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Rialáil Cumarsáide
Commission for
Communications Regulation

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1 Introduction

ComReg is entering a period of significant change. We are required to embrace new responsibilities and confront evolving market realities, as competition develops further in regulated markets, while new market configurations with new participants arise. Our existing mandate in respect of electronic communications, postal services, radio spectrum, and premium rate services remains a core part of our work. However, in addition, ComReg has recently been assigned – or expects over the lifetime of this Strategy Statement to be assigned – new responsibilities arising from, *inter alia*, the European Accessibility Act,¹ the Data Act,² the second Network and Information Systems ('**NIS2**') Directive³ and Critical Entities Resilience ('**CER**') Directive⁴ and the Artificial Intelligence ('**AI**') Act.⁵ These new powers will bring ComReg into new sectors with new stakeholders, both in Ireland and across Europe. We will continue to hold ourselves to the highest standards for a European and Irish regulator as we navigate a dynamic environment in the coming years.

In preparing this strategy, we have considered how our mandate is likely to change, and how this should be reflected in our strategy process. In particular, we have developed this strategy statement based on a number of high-level principles that will span the breadth of both our existing functions, and the new functions ComReg will soon be assigned. This allows us to communicate the principles that will guide our work over the next several years as our current dynamic environment continues to evolve. We have also decided to issue our strategy statement as a single all-of-ComReg strategy, rather than separate strategies in respect of our electronic communications and premium rate services, postal, and radio spectrum functions, as had been the practice to date. We have done so to make clear the underlying unity of ComReg's mandate, mission, and vision, across disparate sectors and responsibilities.

Over the coming years, we will take on functions including the resilience and security of key pieces of the digital ecosystem. Communications and cloud are integral technologies to our daily lives. Access, resilience and cybersecurity are critical to ensuring the trust and confidence of consumers and businesses. These sectors also form the backbone of the wider digital economy in which Ireland is a key player.

We thank our stakeholders, who have engaged positively with us in this process. We look forward to continuing to engage with both existing and new stakeholders as we chart this period of change.

¹ European Accessibility Act, Directive (EU) 2019/882

² EU Data Act Regulation, 2023/2854

³ NIS2 Directive 2022/2555

⁴ Directive on Resilience of Critical Entities (CER) 2022/2557

⁵ Artificial Intelligence Act, Regulation (EU) 2024/1689

2 Who we are, and what we do

- 2.1 The Commission for Communications Regulation ('**ComReg**') is responsible for regulating a range of communications products and services in Ireland including, but not limited to, postal services, premium rate services, electronic communications networks and services, emergency call answering and public warning communications, and radio spectrum. We have been assigned new roles in respect of accessibility requirements for end users and physical resilience. Additionally, we expect to be assigned further responsibilities in new sectors over the lifetime of this 2025-2027 Strategy Statement. These sectors are likely to include, *inter alia*, cybersecurity and access to, and use of, data.
- 2.2 ComReg operates within the statutory framework provided by Irish and EU law. Our work to serve the interests of users impacts every Irish home and business.

2.2 Our Mandate

- 2.3 **Our mandate sets out the authority we have to carry out our functions. We deliver on our mission by applying the tools and powers provided to us by our mandate.**
- 2.4 ComReg has a wide-ranging and evolving mandate which derives from extensive EU and Irish primary and secondary legislation. Our mandate has, to date, been centred on our statutory obligations which include, but are not limited to, premium rate services, electronic communication services and networks, postal services, emergency call answering and public warning communications, and managing Ireland's radio spectrum resource. Our mandate will continue to expand into new areas over the lifetime of the 2025-2027 ComReg Strategy Statement and beyond.
- 2.5 Government has, as of 2024, assigned – or signalled its intention to assign - by means of legislation, specific roles to ComReg in the areas of accessibility, cybersecurity, physical resilience, AI, cloud and data. Given the complex, multifaceted nature of a number of these areas ComReg will likely share regulatory, supervisory, or oversight responsibilities with other state agencies or regulatory authorities in certain instances.

