



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

# Proposals for Implementing a Customer Charter

Response to Consultation, Further Consultation  
and Draft Decision

**Reference:** ComReg 25/05

**Version:** Final

**Date:** 16/01/2025

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

1 Lárcheantar na nDugaí, Sráid na nGildeanna, BÁC 1, Éire, D01 E4X0.  
One Dockland Central, Guild Street, Dublin 1, Ireland, D01 E4X0.  
Teil | Tel +353 1 804 9600 Suíomh | Web [www.comreg.ie](http://www.comreg.ie)

## Legal Disclaimer

This Response to Consultation, Further Consultation and Draft Decision 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.

# Content

Section	Page
Glossary of Terminology .....	4
1 Executive Summary .....	5
1.1 Introduction.....	5
1.2 Purpose of document .....	6
1.3 Next steps .....	8
2 Sample Customer Charter .....	10
2.1 Summary Proposals and Rationale .....	19
3 Submitting Responses and Next Steps .....	23
3.1 Legal Basis.....	23
3.2 We ask the following questions .....	23
3.3 Response Timeframe .....	24
3.4 Confidential Information .....	24
3.5 Responses To .....	24
3.6 Next Steps.....	25

## Appendices

### Appendix A – Draft Decision Instrument and Schedules

Schedule 1: Customer Charter Template

Schedule 2: Requirements for Completing the Customer Charter Template

Schedule 3: Draft Data Dictionary and Reporting Template

Schedule 4: Form of Sign-off by an Officer of the Company

### Appendix B – Draft Regulatory Impact Assessment

### Appendix C – Response to Consultation 23/14

### Appendix D – Submissions to Consultation 23/14

# Glossary of Terminology

Acronyms are set out in Table 1.

**Table 1: Glossary of Key Acronyms**

<b>Acronyms</b>	
<b>BEREC</b>	Body of European Regulators for Electronic Communications
<b>CCPC</b>	Competition and Consumer Protection Commission
<b>ComReg</b>	Commission for Communications Regulation
<b>ECS</b>	Electronic Communications Services
<b>IAS</b>	Internet Access Service
<b>ICS</b>	Interpersonal Communications Service
<b>NDA</b>	National Disability Authority
<b>QoS</b>	Quality of Service

# 1 Executive Summary

## 1.1 Introduction

- 1.1 ComReg is the independent regulator for the electronic communications sector in Ireland. In exercising its statutory functions, ComReg has the objectives of promoting competition among providers of ECS, whilst promoting the interests of end-users of ECS.<sup>1</sup> ComReg's consumer role is to protect and inform consumers so that harms are overcome, and that they can choose and use communications services.<sup>2</sup>
- 1.2 Customer service<sup>3</sup> is a vital aspect of a customer's experience in any service industry. In a well-functioning, competitive market, quality of service should be a key aspect that service providers compete on to attract and retain customers. However, ComReg is of the view that the electronic communications market in Ireland continues to leave significant room for improvement in terms of consumer satisfaction with quality of customer service received from service providers.<sup>4</sup> ComReg has identified a lack of transparency around levels of quality of customer service that may be expected by end-users in the Irish electronic communications market as contributing to customer service issues.
- 1.3 The Communications Regulation and Digital Hub Development Agency (Amendment) Act 2023 ("2023 Act")<sup>5</sup> empowers ComReg to protect consumers and other end-users (including microenterprises, small enterprises and not-for-profit organisations) by means of the introduction of requirements for Service Providers, amongst other things, for a Customer Charter ("Charter") in the form and manner which ComReg specifies.
- 1.4 ComReg's focus is on creating transparency of customer service levels for electronic communications customers in Ireland. The Charter is a document that providers of IAS and ICS may be required by ComReg to prepare, publish and keep updated, with the aim of giving end-users one easily accessible and comparable place to get information ("one-stop-shop") about the levels of customer service quality offered by

---

<sup>1</sup> As set out in Sections 10 and 12 of the Communications Regulation Act 2002 (as amended) (the Act) Communications Regulation Act, 2002 ([irishstatutebook.ie](http://irishstatutebook.ie)).

