



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

# Emergency Call Answering Service

## Call Handling Fee Review for 2025-2026

### Consultation

**Reference:** ComReg 24/84  
**Version:** Final  
**Date:** 22/10/2024

## 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.

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## Chapter 1

# 1 Introduction

- 1.1 In Ireland, emergency services are called by dialling 999 or 112, and such calls are initially received by the Emergency Call Answering Service ("ECAS").
- 1.2 In accordance with relevant Irish legislation<sup>1</sup>, emergency calls are free of charge to the caller on all networks.
- 1.3 On 12 February 2018, the Minister for Communications, Climate Action and Environment<sup>2</sup> ("the Minister") awarded a contract to BT Communications Ireland Ltd ("BT") with respect to the ECAS. This contract known as "the Agreement" is between the two parties alone.
- 1.4 The ECAS is funded entirely through the Call Handling Fee ("CHF"). This is a fee payable by the presenting Electronic Communications Network ("ECN") operator and/or the Electronic Communication Service ("ECS") provider whenever their customers make an emergency call to the ECAS.
- 1.5 ComReg is required to annually review the maximum CHF that may be charged by the ECAS operator<sup>3</sup>.
- 1.6 The following table shows the CHF applicable in each year since the signing of the Agreement:

Period	CHF	Document
Up to 2020	€3.93	Agreement between the Minister and BT
2020/2021	€1.77	ComReg Document No. 20/03
2021/2022	€2.83	ComReg Document No. 21/02
2022/2023	€2.98	ComReg Document No. 22/01

<sup>1</sup> Regulation 93(1) of S.I. No. 444 of 2022 European Union (Electronic Communications Code) Regulations 2022

<sup>2</sup> The Department of Communications, Climate Action and Environment (DCCA) became the Department of Environment, Climate and Communications ("DECC") in September 2020.

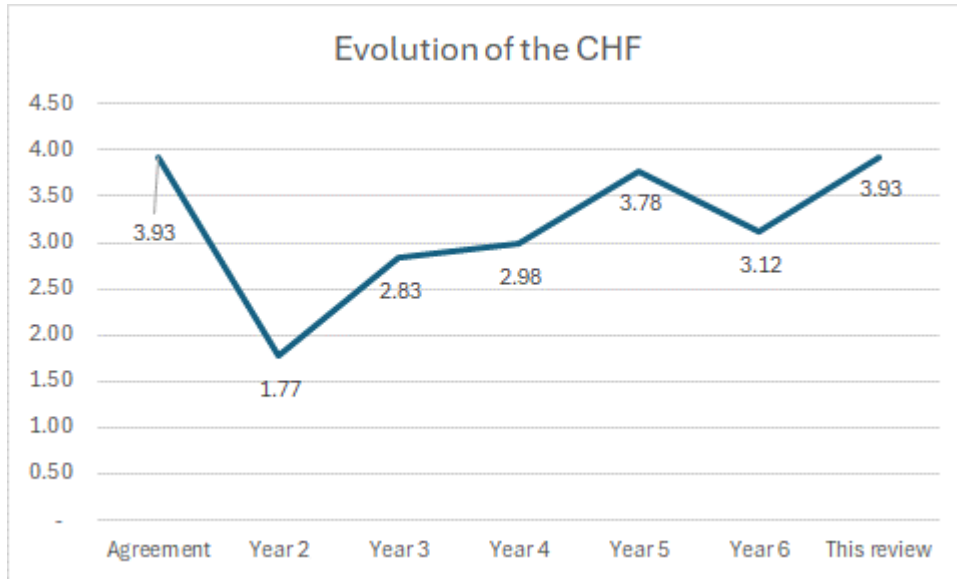
<sup>3</sup> Section 58(D)(I) of the Communications Regulation Act, 2002, as amended ("the Act")

2023/2024	€3.78	ComReg Document No. 23/05
2024/2025	€3.12	ComReg Document No. 24/03