2.3 Our Mission

- 2.6 **Our mission describes what we do and why we do it. It reflects our role and sets out the contribution we make towards achieving our vision.**
- 2.7 ComReg's mission is to deliver effective regulation. We regulate the electronic communications and postal sectors and radio spectrum. We also have – or will have

in the near future – specific responsibilities in the fields of physical resilience and cybersecurity under the NIS2 and CER Directives, as well as in the fields of data, cloud, competition law, and accessibility for end users. In a number of these fields, other agencies will also hold regulatory responsibilities.

2.8 To deliver effective regulation, we will

- (a) Facilitate a competitive communications sector in Ireland that works well for users;
- (b) Empower and protect users, including end users with disabilities;
- (c) Manage Ireland’s radio spectrum and numbering resources; and
- (d) Prepare to implement our new regulatory responsibilities.

2.9 We regularly work with other bodies and agencies. Where we share regulatory responsibilities with other bodies, we will cooperate to minimise any regulatory burden.

2.4 Our Vision

2.10 Our vision is an aspirational description of what we want to achieve or accomplish in the mid-term or long-term. Looking forward, it is the outcome we aim to help to bring about.

2.11 ComReg’s vision is to be an innovative, expert regulator which:

- (a) Delivers a regulatory environment that facilitates the development of effective competition and innovation in the Irish communications market to the benefit of users;
- (b) Promotes and protects the interests of users of electronic communications, premium rate services, radio spectrum, postal services, and designated digital services;
- (c) Take compliance action to ensure the proper functioning of markets and uphold consumer rights;
- (d) Conducts proportionate regulatory supervision within its remit under the NIS2 Directive, upon transposition;
- (e) Contributes to resolving the imbalance of power between providers and customers in the EU cloud market; and
- (f) Manages Ireland’s spectrum and numbering resources to ensure efficient usage, prevent misuse, and restore trust

all of which will underpin access to ubiquitous, affordable, and high-quality digital and communications services which support users’ social and economic needs.

2.5 Our Values

- 2.12 ComReg’s values are the guiding principles that shape our mission and vision, and they reflect our commitment to high ethical standards. They govern our decision making and how we conduct ourselves.
- 2.13 Our values serve as the foundation of ComReg’s identity and behaviour. We are guided by our values in our decision-making. They are:

Table 1: ComReg’s Values

Value	Description
Integrity	We act with honesty and respect, and adhere to the highest ethical and professional standards.
Impartiality	Our actions are evidence-based, objective, independent, non-discriminatory, and accessible.
Effectiveness	We successfully deliver our objectives in a dynamic environment.
Excellence	We are always striving to achieve the highest standards.
Transparency	We ensure trust and confidence by being clear and open in the work we do.

2.6 Our Areas of Responsibility

- 2.14 Section 31(2) of the Communications Regulation Act 2002, as amended (the ‘Act’) requires ComReg to draw up a strategy statement every two years and, in doing so, to distinguish between its functions in relation to:
- (a) Electronic communications,
 - (b) Premium rate services,
 - (c) Management of radio frequency spectrum, and
 - (d) Postal services.
- 2.15 Additionally, ComReg is gaining, and expects to gain over the lifetime of this Strategy Statement, additional functions beyond those currently enumerated in the Act.

2.6.2 Electronic Communications

- 2.16 ComReg’s role in electronic communications includes consumer protection and the economic regulation of certain markets.

- 2.17 ComReg seeks to protect and empower consumers. We will protect consumers through monitoring operator behaviour in retail markets, ensuring effective redress and, where appropriate, taking compliance action where consumer detriment has occurred. We will empower consumers through the provision of information and tools and advocating for consumers as changes occur in the delivery of communications services. Our role in consumer protection also encompasses aspects of the European Accessibility Act, which ensures that all consumers, particularly those with disabilities, are provided with information, products and services by their operators which are suited to their access needs.
- 2.18 Our economic regulation function is underpinned by *ex ante* powers set out in the European Electronic Communications Code (the '**EECC**').⁶ Where there is evidence of sufficiently effective competition, ComReg will deregulate and, over the lifetime of the 2023-2025 Electronic Communications Strategy Statement, ComReg has deregulated a number of wholesale markets. The analysis using these powers takes a forward-looking view of markets. Where ComReg intervenes in a market, it does so with the intent of addressing the anti-competitive exercise of Significant Market Power ('**SMP**') and fostering competition where it is not effective. This contrasts with our complementary *ex post* competition law powers, which operate in parallel and allow us to intervene to bring to an end to anti-competitive behaviours including abuse by a dominant firm of its SMP.
- 2.19 ComReg works to promote competition by regulating wholesale markets using its *ex ante* SMP powers. While ComReg has been in a position to deregulate a number of markets in recent years, in accordance with the principles underpinning the EECC, deregulation should occur where markets are effectively competitive on a forward-looking basis. ComReg will continue to monitor both regulated and deregulated markets having regard to both our *ex ante* SMP powers and our *ex post* competition law powers. We plan to engage proactively with the Body of European Regulators for Electronic Communications ('**BEREC**') and the European Commission ('**EC**') on the next iteration of the EC's *Recommendation on relevant markets susceptible to ex ante regulation* as well as the review of the EECC. In this context, we are of the view that, where SMP exists, *ex post* powers alone will be insufficient to ensure effective competition and that, in principle, we will continue to need the option to intervene, where appropriate, on an *ex ante* basis.