<sup>2</sup> [ComReg-ECS-Strategy-Statement-English-Final-for-Web.pdf](#)

<sup>3</sup> By 'customer service' we refer not only to the core customer service elements of handling customer queries, issues and complaints, but more broadly to the non-technical elements making up the service a customer receives from their service provider. These include processes around billing and providing any refunds, communication during any service outages, and the connection, switching and disconnection processes.

<sup>4</sup> For example, see [CCPC-Understanding-Consumer-Detriment-in-Ireland.pdf](#) and [ComReg Consumer Care Statistics Report Q3 2024](#).

<sup>5</sup> [a0423.pdf \(oireachtas.ie\)](#)

## Relevant Service Providers.<sup>6</sup>

- 1.5 On 16 March 2023 ComReg issued a consultation document titled “Proposals for implementing a Customer Charter”<sup>7</sup> (“Consultation 23/14”) which gave interested stakeholders the opportunity to provide their views on ComReg’s proposals for implementing Charters.
- 1.6 Having considered the submissions to Consultation 23/14 (Appendix D), ComReg maintains its preliminary view that it is appropriate to seek to introduce the requirement for a Charter to be prepared, published and kept updated by Relevant Service Providers. This would be aimed at making customer service information available to customers in one easily accessible and comparable place including information as to the levels of customer services quality offered by a provider of IAS and ICS, thereby facilitating transparency.
- 1.7 ComReg proposes to maintain several of its original preliminary views set out in Consultation 23/14. However, having taken account of the views expressed, ComReg has revised some of its preliminary views (and the associated draft Decision Instrument and Schedules are in Appendix A).

## 1.2 Purpose of document

- 1.8 This document and its appendices, contains a Response to Consultation, Further Consultation and Draft Decision (“Further Consultation and Draft Decision”). ComReg is conducting a further consultation on ComReg’s proposals (revised preliminary views) and Draft Decision for a Charter.
- 1.9 The revised preliminary views regarding the proposed introduction of a Charter, which are being further consulted on are set out below. In summary, ComReg proposes:
- that Relevant Service Providers are allowed further flexibility in articulating information relating to quality-of-service levels offered for specified categories of customer service in their Charters (“Commitments”)<sup>8</sup>;
  - revised wording to be used where Relevant Service Providers choose not to

---

<sup>6</sup> ComReg notes the aim of the legislature as clearly stated in the Communications Regulation (Enforcement Bill) Summary Document 2022. [Available here](#)

<sup>7</sup> [Proposals-for-implementing-a-customer-charter.pdf \(comreg.ie\)](#)

<sup>8</sup> As defined in clause 2.5 of the draft Decision Instrument “Commitment” means the (up to date) level of quality of service offered by a Relevant Service Provider (expressed in the form of a percentage within a timeframe defined in accordance with the Data Dictionary) for those Customer Services (being the contact channels response times, query handling resolution times, connecting a new service, refunds processed, and service outages) set out in sections 1-4 of a Relevant Service Provider’s Customer Charter and it is the level of quality of service which the customer expects to get.

offer any Commitments;

- a new ordering of the Charter sections so that sections which contain information on customer service levels offered are brought to the top of Charters giving that information prominence. Charter sections containing general information more usually available to customers on contacting customer care and about a provider's policies in respect of customer service would follow on;
- to change the categories of customer service to be included in the Charter. ComReg proposes to also include an explicit section for refunds, end-user compensation and accessibility, while ComReg proposes to remove categories of customer service on "Disconnections for non-payment of bills" and "Switching";
- that the definition of durable medium does not require Charters to be individually addressed to customers.<sup>9</sup> The time to provide the Charter in a Durable Medium to a Relevant Customer (who is not able to access the Charter from a provider's website), should be within 5 working days of a request;
- that the Commitment period is quarterly, a Relevant Service Provider should publish a Charter containing quarterly Commitments;
- that in respect of measuring and auditing of performance and reporting to ComReg, a Relevant Service Provider may, in lieu of an Audit Statement from an independent Auditor, provide Sign-off by an Officer of the Company (being a director or chief executive officer) which sign-off shall be sent to ComReg at the same time in the form of the ComReg-specified template (Schedule 4).