- 1.7 This consultation by ComReg concerns the maximum chargeable CHF applicable from 12 February 2025 to 11 February 2026, the latter date being the eighth anniversary of the date on which the Agreement was entered into, in accordance with Section 58D(1) of the Act.
- 1.8 As previously advised,<sup>4</sup> the current ECAS contract is due to expire in November 2025. DECC has the option to extend the existing services with BT for up to 24 months until November 2027. Due to developments during the recently cancelled public procurement process for the next ECAS operator, DECC has advised ComReg that the option to extend services will be required to provide sufficient time to procure and transition a new operator for ECAS.
- 1.9 This extension means that, in addition to the current CHF calculation, ComReg will carry out further CHF determinations, pursuant to the Act, in 2025 and 2026.
- 1.10 The cost base of the ECAS has been assessed by ComReg for this purpose. During the review, an assessment was also undertaken of reasonable costs. ComReg has been assisted by its consultants, Analysys Mason, in carrying out its review (See ComReg Document 24/84a).
- 1.11 Based on detailed analysis of current monthly call volumes ComReg expects volumes to be circa 2.2m calls in the coming year. Underlying call volumes are driven by population increase and economic activity. However, there has been an unusual decrease in call volumes within the review period which is discussed further in Chapter 4 and in the consultant's report. Predicted call volumes are a key input to the CHF.
- 1.12 Having concluded its analysis of reasonable costs and forecast call volumes, as set out below, ComReg proposes that the CHF to be applied from 12 February 2025 ("2025 CHF") will be **€3.93**. This proposed CHF will run to 11 February 2026.
- 1.13 The proposed CHF of €3.93 is the same value as the original CHF of €3.93 contained in the Agreement.
- 1.14 The evolution of the CHF from the Agreement to now is as follows:

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<sup>4</sup> ComReg 23/101



**Figure 1: Evolution of the CHF**

- 1.15 ComReg is required to complete its review by 12 December 2024. If, by that date, it appears that the expected rate of call annual volumes will differ from the current forecast of 2.2m calls ComReg may further adjust the CHF calculation accordingly.
- 1.16 ComReg may publish responses to this consultation in due course in accordance with its policy. Respondents are therefore asked to provide confidential and non-confidential versions of any document in respect of which any confidentiality is claimed (e.g. commercially sensitive information). In this respect, please see ComReg's Consultation Procedure Guidelines (ComReg 24/04)<sup>5</sup> and Guidelines on the Treatment of Confidential Information (ComReg 05/24<sup>6</sup>).

<sup>5</sup> <https://www.comreg.ie/publication/consultation-procedure-guidelines>

<sup>6</sup> [Microsoft Word - Document in Microsoft Internet Explorer](#)

## Chapter 2

# 2 Movement in the proposed CHF

2.1 The following are the significant movements in the proposed CHF.

<b>2024 CHF</b>	<b>€3.12</b>
Increase in operating costs	€✂
Variation in call volumes – the Android issue	€✂
Depreciation	€✂
<b>2025 CHF</b>	<b>€3.93</b>

### Increase in operating costs

2.2 There has been an increase in operating costs mainly due to pay scale adjustments for call centre operators.

### Variations in call volumes - the Android issue

2.3 The likely extension of the term by two years prolongs the period over which costs are recovered. Prior to BT withdrawing from the procurement process for the ECAS the CHF set by this consultation would have been in place from February 2025 to November 2025. However, because call volumes had been significantly lower than anticipated there was a significant under recovery of costs.

2.4 Absent extension of the term, BT estimates that, because of this under recovery, the CHF for the coming year would have been €4.92 mainly due to the lower call volumes.

2.5 As ComReg noted in last year's consultation, late 2022 and early 2023 saw a significant increase in ECAS call volumes. At that time, ComReg stated that it understood the increase was caused by a software issue on certain Android phones<sup>7</sup> and that updates had been developed by manufacturers to address this. ComReg observed that the issue was not unique to Ireland and had been seen in other jurisdictions.

<sup>7</sup> <https://eena.org/knowledge-hub/news/false-calls-originating-from-android-devices-acknowledged-by-handset-operators/>

- 2.6 The deployment speed of the “fix” for the Android issue was much faster than anticipated. Fewer affected phones than anticipated meant that call rates were below those forecast and thus there were lower revenues. In short, the CHF for 2024/2025 was, with hindsight, too low to cover the ECAS costs.
- 2.7 Without the extension of the term, the under recovery would have had to be recovered over circa nine months or circa 1.65m calls. With a 24 month extension, this recovery period is extended and the under recovery is now spread over circa 6m calls.

