



An Coimisiún um
Rialáil Cumarsáide

Commission for
Communications Regulation



Electronic Communications Summary Strategy Statement 2023 to 2025

Introduction

The Commission for Communications Regulation (ComReg) is the statutory body responsible for the regulation of the electronic communications sector and the postal sector in Ireland.

While the role of regulation has changed over the last 20 years, the basic tenet of regulation remains the same – to facilitate competition principally through the regulation of network access where bottlenecks exist, to protect consumers and to encourage innovation in the electronic communications sector. Providing regulatory certainty and consistency helps

ensure the right incentives to invest exist. ComReg’s role therefore involves dealing with complex issues of law, economics, and technology, and ensuring that decisions are timely, taken fairly and are clearly explained.

This summary document sets out ComReg’s vision for the electronic communications sector, defines our strategic intents for the coming years and identifies sectoral trends and challenges we anticipate will influence our activities over the coming period.

Vision, Role and Mission

ComReg’s vision for the communications sector

Consumers and businesses in Ireland have affordable, high-quality, and widespread access to secure communications services and applications that support their social and economic needs.

ComReg’s Role

To ensure that communications markets operate in the interests of end-users and society.

ComReg’s Mission

Through effective and relevant regulation, we facilitate the development of a competitive communications sector in Ireland that attracts investment, encourages innovation and empowers consumers to choose and use communications services with confidence.

Trends and Challenges

The electronic communications sector plays a vital role in supporting consumers and businesses to live, work and communicate. Over the coming decade, wider social, economic, legislative and technological forces will influence the development of the electronic communications sector. ComReg has identified a number of trends which are likely to shape the sector, and which may pose regulatory challenges in the coming period:

Enhanced Connectivity & New Technologies:

Investment in commercial networks, the National Broadband Plan and 5G technologies will play an increasingly important role over the next decade.

Network Demand, Network Security

and Resilience: The demand on electronic communications networks has grown considerably as more people work remotely. Issues around network security, integrity and resilience are expected to grow in importance as end-users become more reliant on electronic communications.

Consumer Experience: Consumer use and adoption of electronic communications and associated technologies will continue to evolve as networks and service become available, however consumer experience will not be uniform across all consumer types or geographic areas.

The Evolution of Adjacent and Related Markets:

The evolution of related markets, including input markets (e.g. equipment), complementary markets (e.g. mobile handsets) and downstream markets will shape the adoption, use and experience of electronic communications.

Digitalisation will continue as consumers are become more reliant on electronic communications, online/digital services and online platforms.

Sustainability in the electronic communications sector can play an important role in creating a more sustainable economy. The carbon footprint of the sector is also changing as new networks get deployed.

The Changing Future of Regulation in the Sector:

The European Electronic Communications Code and other legislative changes/proposal will impact the way ComReg regulates the electronic communications sector and potentially the scope of our role and remit.

Strategic Intents

The tools available to ComReg to deliver on its mandate and vision for the sector derive from its regulatory powers. For each area within our role, we have developed a statement of strategic intent and goals that support the strategic intent.

ComReg's Strategic Intents

| | |
|---|---|
| 1: Competition & Investment | A competitive sector that delivers efficient investment, innovation, and choice |
| 2: Consumer Protection | Consumers can choose and use electronic communications services with confidence |
| 3: Connectivity & Network Resilience | End-Users have widespread access to high-quality and secure communications networks, services, and applications |
| 4: Compliance & Enforcement | Regulated entities comply with regulatory requirements |
| 5: ComReg's Organisation | We are an effective, agile, and relevant regulator |

1. Competition & Investment

The electronic communications sector in Ireland is a competitive sector that delivers efficient investment, innovation and choice.

Our guiding principle is that where competition is sustainable, markets deliver optimal outcomes in terms of investment and price, quality, choice and innovation, ultimately to the benefit of consumers.

Figure 1: Regulation enables Competition and Investment:



Strategic Intent 1:

Competition & Investment goals

| | |
|-----------------|--|
| Goal 1.1 | There is effective and sustainable competition in retail Electronic Communications Networks (ECN) / Electronic Communications Services (ECS) markets. |
| Goal 1.2 | There is effective and sustainable competition as far as is possible in wholesale markets, in the light of persistent bottlenecks and barriers to entry. |
| Goal 1.3 | Sustainable and effective competition can allow for the timely withdrawal of regulation. |
| Goal 1.4 | Competitive incentives facilitate efficient investment in existing and new infrastructure and services to the widest extent possible. |
| Goal 1.5 | Regulatory certainty on wholesale pricing and the rate of return, facilitates timely investment decisions. |
| Goal 1.6 | The management of spectrum and numbers facilitates competition, enhances connectivity and promotes efficient investment. |

2. Consumer Protection

Consumers can choose and use electronic communications services with confidence.

