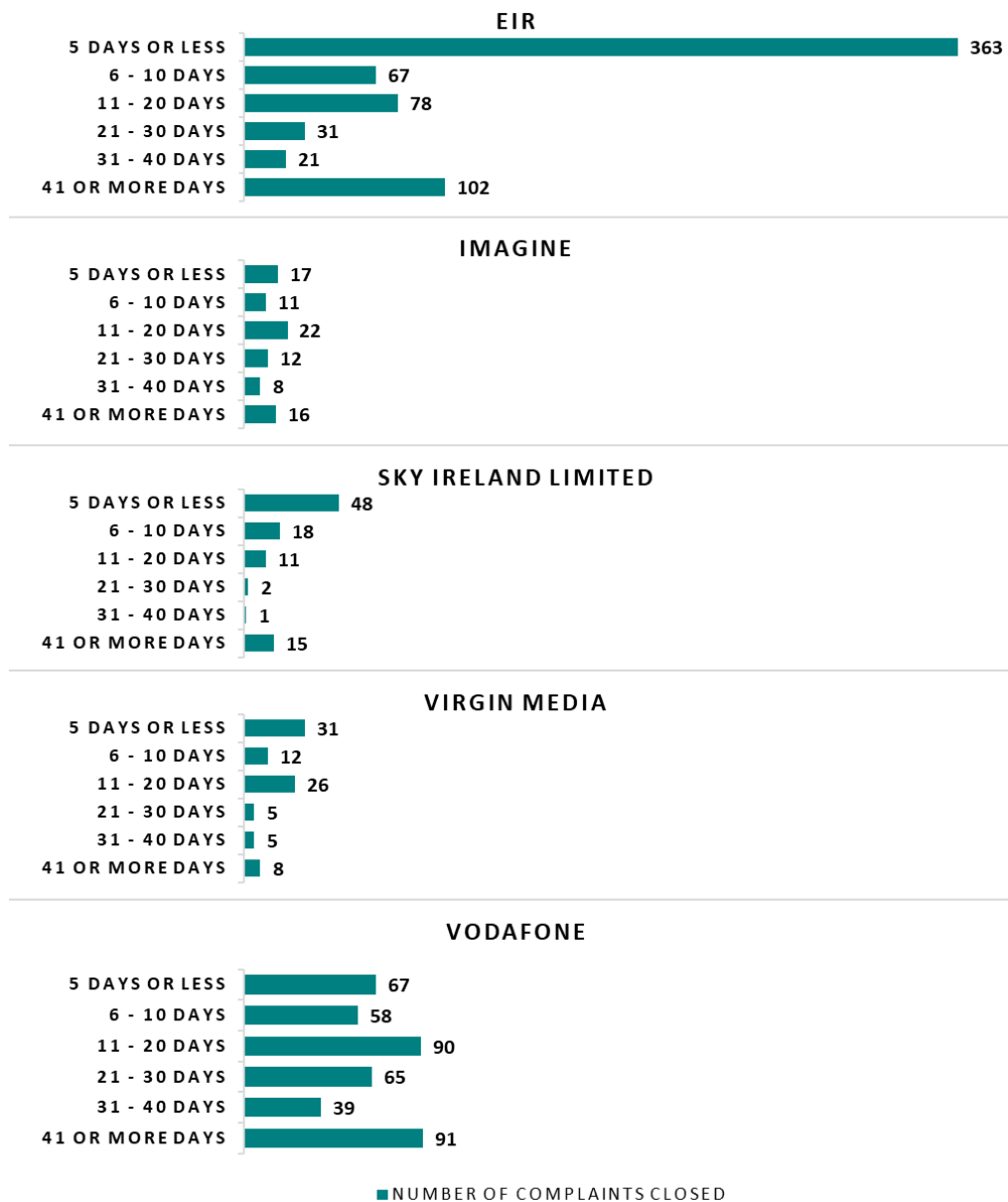


Figure 22: Fixed Service Provider ECS complaints closed in Q1 2021 by number of working days open

Complaint resolution time is measured in working days, from the date ComReg first escalates the complaint to a Service Provider to the date of complaint closure. Figure 23 shows the median resolution time for ECS complaints in Figure 22, broken down by number of working days open (Monday to Friday, and excluding public holidays), comparing Q4 2020<sup>Error! Bookmark not defined.</sup> to Q1 2021. Complaints closed within Q1 2021 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 January 2021. The ‘industry median’ is a ‘snapshot’ based on all complaints closed within each quarter for all Fixed Service Providers.