## Depreciation

- 2.8 The change in depreciation reflects two issues. Firstly, with a 24 month extension of the term assets which were due to be fully written off by November 2025 now have their asset lives extended by a further two years, thereby lowering the depreciation charge. Secondly NG eCall<sup>8</sup>, which is an EU requirement that needs to be developed and introduced by 01 Jan 2026 (which falls into the extension period) and the cost of which is being written off over the extended life of the contract. DECC, which has mandated the implementation of NG eCall in accordance with legislative requirements, has requested that it be funded through the CHF rather than the sinking fund.

## Sinking Fund contribution

- 2.9 DECC does not propose to release any funds from the Sinking Fund as part of the current review. The use of the Sinking Fund is at the sole discretion of DECC.
- 2.10 In previous reviews DECC has released c. €1.5m from the Sinking Fund. This has been done in two ways:
- A reduction in the CHF through a direct offset against costs incurred by BT in running the ECAS.
  - The direct funding of certain capital expenditure rather than depreciating the asset through the CHF.
- 2.11 Almost all Sinking Fund contributions made during ECAS (II) have been returned via these two mechanisms.
- 2.12 ComReg understands that DECC is not returning further contributions as it considers it more appropriate to retain funds for the transition from ECAS (II) to a future ECAS (III) and from BT to the new ECAS operator.

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<sup>8</sup> Next Generation eCall is an evolution of the existing eCall service that is based on IMS using 4G/5G technology. With NG eCall, the IMS emergency call, as specified in 3GPP Release-14, is used. See [here](#) for further information. See also Commission Delegated Regulation (EU) 2024/1084



## Impact on cost recovery model

- 2.13 The ECAS is largely a fixed cost entity. The capital infrastructure and many of the operating costs are fixed in nature and have been implemented in accordance with the Agreement. While the number of call centre operators can vary depending on the volume of calls, BT is required to maintain a minimum level in order to adhere to Key Performance Indicators as set out in the Agreement. Thus, the decreased call volumes did not significantly vary the running costs.
- 2.14 The decrease in call volumes exerts upward pressure on the CHF although this is significantly offset by the term extension.

## Monitoring Costs

- 2.15 ComReg can confirm that its monitoring costs<sup>9</sup> associated with the carrying out of this review are not, at this time, being recovered through the CHF.

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<sup>9</sup> Section 58 (E) of the Act

## Chapter 3

# 3 Reasonable Costs

- 3.1 As part of this review ComReg has reviewed the costs incurred by BT under the Agreement to determine whether or not they could be considered reasonable. In conducting its review ComReg, with the support of its advisors Analysys Mason, has had extensive interaction with BT.
- 3.2 As in previous years, ComReg has visited the two call centres in Ballyshannon and Navan. In addition, ComReg visited the standby facility in Clonsaugh.

## Comparison of 2025 CHF costs with 2024 CHF costs

- 3.3 ComReg has compared the ongoing costs as estimated by BT to the end of the term compared to the costs from the 2024 CHF review. The variances are discussed in further detail below.

Cost Categories	€'000
2024 CHF review – Ongoing costs <sup>10</sup>	€3<
Salary costs	€3<
Depreciation	€3<
Other cost categories	€3<
Total cost movement	€3<
2025 CHF review - Ongoing costs	€3<

- 3.4 Total running costs of the ECAS from the 2025 CHF review are expected to be €3< compared to costs in the 2024 CHF review of €3<. These costs include depreciation and exclude the sinking fund. This represents an increase of circa €3< on the prior review.
- 3.5 These movements are discussed below.

<sup>10</sup> Including depreciation

## Salary costs

- 3.6 There has been an increase in salary costs between the 2024 CHF and the 2025 CHF. This includes adjustments to certain pay rates and allowances amongst staff.
- 3.7 While reduced calls per annum are forecast for the coming period, this will not have a linear relationship with staffing requirements as the ECAS is required to maintain certain minimum staffing levels regardless of call volumes.

## Depreciation

- 3.8 The change in depreciation reflects the fact that assets that were due to be fully written off by November 2025 now have their asset lives extended by a further two years together with the additional depreciation associated with NG eCall.