1.10 ComReg maintains its original preliminary view as set out in Consultation 23/14 that the introduction of a Charter is appropriate and necessary and Relevant Service Providers with a market share of 0.5% or greater will be required to:

- Prepare, publish and keep updated a Charter as specified by ComReg pursuant to section 38 (2) of the 2023 Act, and
- Measure its performance against the Standards<sup>10</sup> set out in its Charter and to report to ComReg on such performance in the form specified in Schedule 3, pursuant to section 38 (4) of the 2023 Act.

---

<sup>9</sup> As defined in clause 2.5 of the draft Decision instrument, Durable Medium means "any instrument which enables a Relevant Customer or a Relevant Service Provider to store information in a way that is accessible for future reference, for a period of time adequate for the purposes of the information, and which allows the unchanged reproduction of the information stored".

<sup>10</sup> As defined in clause 2.5 of the draft Decision instrument, Standard means a Relevant Service Provider's Commitment published in its Charter.

- 1.11 In light of the submissions received and ComReg's revised proposals regarding the articulation of levels of quality of customer service (as per paragraph 1.9 above), ComReg maintains its original preliminary view in Consultation 23/14 on an implementation period of three months, from when the response to consultation and final decision is issued, for providers to provide the Charter.
- 1.12 In Consultation 23/14, ComReg proposed, as part of a phased approach in respect of the Charter, that subsequent to the publication of the Charters it would conduct an adequacy review as to the levels of customer service commitments before deciding whether to specify Minimum Quality of Service Standards. ComReg notes that the Charter consultation process will now focus on achieving transparency and comparability of levels of quality of service for end-users and consumers and not commitments at the individual level. Therefore, ComReg will not conduct the adequacy review of individual commitments. However, ComReg reserves its rights to intervene to establish Minimum Quality of Service Standards subject to consultation, at any time, if it considers it appropriate.
- 1.13 The Appendices are as follows:
- (a) Appendix A contains ComReg's Draft Decision Instrument, including the following Schedules:
    - Schedule 1 Customer Charter Template
    - Schedule 2 Requirements for Completing the Customer Charter Template
    - Schedule 3 The Draft Data Dictionary and Reporting Template, and
    - Schedule 4 Senior Officer sign off template statement.
  - (b) Appendix B contains the Draft Regulatory Impact Assessment.
  - (c) Appendix C contains ComReg's response to the submissions received to Consultation 23/14<sup>11</sup> and
  - (d) Appendix D contains submissions to Consultation 23/14.

## 1.3 Next steps

- 1.14 ComReg invites responses to the questions set out on the Further Consultation and Draft Decision set out in section 3.2 by 5.30pm on 20 February 2025. The procedure

---

<sup>11</sup> Detailing reasons where (i) ComReg's preliminary views have changed having considered the submissions and (ii) ComReg's preliminary views have not changed having considered the submissions.



for submitting responses is set out in Chapter 3.

- 1.15 Following the consultation period, having considered responses to this Further Consultation and Draft Decision, ComReg will publish its response to consultation and final decision.

## 2 Sample Customer Charter

- 2.1 This Chapter sets out a sample Customer Charter and what it would be when completed in line with our proposals as well as a summary of ComReg's rationale for its proposals.



Effective from: 1 April 2025

## Customer Charter

This Charter provides information on the level of quality of customer service we commit to offer you and which you can expect to get from us, any compensation and general information on aspects of our customer service. We are required to provide this Charter by the Commission for Communications Regulation (ComReg). Further information, including what you can use the Charter for, is available at [www.comreg.ie/customercharter](http://www.comreg.ie/customercharter).

This Charter is available to request in PDF by contacting us at [customercharter@samplecompany.ie](mailto:customercharter@samplecompany.ie); 01-000 0000; Customer Services Team, SampleCompany, sample address.