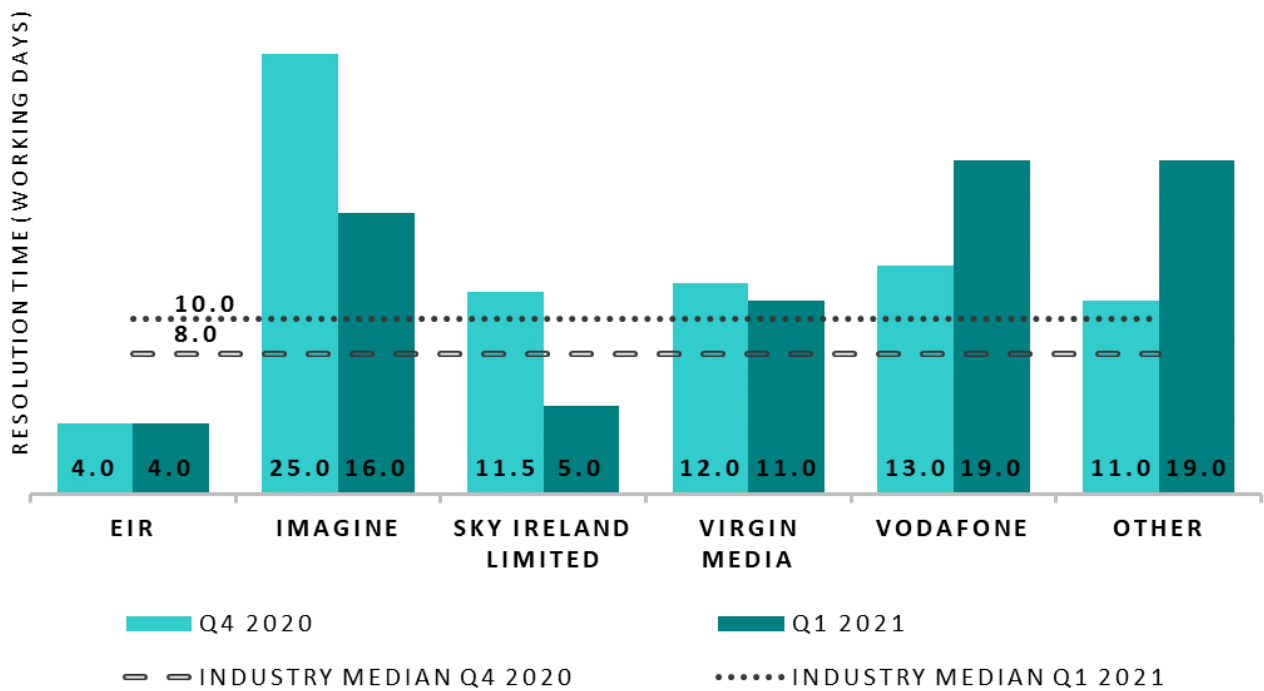


Figure 23: Median complaint resolution time by Fixed Service Provider Q4 2020 vs Q1 2021

Figure 24 provides a further breakdown of the Q1 2021 complaint resolution time of ECS complaints in Figure 23. In Figure 24, the median resolution time is further broken down by a) complaints closed in 10 days or less, and b) complaints closed within 11 days or more. The 'industry median' is a 'snapshot' based on all complaints closed within the quarter for all Fixed Service Providers.