## All other costs

- 3.9 There has been minor variations in all other cost categories.
- 3.10 For example, cleaning costs continue to decline. In the initial period post Covid 19 these were forecast to be higher than are now being incurred. On the other hand certain licence fees and support costs are now being renewed to cover the extended period and these have resulted in a slight increase in costs.
- 3.11 In reviewing the various cost categories ComReg has considered whether or not the costs are reasonable. In certain cases, during this review, it has excluded some costs, which have tended to be relatively immaterial with minimal impact on the CHF, pending further information and clarification from BT. These have related to:
- the inclusion, by BT, of operating costs for certain capital projects which have not yet gone live; and
  - the cost of some licence renewals which are greater than those included in the original budget.
- 3.12 ComReg is of the preliminary view that the remaining costs incurred by the ECAS are reasonable.

## Impact of extension of term

- 3.13 It should be noted that while certain cost categories have risen, no additional costs have been added to the CHF in anticipation of the move from ECAS (II) to a future ECAS (III) or with the transition from BT to a new ECAS operator. The costs in the CHF model reflect those of the ECAS under “business as usual” circumstances.

## Chapter 4

# 4 Volumes

4.1 As discussed above, annual volumes to September 2024 are currently circa 2.2m per annum, (down from the previous forecast of 2.4m calls) and the movement in actual calls is reflected in Figure 24 below:



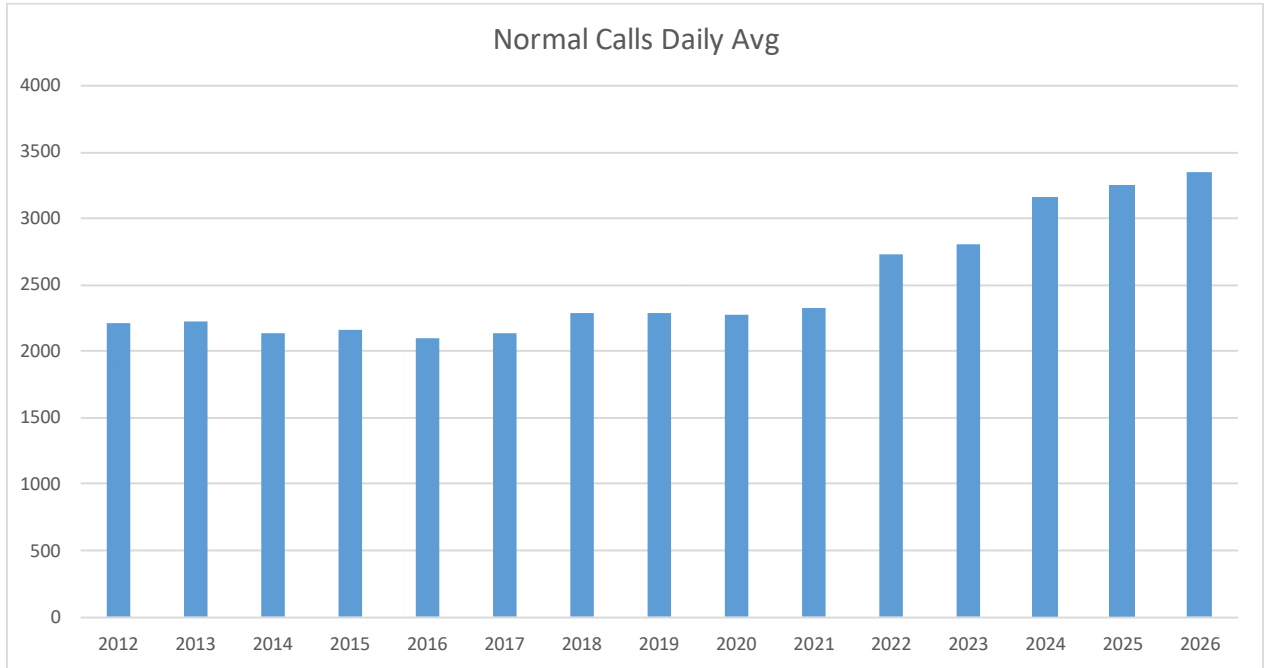
**Figure 2: ECAS monthly call volumes July 2010 to September 2024**

Source: BT

4.2 This includes all call categories:

- Normal – calls are connected to an emergency service.
- Noisy – calls are generated from technical faults, mainly on fixed line networks.
- Abandoned – calls of an extremely short duration to the extent that the call operator does not have time to interact with the call.
- Silent – Calls, while reaching an operator, have often been dialled in error. Examples of this are pocket dials or more recently the issue referred to in paragraph 2.3.
- Other – this covers several categories such as test calls.