### 1. Contacting us

#### Customer service response times

**Phone:** Freephone - 190X

When you phone us, you can expect that we will answer the following percentage of calls within these timeframes:

	Percentage of calls we commit to answer	Timeframe
i.	90%	1 Minute
ii.	95%	3 minutes
iii.	100%	5 minutes
iv.	-	10 minutes
v.	-	-

**Email:** [contact@samplecompany.ie](mailto:contact@samplecompany.ie)

When you email us, you can expect that we will respond (with a non-automated answer) to the following percentage of emails within these timeframes:

	Percentage of emails we commit to respond to	Timeframe
i.	-	Within 4 hours
ii.	95%	Within 12 hours
iii.	100%	Within 24 hours
iv.	-	Within 48 hours
v.	-	-

**Web form:** [www.samplecompany.ie/contact-support/web-form](http://www.samplecompany.ie/contact-support/web-form)

When you contact us by web form, you can expect that we will respond (with a non-automated answer) to the following percentage of web form submissions within these timeframes:

	Percentage of web form submissions we commit to respond to	Timeframe
i.	95%	Within 4 hours
ii.	100%	Within 12 hours
iii.	-	Within 24 hours
iv.	-	Within 48 hours
v.	-	-

**Web chat:** [www.samplecompany.ie/contact-support/chat](http://www.samplecompany.ie/contact-support/chat)

When you contact us by web chat, you can expect that we will respond to the following percentage of web chat conversations within these timeframes:

	Percentage of web chat conversations we commit to respond to	Timeframe
i.	80%	Within 1 minute
ii.	95%	Within 3 minutes
iii.	-	Within 5 minutes
iv.	-	Within 10 minutes
v.	100%	Within 4 minutes

**Post:** SampleCompany, sample address

When you contact us by post, you can expect that we will respond to the following percentage of letters within these timeframes:

	Percentage of letters we commit to respond to	Timeframe
<b>i.</b>	-	Within 1 day
<b>ii.</b>	90%	Within 3 days
<b>iii.</b>	-	Within 5 days
<b>iv.</b>	100%	Within 10 days
<b>v.</b>	-	-

### Final resolutions

You can expect that we will provide a final resolution to the following percentage of queries, not resolved at the time of the initial contact, within these timeframes:

	Percentage of queries we commit to resolve	Timeframe
<b>i.</b>	-	Within 4 hours
<b>ii.</b>	95%	Within 12 hours
<b>iii.</b>	-	Within 24 hours
<b>iv.</b>	100%	Within 48 hours
<b>v.</b>	-	-

### Contact Channels

**Freephone:** 190X

**Online:** [www.samplecompany.ie/contact-support](http://www.samplecompany.ie/contact-support)

**Email:** [contact@samplecompany.ie](mailto:contact@samplecompany.ie)

**Webform:** [www.samplecompany.ie/contact-support/web-form](http://www.samplecompany.ie/contact-support/web-form)

**Chat:** [www.samplecompany.ie/contact-support/chat](http://www.samplecompany.ie/contact-support/chat)

**Address:** SampleCompany, sample address

## 2. Connecting a new service

### Acknowledgement time for new line connection requests

When you request a new service, where no connection already exists at the premises, you can expect that we will acknowledge the request, confirm whether the order can be processed at this time or not and, if possible, agree a date for an initial appointment to provision the service, for the following percentage of service orders within these timeframes:

Percentage of new line connection requests we commit to acknowledge		Timeframe
i.	-	Within 8 hours
ii.	-	Within 12 hours
iii.	90%	Within 24 hours
iv.	100%	Within 48 hours
v.	-	-

### Existing line connections/activations

When you request a new service, at a premises where a connection already exists, you can expect that we will activate the following percentage of new services within these timeframes:

Percentage of new service requests we commit to activate		Timeframe
i.	-	Within 4 days
ii.	95%	Within 8 days
iii.	100%	Within 10 days
iv.	-	Within 15 days
v.	-	-

### 3. When you are due a refund

#### Time to receive refund

When you are due a refund, you can expect to receive it within these timeframes:

Refund Type	Percentage of refunds processed	Timeframe
<b>Cash Refund</b>		
Electronic Fund Transfer (EFT)	100%	Within 5 days
Cheque	99%	Within 30 days
Other	-	-
<b>Account Credit Refund</b>		
Account Credit	100%	Within 2 days

Customers can choose Electronic Fund Transfer, Cheque or Account Credit as their preferred refund method.

Our refund policy can be accessed at [www.samplecompany.ie/refund-policy](http://www.samplecompany.ie/refund-policy).