2.6.3 Premium Rate Services

- 2.20 ComReg monitors, investigates, and enforces compliance by premium rate service ('**PRS**') providers with consumer protection law, specifically the Communications

⁶ Directive (EU) 2018/1972 of 11 December 2018 (the '**EECC**') as transposed into Irish legislation by means of the Communications Regulation and Digital Hub Development Agency (Amendment) Act 2023 and European Union (Electronic Communications Code) Regulations 2022, S.I. 444/2022

Regulation (Premium Rate Services and Electronic Communications Infrastructure) Act 2010, as amended.

- 2.21 PRS consists of certain goods and services which consumers can purchase using their using their landline, mobile phone, the internet or interactive digital TV. ComReg is responsible for regulating the content and promotion of PRS which costs more than 25c per call or text. Examples of PRS include, but are not limited to, for example, chatlines, charity or non-for-profit services, TV quizzes, game shows, competitions or voting, and horoscopes or psychic services.
- 2.22 PRS providers must be licensed by ComReg, and it is an offence to provide a PRS without holding the necessary licence. ComReg maintains an electronic register of PRS providers, which allows end users to check the name and number of a PRS they intend to use or have been billed for using.⁷
- 2.23 ComReg carries out investigations relating to the provision, content and promotion of PRS to fulfil its obligation to protect the interests of end users of PRS.
- 2.24 Licensed PRS providers must abide by the conditions attached to their licences, including the requirement to comply with ComReg's PRS Code of Practice. ComReg monitors developments in the provision of PRS to ensure that end users are not incorrectly subscribed and that PRS providers adhere to requirements set out in the Code of Practice.

2.6.4 Management of Radio Frequency Spectrum

- 2.25 Radio spectrum is a medium by which information may be transmitted wirelessly over distances ranging from a few metres to thousands of kilometres. It is a valuable national resource underpinning important economic, social and communications activities. These include widely used services, such as mobile and fixed wireless communications and broadband, radio and TV broadcasting, and the safe operation of air and maritime transport. Radio spectrum is also fundamental to the operation of the emergency services and defence forces and is a vital input to important scientific applications, such as weather forecasting and monitoring the Earth's environment.
- 2.26 Radio spectrum, however, is a finite natural resource with competing uses and users which must be managed effectively and used efficiently. ComReg regularly reviews its strategy and radio spectrum workplan to ensure the effective management of Ireland's radio spectrum resource.
- 2.27 ComReg issued a separate Radio Spectrum Management Strategy Statement in 2021 for the period 2022 to 2024. The Radio Spectrum Management Strategy Statement provided further detail on the spectrum-specific goals set out in the ECS

⁷ www.comreg.ie/servicechecker

Strategy Statement 2023-2025, and also set out a detailed radio spectrum workplan. As part of the move to a single all-of-ComReg Strategy Statement, ComReg will no longer issue a separate Radio Spectrum Management Strategy Statement. Rather, ComReg details radio spectrum management work in a multi-annual Operating Plan. Accordingly, in December 2024 ComReg issued its Radio Spectrum Management Operating Plan 2025-2028, which sets out its programme of work for the next two years.⁸

2.6.5 Postal Services

- 2.28 ComReg regulates postal services and the universal postal service in Ireland. Our mandate derives from the Communications Regulation (Postal Services) Act 2011, as amended, which transposes the European Postal Services Directive⁹ into Irish law.