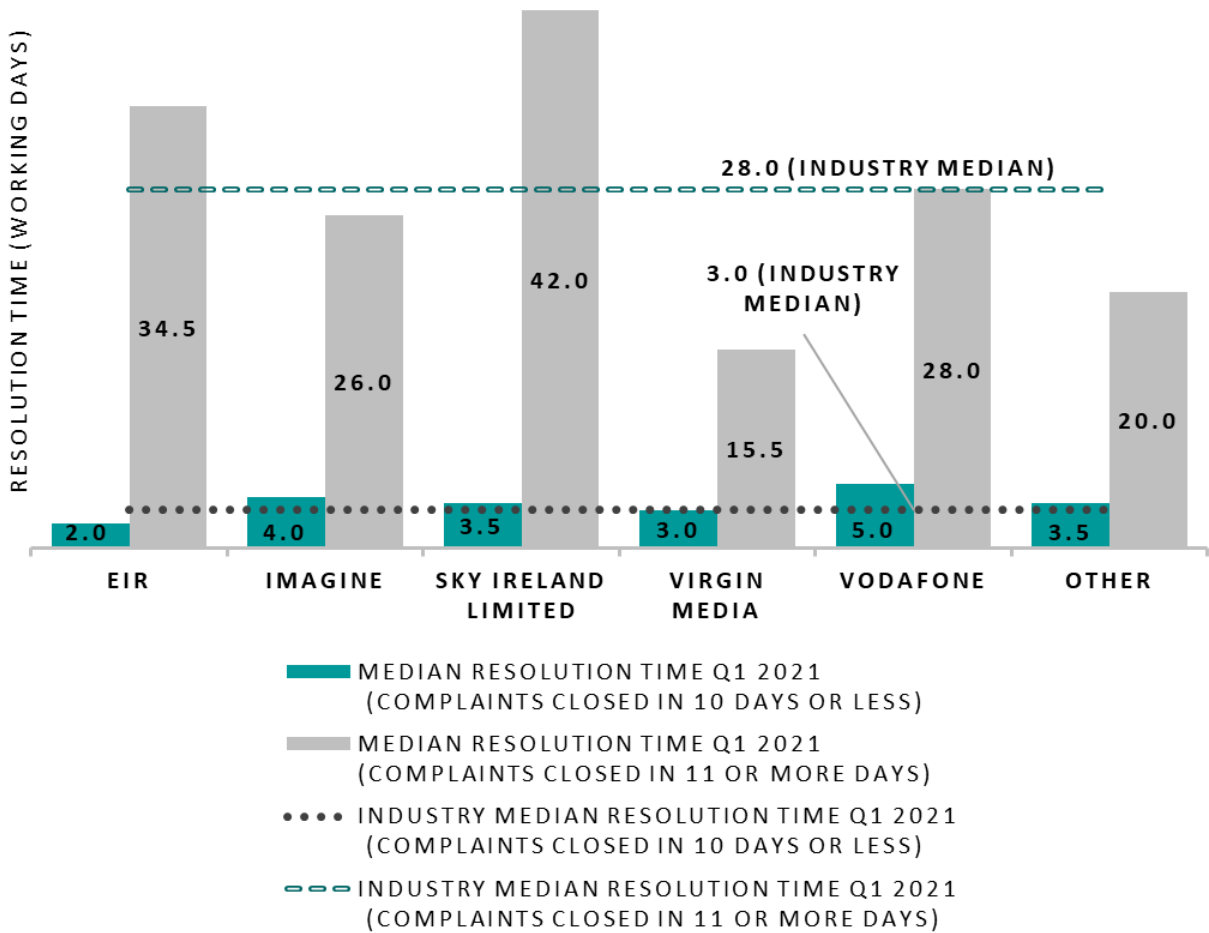


Figure 24: Median complaint resolution time by Fixed Service Provider Q1 2021, complaints closed in 10 days or less versus complaints closed in 11 days or more

## 5.5 Fixed Service Provider ECS Complaints Open at 31 March 2021

Figure 25 shows the number of ECS complaints open at 31 March 2021, for each Fixed Service Provider listed in Figure 18, broken down by number of working days elapsed since they were first escalated to the Service Provider.