### 4. If there is a service outage

#### Planned service outages

When there is a planned network outage, you can expect that we will notify you in advance of the following percentage of outages within these timeframes:

	Percentage of planned network outages we commit to notify you in advance	Timeframe
i.	100%	7 days
ii.	-	5 days
iii.	-	3 days
iv.	-	1 day
v.	-	-

## Unplanned service outages

When there is an unplanned service outage, you can expect information on the outage to be published within these timeframes:

	Percentage of unplanned service outages we commit to inform customers of	Timeframe
i.	95%	2 hours
ii.	100%	4 hours
iii.	-	6 hours
iv.	-	10 hours
v.	-	-

In the event of an unplanned outage, we will inform you through our call centre customer service, in-app, SMS, website and social media channels.

## 5. Compensation

### Mandatory compensation

You can request compensation from us if we fail to meet certain obligations. This section details where compensation schemes are required.

**Switching and porting compensation:** Delays or other issues when switching your broadband service or porting your mobile or landline number may mean you can claim compensation.

We have a switching and porting compensation scheme, which can be accessed at [www.samplecompany.ie/compensation/switchingandporting](http://www.samplecompany.ie/compensation/switchingandporting).

### Other Compensation you can expect from us

Where we fail to meet the customer service expectations as set out in our Charter, you can expect to get compensation as set out below:



Customer service expectations	Compensation if we do not meet customer service expectations
<b>Contact channel response time: Phone</b>	If we fail to meet your expectations on call answering response times, you can expect to get €X.
<b>Contact channel response time: Email</b>	If we fail to meet your expectations on email response times, you can expect to get €X.
<b>Contact channel response time: Webform</b>	If we fail to meet your expectations on webform response times, you can expect to get €X.
<b>Contact channel: Webchat</b>	If we fail to meet your expectations on webchat response times, you can expect to get €X.
<b>Contact channel response time: Post</b>	If we fail to meet your expectations on letter response times, you can expect to get €X.
<b>Query handling resolution time</b>	If we fail to meet your expectations on query handling resolution times, you can expect to get €X.
<b>Connecting a new service: New line connection</b>	If we fail to meet your expectations on connecting a new service, you can expect to get €X.
<b>Connecting a new service: Existing line</b>	If we fail to meet your expectations on activating a new service, where there is an existing line, you can expect to get €X.
<b>Refunds received</b>	If we fail to meet your expectations on the timeframe to receive a refund, you can expect to get €X.
<b>Service outages: Planned</b>	If we fail to meet your expectations on planned service outages, you can expect to get €X.
<b>Service outages: Unplanned</b>	If we fail to meet your expectations on unplanned service outages, you can expect to get €X.

There may be unforeseen circumstances (force majeure) that prevent us from meeting your expectations completely or on time. In such cases, compensation may not be offered.

## **6. Accessibility**

We have an accessibility statement, which can be accessed at:

[www.samplecompany.ie/aboutus/accessibility](http://www.samplecompany.ie/aboutus/accessibility)

## **7. How we will handle complaints**

We will handle any complaints in accordance with our code of practice for complaints handling which you can access at:

[www.samplecompany.ie/consumer/complaints-form](http://www.samplecompany.ie/consumer/complaints-form)

## *8. Any other information*

We value your trust in us. View our SampleCompany [Code of Practice.](#)