Postal services regulation

- 2.29 All postal service providers, including An Post, can launch any postal service after first notifying ComReg, at which point they become an Authorised Postal Service Provider. Our role in respect of such services is limited. We ensure that all postal service providers implement and publish a code of practice covering customer complaints and redress. Relatedly, we also perform a consumer dispute resolution role for both senders and receivers of post.

Universal postal service regulation

- 2.30 The universal postal service ('UPS') is a safeguard to ensure all in Ireland can get and send post nationwide. The UPS means at least one collection and one delivery to all, on every working day (Monday to Friday). The most popular universal postal service is letters for delivery within Ireland. Our purpose includes ensuring the provision of a universal postal service to all nationwide on every working day, at an affordable price, and to a sufficient level of quality. Following consultation in 2023, An Post is now the universal postal service provider ('UPSP') until 1 August 2029, unless otherwise amended by ComReg. As the UPSP An Post is subject to further regulatory requirements.

Our postal strategy

- 2.31 ComReg's 2024-2026 Postal Strategy Statement was published in December 2023 and remains in effect until the end of 2025. Upon expiry of the 2024-2026 Postal Strategy Statement, ComReg's postal strategy will be guided by the all-of-ComReg 2025-2027 Strategy Statement. The 2024-2026 Postal Strategy Statement identifies

⁸ [Radio Spectrum Management Operating Plan 2025 – 2028 | Commission for Communications Regulation](#)

⁹ Postal Services Directive, (97/67/EC)

three strategic priorities and two goals for each of those priorities, which will continue to guide our postal strategy until the end of 2025.

2.6.6 New and likely new areas of responsibility

Consumer accessibility to services

- 2.32 ComReg has new consumer accessibility responsibilities. Under the European Union (Accessibility Requirements of Products and Services) Regulations 2023,¹⁰ which transpose into Irish law the European Accessibility Act, ComReg has been designated as a compliance authority in respect of electronic communications services and emergency communications to the 112 emergency number.
- 2.33 This means that, from 28 June 2025, ComReg is responsible monitoring the compliance of these services with the obligation to be accessible to, and usable by, consumers and, in particular, people with disabilities.

Physical network resilience and cybersecurity

- 2.34 ComReg is in the process of being assigned significant roles under two EU directives. Under the NIS2 Directive ComReg will take on certain responsibilities in the field of cybersecurity, while under the CER Directive (which has been transposed into Irish law by means of the European Union (Resilience of Critical Entities) Regulations 2024)¹¹ ComReg has been designated as the competent authority for the resilience of critical entities in the digital infrastructure sector including, but not limited to, publicly available electronic communications networks, cloud computing services, and data centres.
- 2.35 Under NIS2, ComReg expects to take on significant responsibilities in cybersecurity on a pan-European basis given the principle of main establishment. NIS2 considers an entity to have its main establishment in the Member State where it predominantly takes decisions related to its cybersecurity risk-management measures. Thus, for any entities where such decisions are taken in Ireland, ComReg will have lead regulatory responsibilities.

Data

- 2.36 The Data Act is an EU regulation which entered into force in January 2024 and is due to become applicable from September 2025. Under the forthcoming EU Data Act Bill, ComReg is likely to be designated as the competent authority in the State for the switching and interoperability of data processing services delivered through cloud services, namely Infrastructure as a Service ('IaaS'), Platform as a Service ('PaaS')