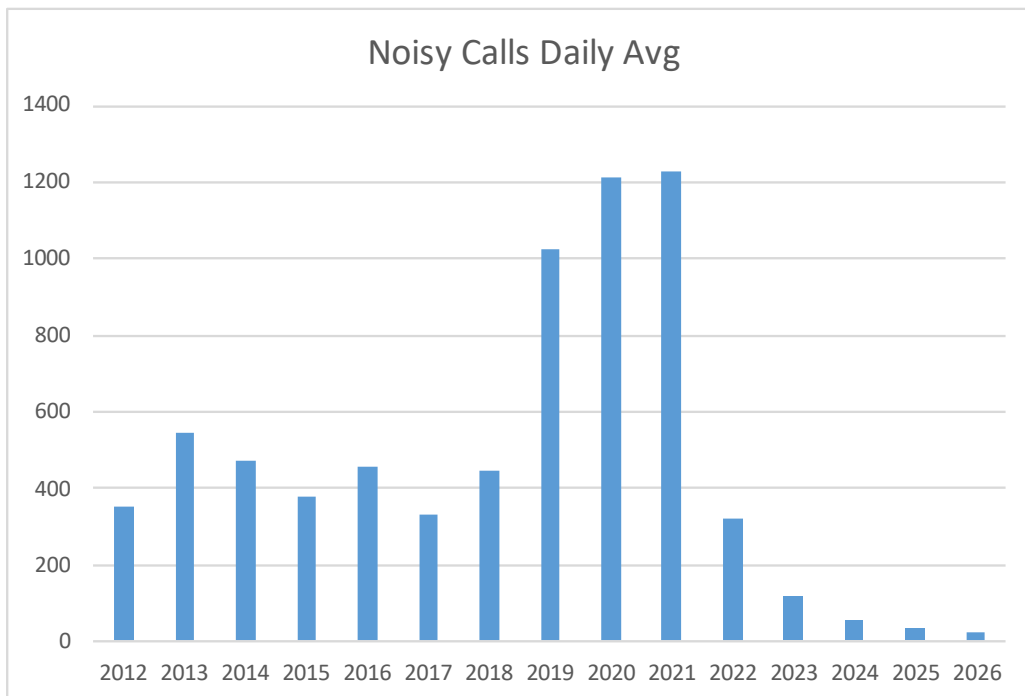
4.3 The following are graphical representations of these categories since 2012 and their projection to 2026.