SAMPLE

## 2.1 Summary Proposals and Rationale

- 2.2 ComReg remains of the preliminary view that it is necessary, appropriate, proportionate and justified to implement Charter requirements in light of the analysis conducted, including the RIA, and the responses received to Consultation 23/14.
- 2.3 Responses to Consultation 23/14 demonstrated general support for having a Customer Charter. There is an identified lack of transparency of customer service quality in the market and a lack of existing commitments by providers. There is consumer dissatisfaction with overall customer service levels. The revised proposals would help address this.<sup>12</sup> ComReg is of the preliminary view that the costs, time and resources required to implement the proposed Charter requirements are minimised (as the Commitments would be provider set) and justified taking account of the benefits for end-users.
- 2.4 Having a Charter ensures the availability in one place of customer service quality information. This supports the key policy objectives of creating transparency and ultimately driving improvements in customer service quality. Consistent with these objectives, Charters should be as clear and concise as is possible.<sup>13</sup> ComReg's revised proposals take account of submissions received that sought a more focussed approach to transparency. The availability of Charters should facilitate competition and provide greater choice for consumers. Charter requirements complement existing information provision obligations on providers but are separate and distinct from them.
- 2.5 ComReg also maintains the preliminary views consulted upon regarding the scope of application of Charter requirements and the classes of end-users that Charters should address. ComReg has sought to ensure that the regulatory burden of Charter requirements does not have undesirable consequences for smaller providers of ECS and therefore, propose that Charter requirements will be imposed on providers of IAS and number-based ICS, with a market share greater than 0.5%.
- 2.6 Charters will address consumers, microenterprises, small enterprises and not-for-profit organisations. These end-users have less bargaining power than larger enterprises and would likely benefit from greater clarity and commitments as to the level of customer service they can expect from their provider.
- 2.7 ComReg has also allowed greater flexibility to providers in its revised proposals in terms of how they articulate their Commitments, and they are not required to express Commitments at individual customer level. ComReg's revised proposal means that there are various options for how a Relevant Service Provider could articulate and

---

<sup>12</sup> The policy issues were set out in chapter 3 of Consultation 23/14.

<sup>13</sup> ComReg's sample Charter, framed in respect of ComReg's specified form and language requirements, is illustrated above.

tailor such Commitments (if any) to their own specific business operations. ComReg now proposes that a Relevant Service Provider can make Commitment(s) as to the level of quality service it offers (in respect of a specified category of customer service), using a range of different intervals. The specified categories of customer services include contact channels response, query handling resolution, connecting a new service, refunds received, service outage. The level of quality is expressed as a percentage of that customer service the Service Provider offers to deliver within a timeframe for each specified category. This quality-of-service level is the Commitment. It is considered likely that if providers make Commitments to average levels of performance, they will be more ambitious than if making any commitments to minimum levels of performance. ComReg's revised proposals strike a balance between flexibility for providers, transparency and comparability of Charters.<sup>14</sup>

- 2.8 Regarding the form of a Charter, ComReg remains of the preliminary view that having a template Charter form<sup>15</sup> that Relevant Service Providers would fill in according to ComReg specified instructions,<sup>16</sup> using ComReg defined metrics<sup>17</sup> is the approach most likely to ensure consistency and comparability.
- 2.9 ComReg maintains its preliminary view that requirements on a Relevant Service Provider to use a Data Dictionary and Reporting Template when measuring and reporting their performance against Standards in the Charter are necessary, appropriate and proportionate for the reasons set out in Consultation 23/14.<sup>18</sup> However, in light of respondent submissions to Consultation 23/14 (further detail and analysis of which is set out in ComReg's response to a number of comments received to Consultation 23/14, as set out at Appendix C) ComReg has decided to also revise aspects of the Data Dictionary and Reporting Template in order to reflect the changes made to both the Charter Template (Schedule 1) and the requirements for completing that template (Schedule 2).
- 2.10 Considering submissions from respondents<sup>19</sup> that ComReg's proposals for a Charter would not achieve aims of transparency and user friendliness and length, ComReg proposes a reordering of the Charter sections requiring information on Commitments offered to be included at the top of the Charter giving that information prominence. Charter sections containing general information for example, on a provider's policies in respect of customer service, follow after information around Commitment(s) offered.
- 2.11 ComReg has responded to submissions regarding the content of information to be included in a Charter. The focus of the proposed Charter content is on key information

---

<sup>14</sup> See ComReg's analysis in Consultation 23/14, section 3.3 and the RIA.

<sup>15</sup> Pursuant to Schedule 1, Appendix A.

<sup>16</sup> Pursuant to Schedule 2, Appendix A.

<sup>17</sup> Pursuant to Schedule 3, Appendix A.

<sup>18</sup> See ComReg's analysis in Consultation 23/14, section 7.4.