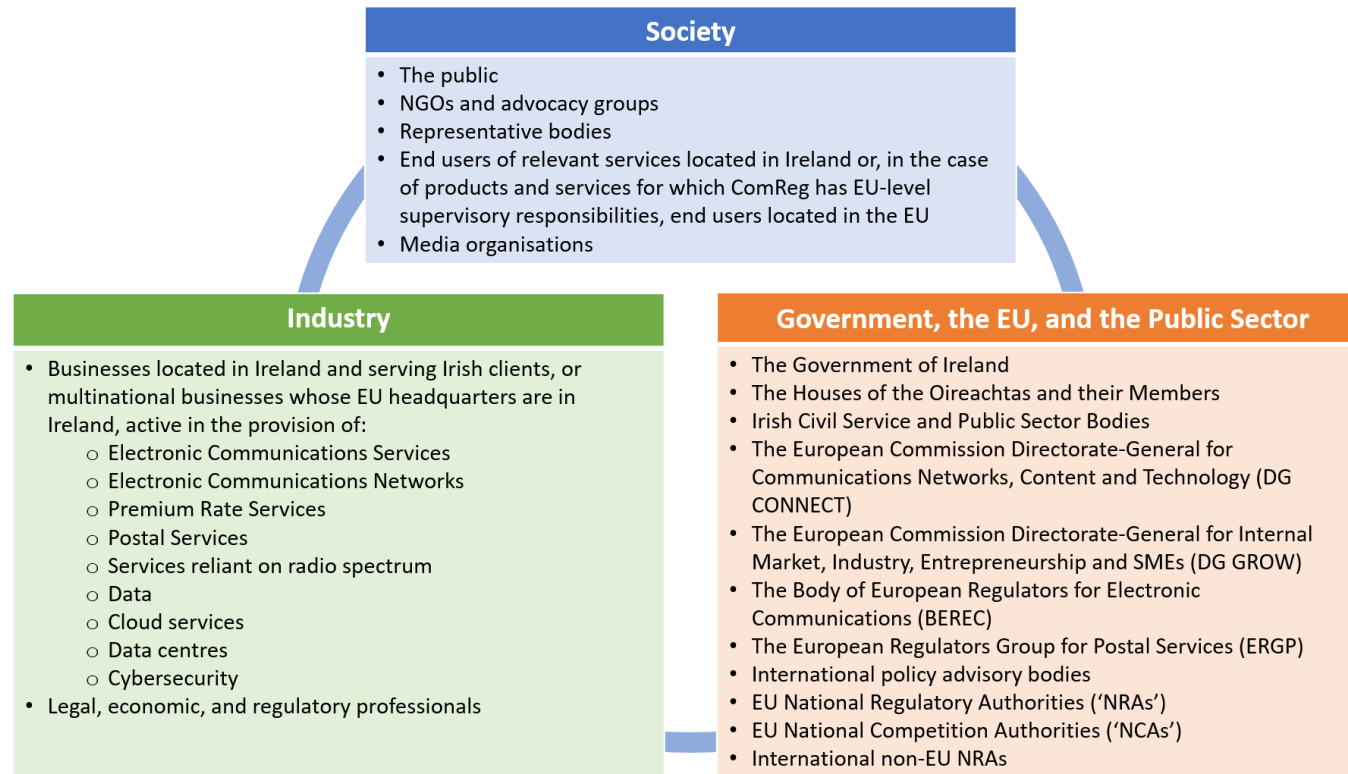
¹⁰ S.I. No. 636/2023 - European Union (Accessibility Requirements of Products and Services) Regulations 2023

¹¹ European Union (Resilience of Critical Entities) Regulations 2024, S.I. No. 559/2024

and Software as a Service (**SaaS**).

- 2.37 The exact nature of ComReg's role under the Data Act has not, as of December 2024, been finalised. ComReg expects, however, that greater clarity will be forthcoming over the term of this Strategy Statement.

3 Our stakeholders



3.1 We are guided by our values in our interactions with our stakeholders. In particular, we practice transparency, to ensure trust and confidence by being clear and open in the work we do. In practice this means that, unless we are constrained to respect the confidentiality of the information we hold, we communicate openly and proactively with our stakeholders. We want our stakeholders to engage with us, so that we deliver results which are targeted, effective, and proportionate. We also want our stakeholders to understand the reasoning underpinning our decisions and actions, and what that means for them.