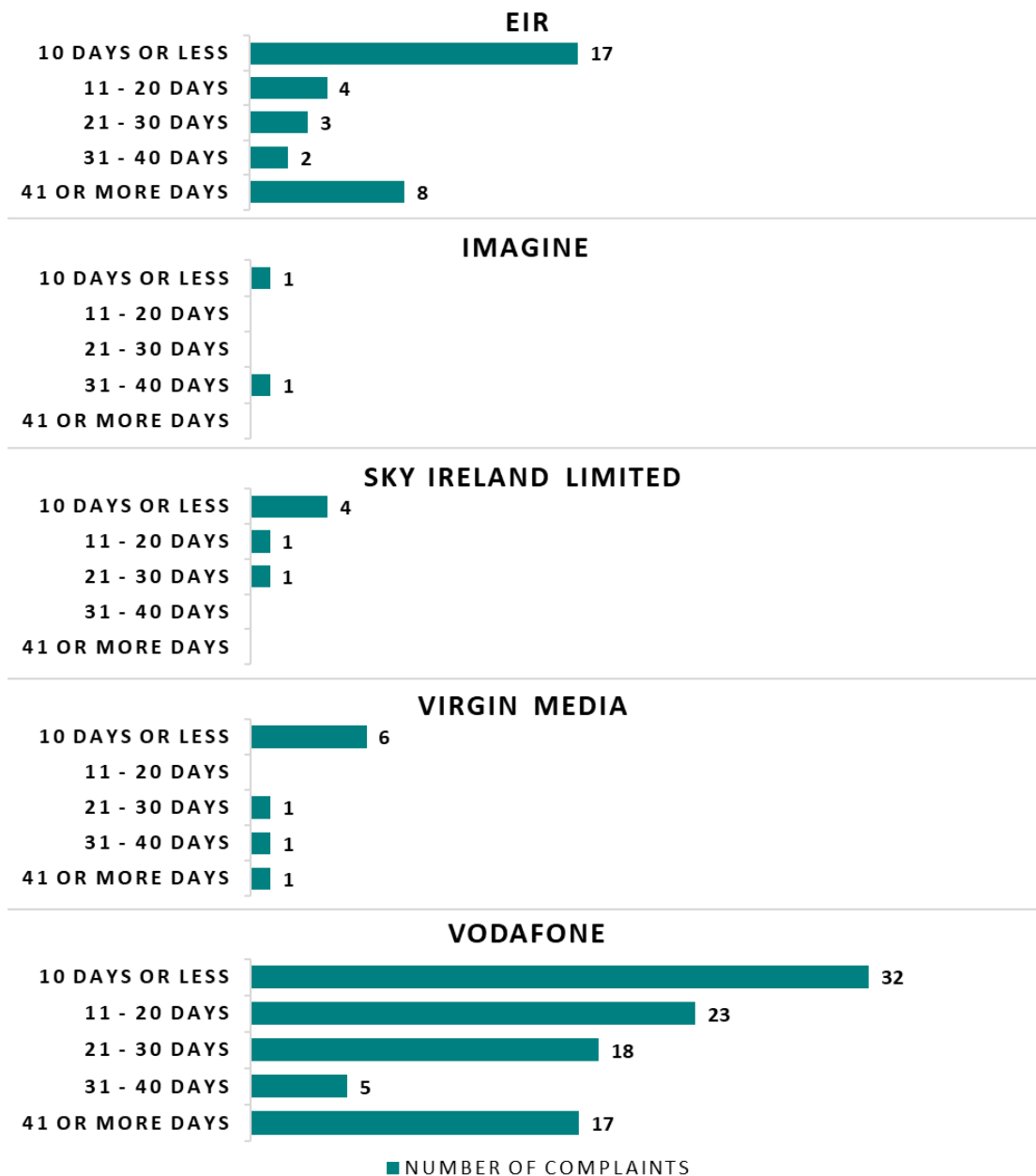


Figure 25: Fixed Service Provider ECS complaints open at 31 March 2021 by number of working days since first escalation



## 5.6 Fixed Service Provider ECS Complaints per 100,000 Subscribers

Figure 26 below shows the average complaint rate per 100,000 subscribers for each Fixed Service Provider listed in Figure 18<sup>11</sup> and the total industry average, comparing Q4 2020 to Q1 2021. The ‘industry average’ is a ‘snapshot’ based on complaints received for all Fixed Service Providers.