<sup>19</sup> See sections 1.6 and 1.7 of Appendix C.

that customers need and to where there is greatest evidence of poor customer outcomes. Therefore, ComReg is proposing to not include information on some sections such as disconnection and switching, while including information on other sections such as accessibility.<sup>20</sup>

- 2.12 ComReg considers accessibility as a key aspect of customer service. It helps to ensure that all end-users including those with disabilities can effectively engage with their provider and throughout their customer journey. ComReg considers that its revised approach to the Charter form will ensure that end-users benefit in terms of a streamlined, short and easy to read Charter.<sup>21</sup>
- 2.13 The policy aim that the Charter should be as clear and concise as possible, focusing on achieving a 'one-stop-shop' location to get easily accessible and comparable information on Commitments, compensation and general customer care information relating to customer service policies remains valid. ComReg considers that its revised approach achieves the principles<sup>22</sup> that are important in underpinning the proposed requirements for a Charter, namely that a Charter is clear, transparent and comprehensible, so customers can easily navigate and understand the content.
- 2.14 ComReg maintains its preliminary view that Charter Commitments should be provider-led. This approach was supported by a number of respondents to Consultation 23/14. It allows Relevant Service Providers to clearly articulate their customer service commitments to customers, while also enabling ComReg to monitor and evaluate service providers' actual performance in relation to any Charter Commitments they give. Relevant Service Providers can compete on customer service quality and the regulatory burden and cost involved for them is minimised. This approach is considered proportionate and appropriate as the focus of the Charter is on transparency.
- 2.15 ComReg considered responses received to Consultation 23/14 on the issue of how and when a Charter will be updated. More regular updates mean less forecasting for providers and greater agility for them in adjusting Commitments in reaction to experience. This may incentivise competition but involves greater regulatory burden. Against that, and from the end-user's perspective, the more frequently a Charter is revised the more difficult it becomes to track and understand the relevant Commitment. Striking a balance, ComReg proposes that Relevant Service Providers make quarterly Commitments and updates to their Charters.<sup>23</sup>
- 2.16 The Charter is a new regulatory measure, and end-users may not become aware of it in the absence of notification by providers. There was consensus support

---

<sup>20</sup> See Appendix C, sections 1.6, 1.7 and 1.10-1.17.

<sup>21</sup> See ComReg's response to questions 6,7 and 10-17 in Appendix C.

<sup>22</sup> See paragraph 5.27 of Consultation 23/14.

<sup>23</sup> See ComReg's response to question 8 and associated reasoning in Appendix C.

expressed by respondents to Consultation 23/14 on this issue. ComReg considers that it is appropriate to notify all customers about what they can expect relating to customer service. Customers should be notified before they sign a new contract with their provider. This option should place minimal additional burden on providers, given they already send pre-contractual information to customers and the form of communication proposed is that in which providers ordinarily communicate regulatory notifications to their customers. ComReg expects that Relevant Service Providers will notify existing customers, as the proposed Charter notification requirement does not differentiate between new and existing customers.<sup>24</sup> Relevant Service Providers have the flexibility on the means of notifying customers, with the communication that is sent being similar to how providers would ordinarily communicate with their customers as regards regulatory notifications.

- 2.17 Responses to Consultation 23/14 showed there was a common understanding that some form of measuring performance against Charter commitments is necessary. In light of the analysis conducted, ComReg considers such measuring of performance is key to the effectiveness of the Charter and ensuring the accountability of providers. ComReg has had regard to the submissions received on the issue of performance measurement.
- 2.18 On the issue of the costs associated with a recurring mandatory audit requirement,<sup>25</sup> ComReg has sought to mitigate this cost by allowing the option for providers to have sign-off on performance reports by a senior officer of the company (subsequent to the audit of the first performance report). It is proposed that senior officer sign-off is in a prescribed form (Schedule 4) to ensure consistency and comprehensiveness. Accurate reporting ensures customers can trust the measured performance, while safeguarding customers and providers alike.
- 2.19 ComReg remains of the preliminary view that quarterly reporting strikes an appropriate balance between delivering on the transparency objective for the Charter, while being mindful of the ongoing burden on providers.
- 2.20 In summary, ComReg considers that the proposed approach to implementing a Charter would improve the information available to customers on levels of quality of customer service providers offer and act as a one stop for customer service information. It would achieve the transparency objective of the Charter, facilitating effective competition and choice while ensuring the approach is justified and proportionate.

---

<sup>24</sup> See ComReg's response to question 9 and associated reasoning in Appendix C.

<sup>25</sup> See section 1.18 of Appendix C.