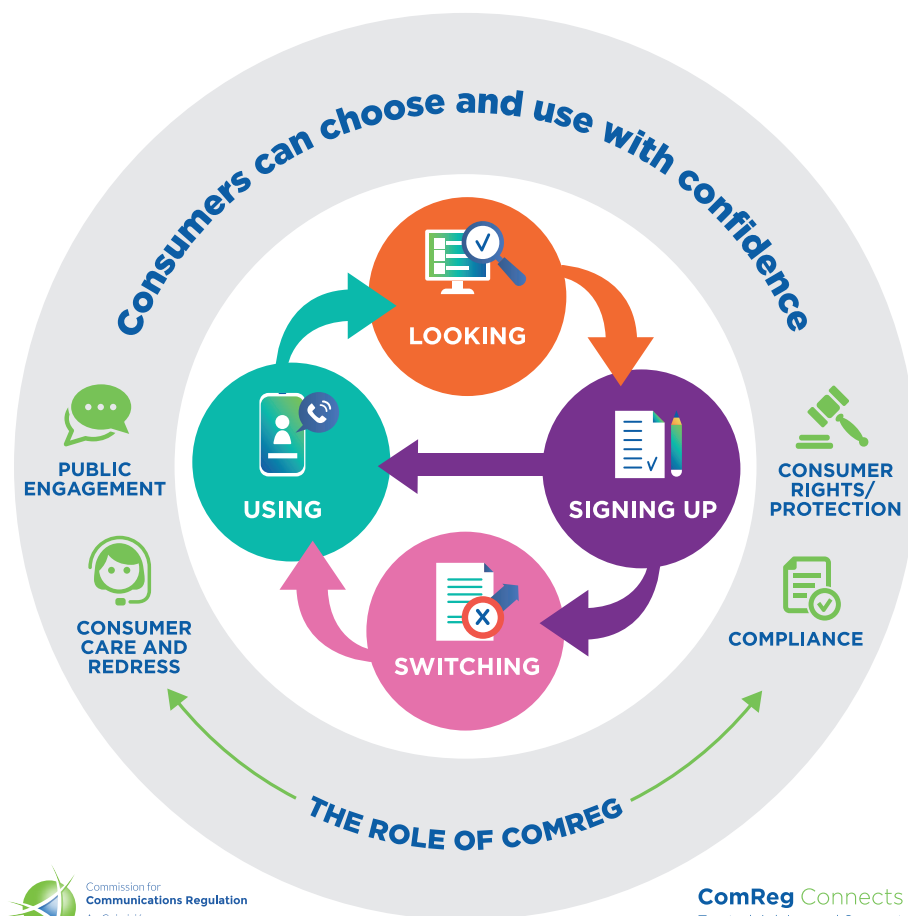
Consumer Protection involves setting rules to ensure that consumers can access basic services and that they are armed with the information they need to engage with the market with confidence.

ComReg describes the consumer navigation of the market, or the “Consumer Journey”, in four broad phases, shown in the figure below:

1. Looking
2. Signing
3. Using
4. Switching

ComReg’s objective is to ensure that consumers are protected through every stage of the Consumer Journey and to achieve this ComReg uses its regulatory toolbox to intervene and assist consumers as issues arise and more generally where it identifies actual or potential consumer harm issues. Where relevant, specific consumer harms are highlighted and addressed through ComReg’s various powers and work streams.

Figure 2: The customer Journey



Strategic Intent 2:**Consumer protection goals**

| | |
|-----------------|--|
| Goal 2.1 | ComReg identifies and understands consumer harms. |
| Goal 2.2 | Consumer rights and protections, including for vulnerable and disabled consumers, are adequate to mitigate consumer harm. |
| Goal 2.3 | Consumers, including vulnerable and disabled end-users, are supported by clear, accurate and up to date information throughout the Consumer Journey. |
| Goal 2.4 | There are low barriers to consumers exercising their choice when signing up for a service. |
| Goal 2.5 | Consumer rights throughout their journey are upheld by their service providers. |
| Goal 2.6 | There are low barriers to consumers exercising their choice when leaving a contract. |
| Goal 2.7 | All end-users have affordable access to adequate broadband and voice services at a fixed location. |
| Goal 2.8 | Consumers have effective redress mechanisms, including access to timely query and complaints handling processes. |
| Goal 2.9 | ComReg is an effective advocate for consumers. |