4 A Changing Environment

4.1 Industry – and regulation – in transition

- 4.1 Over the past strategy period, ComReg has delivered on its mandate. Alongside our existing functions, we must now turn to delivering on what will be new in our mandate.
- 4.2 We expect our mandate and organisation to expand dramatically over the two-year term of this strategy statement, driven by the legislative developments set out above. New responsibilities will require ComReg to adapt how it regulates, while integrating new skillsets into our existing operations. We will do so in the first instance by leveraging our existing capabilities to the greatest extent possible, and also by recruiting new people to our organisation. ComReg will ensure that it affords regulatory clarity and certainty to entities that have not previously been regulated by ComReg.
- 4.3 Under ComReg’s watch, strong investment in next generation networks has continued. As of Q3 2024, 83% of Irish premises are passed by at least one fibre to the premises (**FTTP**) or cable network capable of download speeds greater than 100Mbps, of which 57% of premises have taken up a connection on these networks.¹² The ongoing rollout of FTTP by Eircom, Virgin Media and SIRO on a commercial basis, alongside NBI FTTP rollout on a state-aided basis in the Intervention Area, leaves Ireland well-placed to reach its EU Digital Decade coverage targets. Similarly, 5G rollout continues, with the European 5G Observatory noting population cover of 85.3% in Ireland as of 2023, the most recent time period for which data are publicly available.¹³
- 4.4 Against this backdrop, ComReg has focussed on the prudent application of regulation where warranted, and the removal of regulation no longer justified. ComReg will remove regulation from markets where the evidence base suggests that it is no longer required and will continue to monitor those markets which are no longer subject to regulation. In this respect, a key challenge for ComReg will be how to facilitate the proper working of markets which have been deregulated but remain highly concentrated. In the absence of *ex ante* regulation, ComReg will continue to act in the best interests of consumers to ensure fair treatment and reliable and resilient networks that consumers can trust.
- 4.5 The term of the 2025-2027 Strategy Statement coincides with a period of significant legislative, sectoral, political and economic change. In Europe, policy makers have

¹² Irish Communications Market Summary: Quarterly Key Data Report, Q3 2024. Reference: ComReg 24/98s

¹³ [5G Scoreboard – 5G Observatory](#)

identified challenges to completing the European Single Market and ensuring Europe's competitiveness on a global stage. Against this backdrop, European growth and competitiveness remains a key challenge, prompting the recent Letta and Draghi Reports. ComReg has critically assessed the analysis and proposals set out in these reports and will continue to provide comments on any forthcoming legislative proposals through the Department of the Environment, Climate and Communications ('**DECC**') and BEREC. Other geopolitical challenges include assuring the security of Europe's physical and digital communications assets in the face of malfeasance by state and non-state actors.

- 4.6 Ireland's – indeed, Europe's - future competitiveness also depends on our capacity to respond to the pace and scale of technological change. As the rollout of next generation fixed and mobile networks matures, regulators must decide, consistent with their statutory mandate, where and how to intervene in communications markets to deliver for end users. Additionally, increased and more data-intensive usage trends and emerging technologies, such as, for example, Generative AI, will throw into question whether services and networks will become constrained and, if so, how those constraints should be managed.
- 4.7 The importance of managing the digital transition is coupled with the need for a green transition, focused on minimising the negative impact of human activity on the planet. This approach is reflected in the EU's 'twin transition', and substantial change will be required across all sectors to meet Europe's – and Ireland's - climate targets. Communications and digital sectors have their part to play, both by minimising their own environmental footprints, and by enabling other sectors to minimise negative environmental impacts through digital connectivity use cases. For the communications sector, the rollout of fibre, which is replacing relatively less energy efficient legacy copper networks, is just one example of a development which will help ensure the sector's environmental sustainability.
- 4.8 ComReg is a relevant body under the Climate Action and Low Carbon Development (Amendment) Act 2021 and will continue to support DECC in the process of revising the Communications Sectoral Adaptation Plan ('**SAP**') due in 2025 under the revised National Adaptation framework ('**NAF**'). Certain adaptation measures undertaken in the face of extreme weather conditions caused by climate change, i.e. energy efficiency measures for resilience, can also contribute to the mitigation of the sectors' negative environmental impact.
- 4.9 It is important to note that our Strategy Statement reflects ComReg in a time of transition. We have not yet been assigned all our (likely) new responsibilities. In some instances – for example, NIS2 compliance – we have guidance on our role pending transposition, but we will be focussed on resourcing and establishing our new functionality over the lifetime of this Strategy Statement. In other instances, such as data and the cloud, we expect to have new responsibilities, but the parameters

thereof have not yet been defined. We are clear that ComReg will be a very different organisation by the end of this strategy term, but for some functions we may be fully established, while other functions may still be evolving.