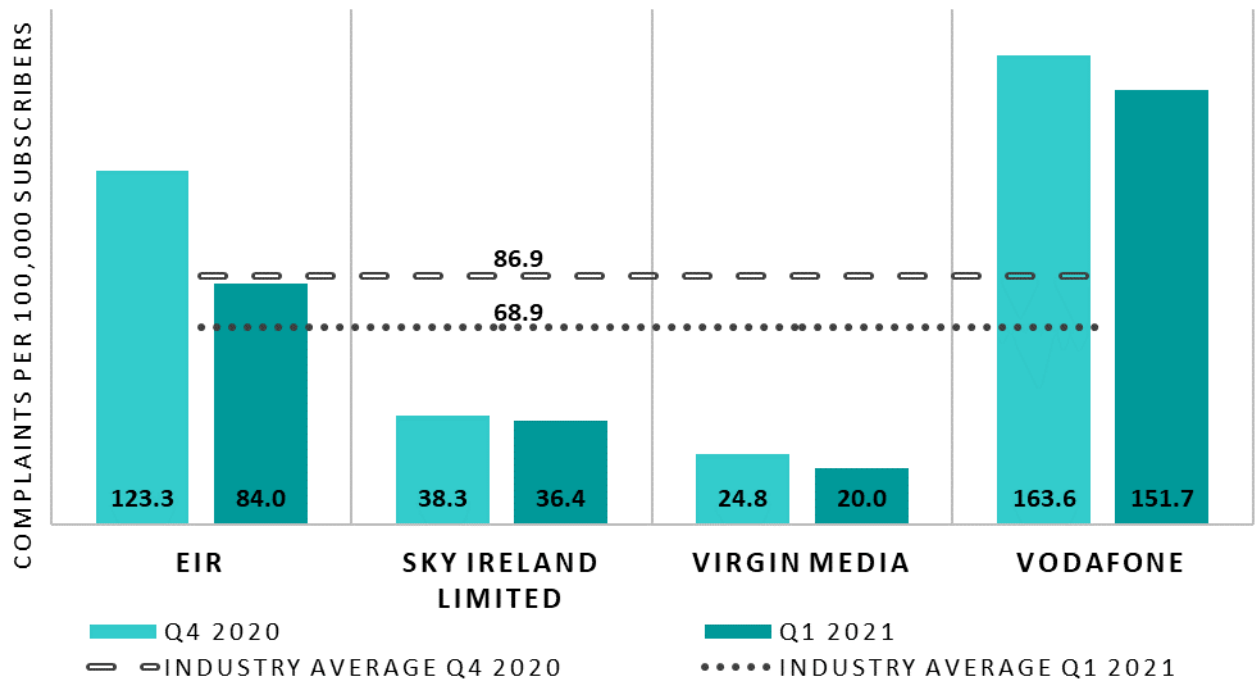


Figure 26: ECS complaints by Fixed Service Provider per 100,000 subscribers Q4 2020 vs Q1 2021

<sup>11</sup> Where subscriber data for the Fixed Service Provider is publicly available.

# Annex 1: ComReg Consumer Line Contact Details



\*The message will be charged at the standard text rate. If you have any problems with the service, please let us know at 01 804 9668.

\*\*Please outline the issue you need assistance with and we will respond to you by text. Please use keyword *ASKCOMREG* in all text messages, including replies.