**Figure 3: Normal calls**

Source: BT

4.4 Normal calls have shown a general upward trend in line with economic activity and population growth.



**Figure 4: Noisy Calls**

4.5 ComReg understands that the reduction in noisy calls is as a result of migration from copper.

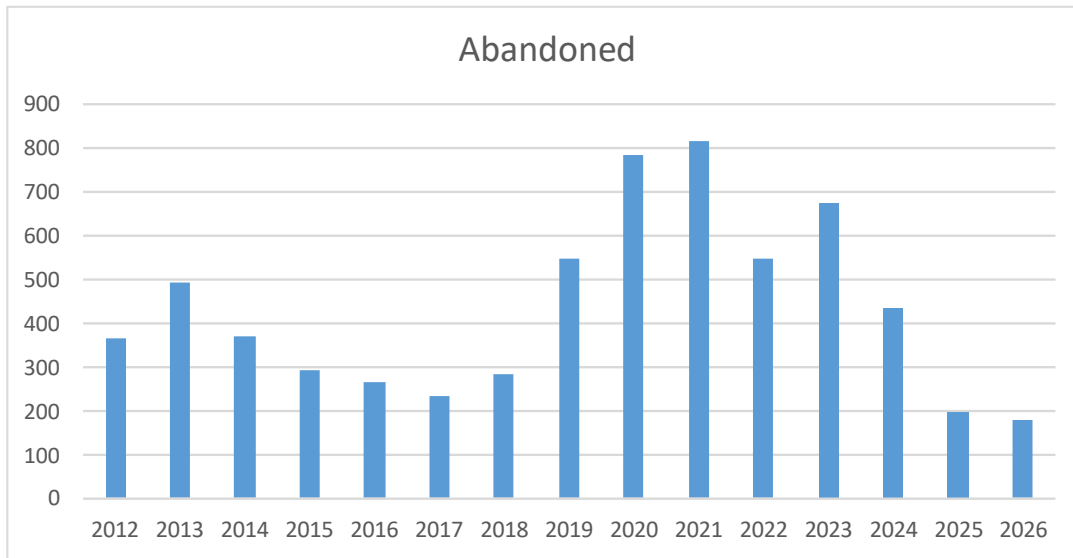


Figure 5: Abandoned calls

4.6 Abandoned calls tend to reflect the overall number of calls presented to the ECAS.

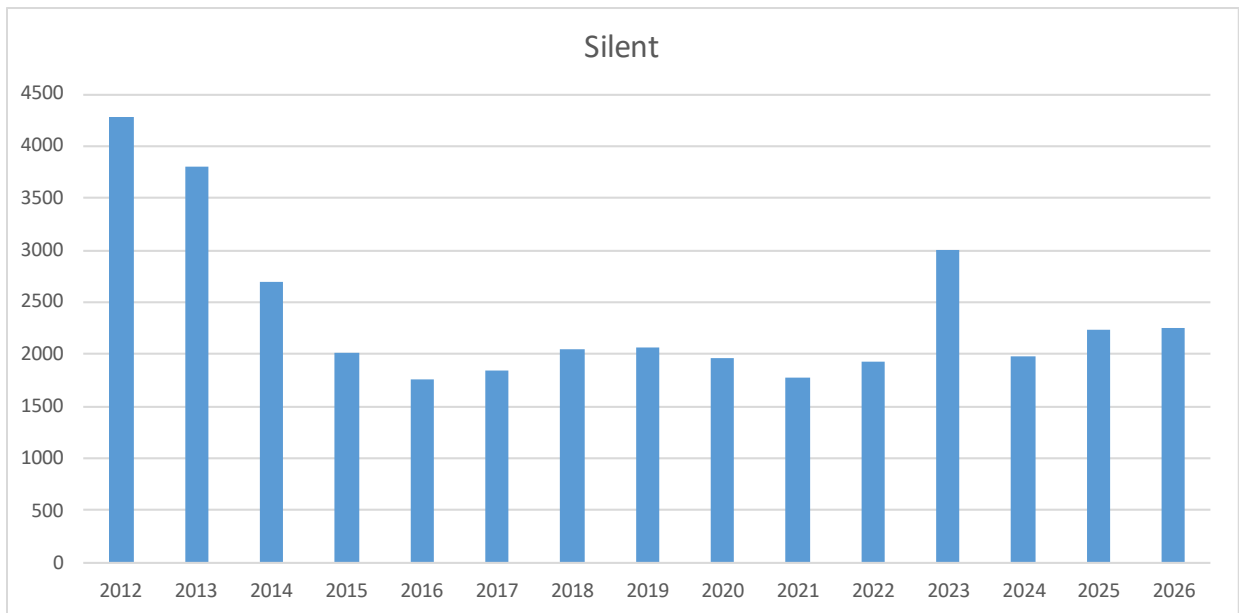
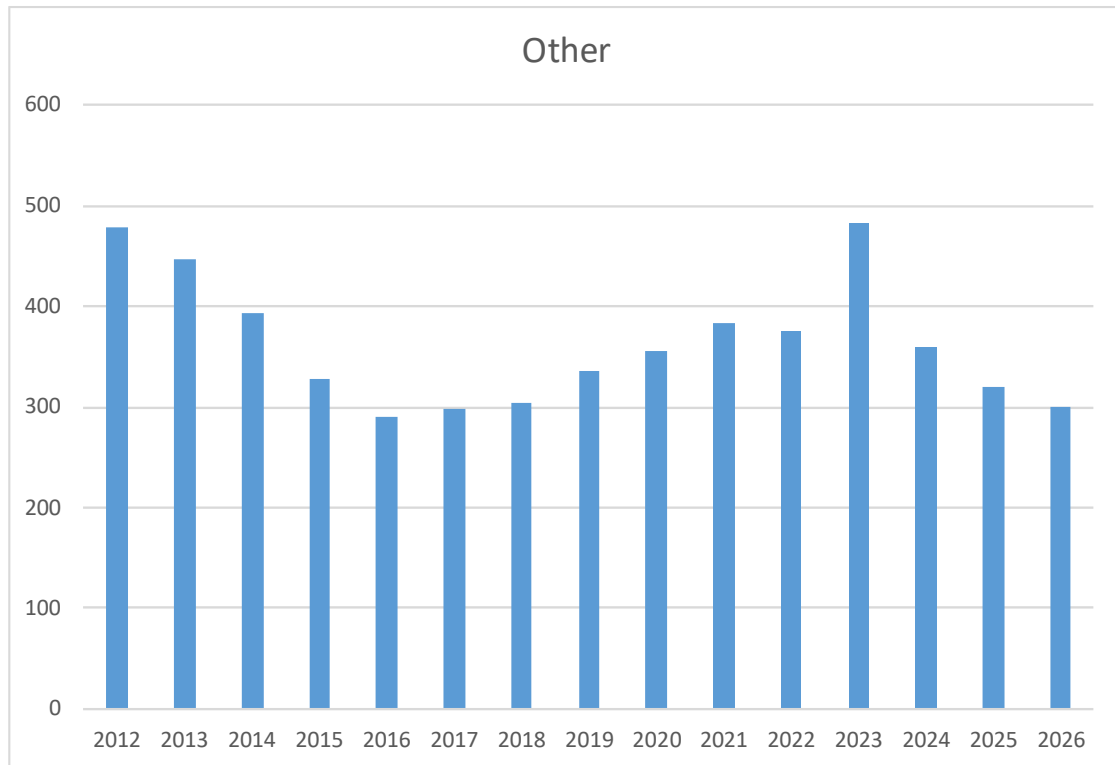