4.2 Managing change effectively

- 4.10 ComReg is taking on significant changes in its operating environment stemming both from legislative developments and industry trends over the lifetime of this Strategy Statement. Our focus is to articulate a clear vision for our priorities amidst this change. We will manage change effectively by continuing to deliver on our mandate while responding to new imperatives.
- 4.11 **Delivering across our mandate, now and into the future:** We have a substantial existing mandate to deliver. When we take on new responsibilities which require new domains of expertise, we will ensure we have the right people on board. We will leverage our existing expertise and provide our staff with opportunities to develop the skills we require to deliver on our expanding mandate. We will also hire people with the skillsets we need to deliver on our expanding mandate and integrate them into ComReg's existing culture of excellence and commitment to public service. Our people will be united by a common sense of purpose and a shared commitment to our values.
- 4.12 **Stability in the context of change:** Delivering on the new aspects of our mandate must not come at the expense of our existing functions. While significant organisational change is required to deliver our expanded remit, we will continue to deliver on our current roles and expertise. We will ensure continued resourcing and support for the teams that maintain our existing functions while embarking on a pathway of significant expansion.
- 4.13 **Proactive Engagement:** We hold ourselves to high standards. This means always reassessing our priorities, processes and procedures to ensure that we are delivering for our stakeholders in accordance with our mandate. We will engage proactively with our stakeholders. Where those stakeholders are the entities we regulate, we will think about how best to work together to ensure that those entities interact with us as effectively as possible.
- 4.14 **Changing legislation:** Over the lifetime of the 2025-2027 Strategy Statement, further legislative change is likely. At EU level, Commission President von der Leyen has announced that the first major initiative of the new Commission will be a Competitiveness Compass which is built on the three pillars of the Draghi Report. Additionally, Commissioner Virkkunen has been tasked with delivering a Digital Networks Act building on the EC's February 2024 White Paper, *How to master Europe's digital infrastructure needs*, to help boost secure high-speed fixed and wireless broadband, and to incentivise and encourage investments in digital

infrastructure. Moreover, the EC has committed to reviewing the operation of the EECC by the end of 2025. Based on our deep understanding of markets, ComReg will play an active role in, upon request, advising the Government, and, through BEREC, the EC.

5 Our Strategic Priorities and Goals

5.1 Context

- 5.1 We set out below five strategic priorities that will underpin ComReg’s activities over the term of this strategy statement, accompanied by a series of goals. These strategic priorities reflect the significant changes ComReg will manage, while not losing sight of the important work we must carry on doing on a day-to-day basis.

Table 2: ComReg’s Strategic Priorities

Connectivity, competition and investment	We promote competition and investment in high-speed telecommunications networks and ensure the efficient management and use of the radio frequency spectrum to deliver widespread access to world class connectivity and communications.
Consumer protection and empowerment	We empower and protect consumers to choose and use communications services with confidence.
Cybersecurity and resilience	We will enhance cybersecurity and resilience by engaging with entities in sectors within scope using the powers available to us to assess their compliance with the NIS2 Directive, upon transposition, and the CER Directive, as transposed.
Compliance and enforcement	We promote compliance by operators and regulated entities with their regulatory obligations and, where necessary, exercise our powers to review, audit, and take enforcement action to address non-compliance and deter further breaches.
Our organisation	ComReg is changing. As our mandate evolves to encompass new responsibilities, we will prioritise organisational development to ensure that we perform efficiently at scale and deliver effective outcomes.

5.2 Strategic Priorities

5.2.1 Strategic Priority 1 – Connectivity, competition and investment

- 5.2 We promote competition and investment in high-speed telecommunications networks and ensure the efficient management and use of the radio frequency spectrum to deliver widespread access to world class connectivity and communications.
- 5.3 We will accomplish this strategic priority by implementing three goals.

Goal 1: We use the tools at our disposal to help achieve the digital connectivity targets set out in the Government's Digital Connectivity Strategy.

Goal 2: We promote efficient commercial investment in infrastructure and services by providing regulatory certainty and by using the tools at our disposal to create competitive incentives.

Goal 3: We promote effective and sustainable competition in retail and wholesale markets. We work towards deregulating markets where possible and levy economic regulation on markets only where there is strong and persistent evidence that

competition is not working to benefit users.

5.2.2 Strategic Priority 2 – Consumer protection and empowerment

5.4 We empower and protect consumers to choose and use communications services with confidence.

5.5 We will accomplish this strategic priority by implementing four goals.

Goal 4: We advocate effectively for consumers. We identify and understand consumer harms, assess consumer needs, and raise awareness of and implement rights and protections to mitigate those harms.