## Annex 2: Mobile Coverage Statistics

Figure 27 below shows the number of mobile coverage issues versus all other service issues (as reported by consumers) for each Mobile Service Provider<sup>4,5,6,7</sup> listed in Figure 7, comparing Q4 2020 to Q1 2021.

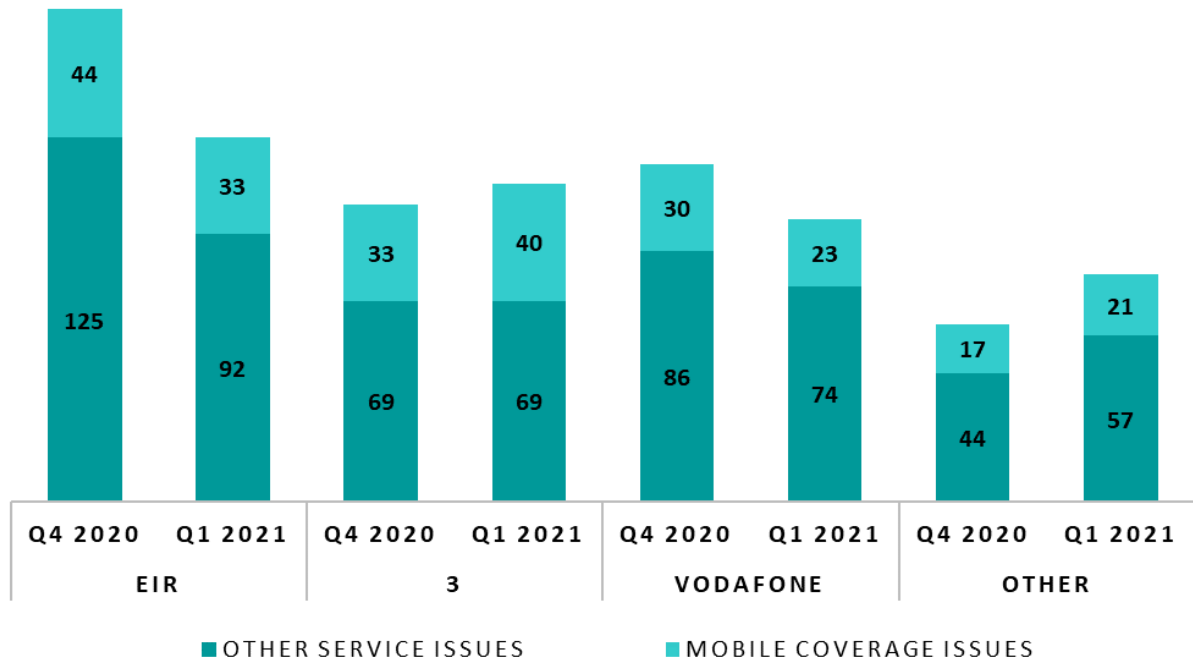
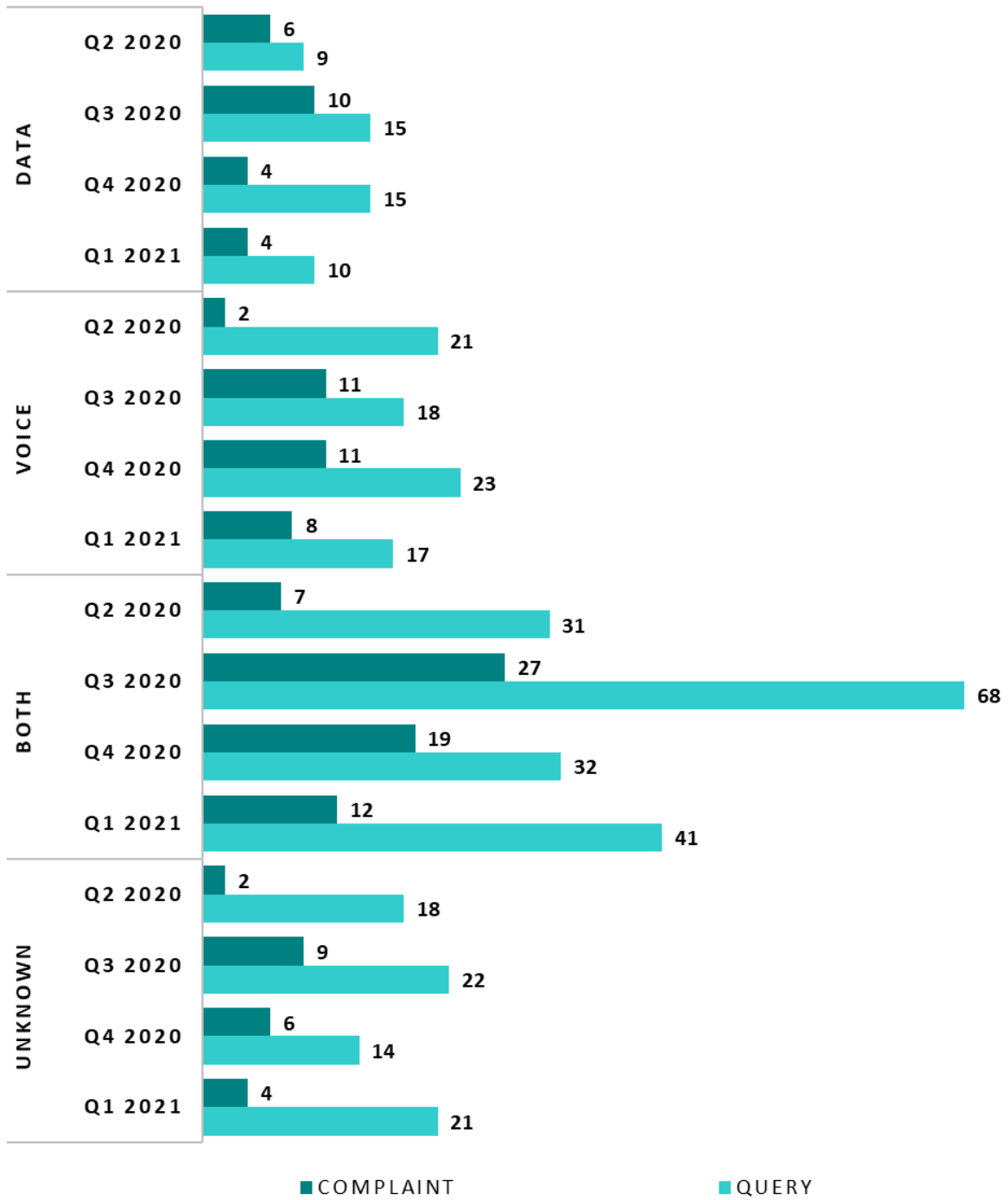