Figure 6: Silent calls

4.7 Silent calls tend to correlate with normal calls, although there was a significant increase in 2023 associated with the software issue on Android handsets.



**Figure 7: Other calls**

4.8 ComReg is of the preliminary view that annual call volumes will be circa 2.2m per annum. In summary and as noted above there have been movements between 2023/2024 and the forecast for 2024/2025:

- Normal – increase due to population growth and economic activity.
- Noisy – decline in faults on fixed line networks and migration from copper
- Abandoned – similar to previous periods.
- Silent – while also similar to previous periods, recent software issues having been largely resolved, there is greater stability in this category.
- Other – similar to previous periods. The level in this category is very low.

4.9 ComReg publishes regular information notices on ECAS call volumes. Figure 8 below (which is taken from ComReg Information Notice No. 24/63) shows the differences in monthly call volumes between January 2024 and June 2024 when compared to the same period in 2023.

**Table 1: Call volumes January 2023 to June 2023 v January 2024 to June 2024**

	<b>2023</b>	<b>2024</b>	<b>difference</b>	<b>% difference</b>
January	192,714	177,025	-15,689	-8.1%
February	185,739	171,065	-14,674	-7.9%
March	214,741	185,058	-29,683	-13.8%
April	210,088	171,599	-38,489	-18.3%
May	243,886	187,862	-56,024	-23.0%
June	255,604	180,893	-74,711	-29.2%
<b>January to June Total</b>	<b>1,302,772</b>	<b>1,073,502</b>	<b>-229,270</b>	<b>-16.7%</b>

Source: BT

4.10 Between January 2023 to June 2023 calls increased by circa 238,000 and then between January 2024 to June 2024 they decreased by circa 230,000, the net effect being a variation of circa 8,000 calls between the two periods.