Goal 5: We empower and support consumers by ensuring that they have easy access to the information and tools they need. These should be clear, accurate, understandable, and up to date.

Goal 6: Service providers proactively uphold consumer rights. Consumers have access to timely and effective customer care, complaint handling, and redress mechanisms.

Goal 7: Service providers protect the interests of, and provide for the needs of, disabled and vulnerable end users.

5.2.3 Strategic Priority 3 – Cybersecurity and Resilience

5.6 We will enhance cybersecurity and resilience by engaging with entities in sectors within scope using the powers available to us to assess their compliance with the NIS2 Directive, upon transposition, and the CER Directive, as transposed.

5.7 We will accomplish this strategic priority by implementing the following goal.

Goal 8: Entities are required to have appropriate risk-based security measures and procedures in place to manage cybersecurity and resilience risk. We will supervise those entities by monitoring and assessing risks to their cybersecurity and resilience, and we will act quickly to require them to take action where appropriate.

5.2.4 Strategic Priority 4 – Compliance and enforcement

5.8 We promote compliance by operators and regulated entities with their regulatory obligations and, where necessary, exercise our powers to review, audit, and take enforcement action to address non-compliance and deter further breaches.

5.9 We will accomplish this strategic priority by implementing three goals.

Goal 9: We maximise our effectiveness by using fair, objective and risk-based

processes and criteria to carry out our compliance and dispute resolution roles, and to prioritise and target our investigations.

Goal 10: We promote a culture of compliance amongst operators, and we encourage operators to be pro-active in ensuring compliance with their regulatory obligations.

Goal 11: We have sufficient powers to allow us to incentivise and monitor compliance, and to deter non-compliance.

5.2.5 Strategic Priority 5 – Our Organisation

5.10 ComReg is changing. As our mandate evolves to encompass new responsibilities, we will prioritise organisational development to ensure that we perform efficiently at scale and deliver effective outcomes.

5.11 We will accomplish this strategic priority by implementing four goals.

Goal 12: We will endeavour to resource our organisation to deliver on our mandate. As we change, we will regularly review our policies, processes and systems to ensure that they continue to support us in delivering on our mandate, mission, and vision, while meeting the highest standards of corporate governance.

Goal 13: We will endeavour to ensure that we have people with the appropriate skills to deliver ComReg’s mandate by training existing staff, and also through external recruitment.

Goal 14: We have a deep understanding of the sectors we regulate and will develop a deep understanding of the sectors we are likely to shortly be active in. This enables us to will deliver robust decisions, effective analysis, and informed action, using the best available evidence, including timely and relevant data.

Goal 15: We will engage proactively with our stakeholders, including new stakeholders within our expanded remit.

6 Consultation process

- 6.1 ComReg's draft 2025-2027 Strategy Statement has been developed in consultation with our stakeholders, as well as with our staff.
- 6.2 ComReg has carefully considered respondents' submissions in drafting this Strategy Statement. ComReg looks forward to engaging with our stakeholders over the next two years in working towards achieving our common goals.

7 Performance delivery and evaluation

- 7.1 ComReg's 2025-2027 Strategy Statement articulates, at a high level, how we will execute our mission in pursuit of our vision over that timeframe. Each of our five Strategic Priorities identifies key goals which are the intended outcomes of this Strategy Statement. ComReg has a number of statutory reporting obligations which facilitate it in setting out its performance against its Strategic Priorities and Goals.
- 7.2 We are mandated under s.31(d) of the Act to report annually to the Minister on the state of electronic communications markets, on the decisions we issue, on our resourcing, and on how those resources are attributed.
- 7.3 Separately, we are mandated under s.32(3) of the Act to report in each year's Annual Report on the performance of our functions and our proposed work programme, **with reference to progress on the strategy statement**. We will therefore monitor our performance against our strategic goals in our Annual Report.
- 7.4 Finally, we are mandated under s.31(B) of the Act to prepare an annual action plan setting out the principal activities that we propose to undertake, **having regard to our strategy statement. Our strategy statement therefore forms the basis for our annual action plan** which will link specific actions to the associated Strategic Priorities and Goals set out in this Strategy Statement.