Figure 27: Number of ECS service issues by Mobile Service Provider Q4 2020 vs Q1 2021



\*Unknown refers to contacts from consumers (by email) where relevant information pertaining to type or frequency has not been provided

Figure 28: Mobile Coverage Issues by Type Q2 2020 – Q1 2021

Figure 29 shows the average number of mobile coverage issues recorded per 100,000 subscribers for each Mobile Service Provider<sup>4,5</sup> listed in Figure 7. The ‘industry average’ is based on mobile coverage issues recorded for all Mobile Service Providers within each quarter.

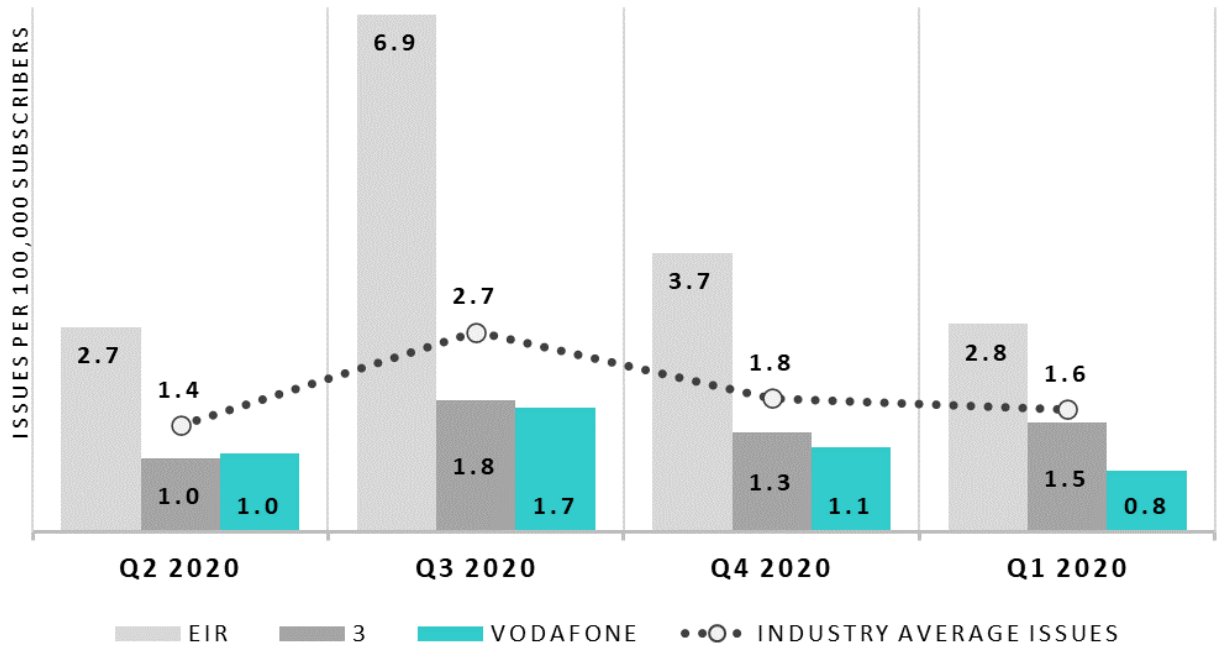


Figure 29: Mobile Coverage issues (per 100,000 Subscribers) Q2 2020 – Q1 2021

## Annex 3: Classification Type Index

This Classification Type Index reflects the classification and sub-classification types<sup>12</sup> relevant to highest volume issues recorded in Q1 2021<sup>13</sup>.

<p><b>Billing includes:</b></p> <ul style="list-style-type: none"> <li>Billed after cancellation</li> <li>Billed for service not received</li> <li>Billed more than agreed amount</li> <li>Credit not applied</li> <li>Refund not received</li> </ul>
<p><b>Contractual Matters includes:</b></p> <ul style="list-style-type: none"> <li>Contract termination issues - cancellation not accepted</li> <li>Contract termination issues - cancellation procedures</li> <li>Misleading sales</li> <li>Pricing transparency</li> <li>Terms &amp; conditions - unlimited/fair usage</li> </ul>
<p><b>Customer Service includes:</b></p> <ul style="list-style-type: none"> <li>Accessing complaints process - issue lodging formal complaint</li> </ul>
<p><b>Installation Issues includes:</b></p> <ul style="list-style-type: none"> <li>Delay in installation</li> </ul>
<p><b>Other ECS includes:</b></p> <ul style="list-style-type: none"> <li>Net neutrality - broadband speeds received</li> </ul>
<p><b>Service Issues includes:</b></p> <ul style="list-style-type: none"> <li>Equipment issues - handset</li> <li>Loss of service</li> <li>Mobile coverage</li> <li>Service availability</li> <li>Service issues - intermittent service</li> </ul>
<p><b>Switching/Number Portability Issues includes:</b></p> <ul style="list-style-type: none"> <li>Delay switching</li> <li>Number loss</li> <li>Unlock code issue</li> </ul>

<sup>12</sup> Sub-classification types may vary each quarter based on the nature of issues reported by consumers.

<sup>13</sup> For detail on classification and sub-classification types relevant to highest volume issues recorded in Q4 2020, see ComReg Consumer Line Statistics Report Q4 2020.

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