4.11 Call volumes for July to September 2023 compared to July to September 2024 were:

**Table 2: Call volumes July to September 2024 v July to September 2023**

	<b>2023</b>	<b>2024</b>	<b>Difference</b>	<b>% Difference</b>
July	207,563	185,651	-21,912	-10.6%
August	205,960	192,628	-13,332	-6.5%
September	195,488	179,339	-16,149	-8.2%
<b>July to September Total</b>	<b>609,011</b>	<b>557,618</b>	<b>-51,393</b>	<b>-8.4%</b>

Source: BT

4.12 Given the unpredictability of call volumes (and their bursty nature) there can be significant variations month-on-month. BT, through its analysis of the different call types, has predicted that there will be annual call volumes of circa 2,200,000 for the 2025 CHF. This is a decrease of circa 200,000 forecast calls per annum from



ComReg Document No. 23/05.

- 4.13 ComReg is of the preliminary view that it is prudent to reduce the forecast call volume to 2,200,000 (2.2m) calls for the 2025 CHF and beyond.
- 4.14 ComReg welcomes the views of respondents regarding volume predictions.

Q. 1 Please provide any comments you may have in relation to forecast call volumes for the 2025 CHF. Please provide detailed reasoning and accompanying calculations (where appropriate) supporting your submission.

Q. 2 Are there any matters which you wish to raise as part of this review? Please provide detailed reasoning and accompanying calculations (where appropriate) supporting your submission.

## Chapter 5

# 5 Draft Decision Instrument

### Definitions

#### 5.1 In this determination:

"*the Act*" means the Communications Regulation Act 2002(as amended);

"*the Commission*" means the Commission for Communications Regulation established under section 6 of the Act;

"*emergency call*" has the same meaning as in section 58A of the Act; and

"*the emergency provider*" means BT Communications Ireland Limited.

### Determination

#### 5.2 The Commission makes this determination:

- In exercise of its powers under section 58D (2) of the Act;
- Pursuant to the review conducted by it under section 58D (1) of the Act;
- Having had due regard to section 58D (3) of the Act;
- Pursuant to Commission Document No. 24/XX and Commission Document No. 24/XXa;
- Having duly taken account of the responses received to Commission Document No. 24/XX and Commission Document No. 24/XXa; and
- Having regard to the reasoning and analysis conducted by the Commission and set out in this response to consultation and determination.

#### 5.3 The Commission hereby determines that for the period from 12 February 2025 to 11 February 2026 the maximum permitted call handling fee that the emergency provider may charge to entities who forward emergency calls to it for handling such a call shall be €X.XX.

#### 5.4 This determination is effective from the date of the publication of this response to consultation and determination.

Q. 3 Do you agree or disagree with the wording of ComReg's Draft Determination? Please provide detailed reasoning for your views.

## Chapter 6

# 6 Submitting Comments

6.1 The consultation period will run from 22 October 2024 to 17:00 on 25 November 2024, during which ComReg welcomes written comments. It is requested that comments be cross-referenced to the relevant question numbers from this document.

6.2 Responses to this consultation should be submitted in written form (post or email) to the following address/email, and clearly marked:

**“Submission to ComReg 24/84”.**

**Commission for Communications Regulation**

**Retail Policy**

**One Dockland Central**

**1 Guild St.,**

**North Dock, Dublin 1, D01E4XO**

**Ireland**

**Email: RetailConsult@comreg.ie**

6.3 Having analysed and considered the comments received, ComReg may publish a response to consultation and decision in January 2025.

6.4 In order to promote further openness and transparency, ComReg will publish respondents' submissions to this consultation. However, ComReg must strictly maintain the confidentiality of any information provided to it in confidence. Electronic submissions should be submitted in an unprotected format so that they can be appended into the ComReg submissions document for publishing electronically.

## Legal Basis

- A 1.1 Section 58 (A) - 58 (H) of the Communications Regulation Act 2002 (as inserted by section 16 of the Communications Regulation (Amendment) Act 2007) provides generally for the establishment of the ECAS and associated matters. Section 58 (D) obliges and empowers ComReg to review and determine the maximum permitted CHF on an annual basis.

## Questions

Q. 1 Please provide any comments you may have in relation to forecast call volumes for the 2025 CHF. Please provide detailed reasoning and accompanying calculations (where appropriate) supporting your submission.

Q. 2 Are there any matters which you wish to raise as part of this review? Please provide detailed reasoning and accompanying calculations (where appropriate) supporting your submission.

Q. 3 Do you agree or disagree with the wording of ComReg's Draft Determination? Please provide detailed reasoning for your views.