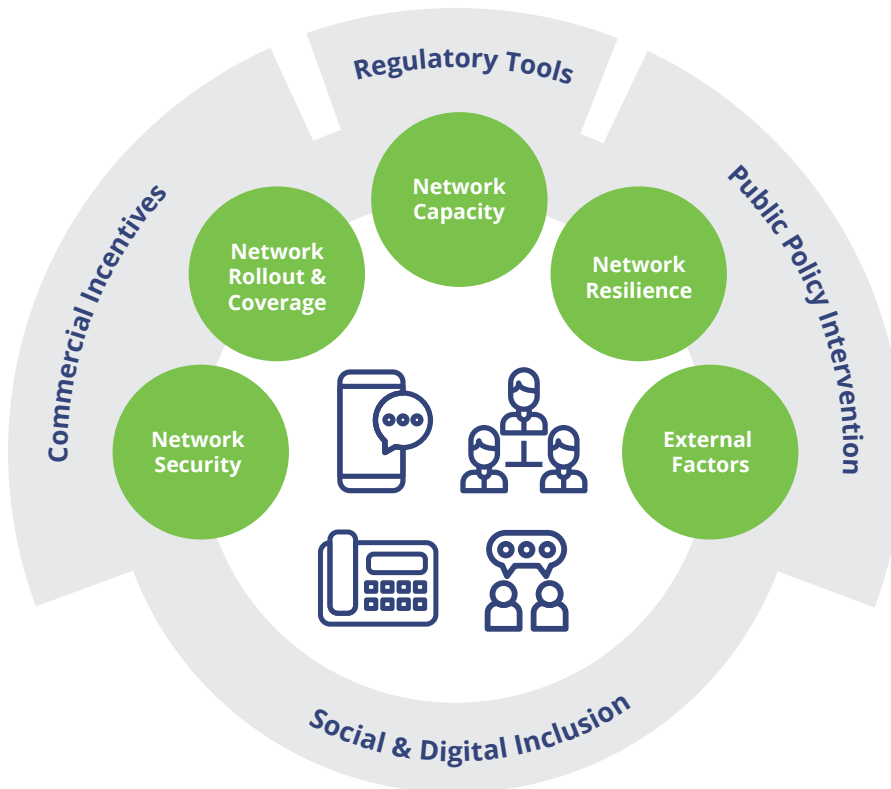
3. Connectivity & Network Resilience

End-users have widespread access to high-quality and secure communications networks, services and applications.

As our reliance on electronic communications has grown, we have also become more dependent and reliant on the proper functioning of our electronic communications.

ComReg’s role in this area is to have a holistic understanding of connectivity deficits and network security and resilience issues facing the country, to use the regulatory tools available to us to address these deficits and to support others (e.g. State Aid intervention) who have relevant tools as a knowledgeable and informed regulator.

Figure 3: Strategic Framework



Strategic Intent 3: Connectivity & Network resilience goals

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|-----------------|---|
| Goal 3.1 | Telecommunications networks, technologies and solutions allow end-users to fully participate in all aspects of society. |
| Goal 3.2 | Utilising the regulatory tool kit, ComReg’s activities promote connectivity and/or incentivise infrastructure rollout. |
| Goal 3.3 | Operators have appropriate risk-based procedures in place to manage network security and resilience. |

4. Compliance and Enforcement

Regulated entities comply with regulatory requirements

ComReg's view is that a strong and effective deterrence regime and regulatory powers helps develop a positive culture of compliance within the electronic communications sector.

We continuously monitor the application of regulatory obligations to ensure markets develop properly and seek to take targeted enforcement action in a way that maximises the effectiveness of the regulatory regime.

Figure 4: Optimal Enforcement



Strategic Intent 4:

Compliance & Enforcement goals

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|-----------------|---|
| Goal 4.1 | Regulated entities are proactive in ensuring their own compliance. |
| Goal 4.2 | ComReg's compliance and enforcement activities are conducted using fair and objective processes and are targeted and prioritised appropriately. |
| Goal 4.3 | ComReg has an effective set of powers to incentivise compliance and effectively monitor and enforce. |

5. ComReg’s Organisation

We are an effective, agile and relevant regulator.

To enable us to undertake our role and adapt to the changing expectations, we must continue to ensure that we are an effective, agile and relevant regulator. We do this through being a well-informed regulator, utilising high-quality data and the best-practice analytical techniques to inform our regulatory decisions.

Our organisation is staffed by skilled experts whose work is underpinned by efficient organisational processes and a mandate that meets the needs of the sector.

Figure 5: Ensuring Effective and Relevant Regulation



Strategic Intent 5:

ComReg’s Organisational goals

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|-----------------|--|
| Goal 5.1 | ComReg has a deep understanding of the markets ComReg regulates and related markets. |
| Goal 5.2 | The regular and timely delivery of reliable and accurate data supports robust evidence-based decision-making, effective market monitoring and informed action. |
| Goal 5.3 | ComReg is proactive on engagement with a range of stakeholders. |
| Goal 5.4 | ComReg contributes to and learns from international best practice. |
| Goal 5.5 | ComReg actively engages with the evolution of the market, including adjacent and related markets, and ensures the legislative mandate evolves to enable ComReg to deliver effectively. |
| Goal 5.6 | ComReg maintains an agile, skilled and motivated organisation. |
| Goal 5.7 | All end-users have affordable access to adequate broadband and voice services at a fixed location. |
| Goal 5.8 | In line with best practice, ComReg has efficient and effective policies, processes and systems. |

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