## 3 Submitting Responses and Next Steps

### 3.1 Legal Basis

- 3.1 ComReg makes its proposals in this Further Consultation and Draft Decision pursuant to the functions and powers conferred upon ComReg by section 38 of the Communications Regulation and Digital Hub Development Agency (Amendment) Act 2023, as amended (“the 2023 Act”); having had regard to the functions and objectives of ComReg as set out in sections 10 and 12 of the Communications Regulation Act 2002 (as amended); the objectives of the Regulator as set out in Regulation 4 of the European Union (Electronic Communications Code) Regulations 2022 (“the ECC Regulations”)<sup>26</sup> and having regard to the various provisions as set out in Section 1.1 of the draft Decision and Decision Instrument, Appendix A.

### 3.2 We ask the following questions

- Q.1 Do you agree with the proposals in relation to specific Commitments and range of options? Please give reasons for your view and if you disagree provide specific alternative suggestions.
- Q.2 Do you agree with ComReg’s revised preliminary views regarding the proposed specification of the Customer Charter Template, as set out at Appendix A, Schedule 1? Please give reasons for your view and if you disagree provide specific alternative suggestions.
- Q.3 Do you agree with ComReg’s proposed requirements for completing the Charter Template in accordance with Appendix A - Schedule 2? Please give reasons for your view and if you disagree provide specific alternative suggestions.
- Q.4 Do you agree with ComReg’s revised preliminary views regarding the Customer Charter Data Dictionary and Reporting Template, as set out at Appendix A - Schedule 3? Please give reasons for your view and if you disagree provide specific alternative suggestions.
- Q.5 Do you agree with ComReg’s revised preliminary views regarding the length of time a Commitment would be in place without being changed (i.e., the Commitment period) from monthly to quarterly? Please give reasons for your view and if you disagree provide specific alternative suggestions.
- Q.6 Do you agree with ComReg’s revised preliminary views regarding the audit of Performance Reports, Audit Statement and form of senior Sign-off by an Officer

---

<sup>26</sup> S.I. No. 444/2022 - [European Union \(Electronic Communications Code\) Regulations 2022](#)

of the Company – Appendix A – Schedule 4? Please give reasons for your view and if you disagree provide specific alternative suggestions.

- Q.7 Do you agree with ComReg’s revised draft Decision Instrument as set out in Appendix A? Please give reasons for your view and if you disagree, provide specific alternative suggestions.
- Q.8 Do you agree with ComReg’s revised Regulatory Impact Assessment and the revised preliminary conclusions as set out in Appendix B? Please give reasons for your view and if you disagree, provide specific alternative suggestions giving details to support your view, particularly with respect to the benefits and costs identified, including any evidence to support quantifying such benefits and costs.

3.2 It is requested that comments within submissions reference the relevant question numbers from this document.

### **3.3 Response Timeframe**

3.3 The timeframe for receipt of submissions to this Further Consultation and Draft Decision is 5.30pm on 20 February 2025, during which time ComReg welcomes written responses on any of the issues raised in this document.

### **3.4 Confidential Information**

3.4 To promote further openness and transparency, ComReg will publish all respondents’ submissions to this further consultation, subject to the provisions of ComReg’s Guidelines on the Treatment of Confidential Information – ComReg Document No. 05/24.

3.5 Respondents are requested to clearly identify confidential material and provide a confidential and non-confidential version of its responses. Respondents are also requested to provide any electronic submissions in an unprotected format so that they can be appended into ComReg’s submissions document for electronic publication.

### **3.5 Responses To**

3.6 Responses must be submitted in written form (post or email) to the following address/email and clearly marked “Submission to ComReg 25/05”:

Commission for Communications Regulation  
Retail Policy  
One Dockland Central,  
1 Guild St.,



North Dock,  
Dublin 1  
D01 E4XO  
Ireland  
Email: [RetailConsult@comreg.ie](mailto:RetailConsult@comreg.ie)

- 3.7 If interested parties require any clarification or have any questions on the further consultation, please contact ComReg by email using the above address.

### **3.6 Next Steps**

- 3.8 Having considered all responses to this Further Consultation and Draft Decision, ComReg will publish its Response to Consultation and Decision.