



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Accessibility of Electronic Communications Services (ECS)

Summary Information Notice

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Summary

1. Introduction

About this document

This document is a summary of the Information Notice Accessible Measures (ComReg 25/04r). It tells you about our work to make sure people with disabilities have the same access to electronic communications services (ECS) as people without disabilities.

Everyone should be able to choose and access the same level of communications services, even if we use the services in a different way.

There is a video in Irish Sign Language (ISL) of this summary document and regarding the measures in place available on ComReg's website (ComReg.ie).

Who we are

The Commission for Communications Regulation (ComReg) regulates the electronic communications sector in Ireland. The areas we regulate include:

- electronic communications networks (ECN)
- electronic communications services (ECS)¹
- radio-communications
- broadcasting transmission²

We have a wide range of tasks and aims when it comes to regulating ECN and ECS in line with European Union (EU) and national legislation.

¹ This includes a fixed-line telephone service, a mobile phone service and broadband service

² ComReg's role does not include audio/visual content, products or equipment (for example, handsets, computers, other terminal equipment, and operating systems)

ComReg's Measures

ComReg's Measures were introduced in 2014 and 2015³ to meet the needs of people with disabilities who want to choose and use ECS with confidence.

Summary of ComReg's Measures

Providers of ECS ("Service Providers") must make the following services available to people with disabilities:

1. Accessible complaints procedure
2. Accessible directory enquiries
3. Accessible top-up facility for pre-paid mobile telephone users
4. Accessible billing
5. Accessible facility to test compatibility of terminal equipment or appropriate returns policy
6. Facility for disabled subscribers to register requirements
7. Provision of text relay service (TRS)
8. Accessible information
9. Requirement for an accessibility statement

Further information on ComReg's Measures

On our website, you can watch [videos that summarise ComReg's Measures](#).

You can learn about them in more detail in these ComReg decision documents:

- Electronic Communications: [Measures to Ensure Equivalence of Access and Choice for Disabled End-Users](#)
- Measures for People with Disabilities: [Requirement for an Accessibility Statement](#)
- Provision of [Access to a Text Relay Service](#)

³ These Measures continue in force as if they were made under Regulation 94 of the ECC Regulations, S.I. No. 444 of 2022 EUROPEAN UNION (ELECTRONIC COMMUNICATIONS CODE) REGULATION 2022 ("Code regulations") pdf (irishstatutebook.ie); Regulation 113 of the Code Regulations.

Call for Inputs (public consultation)

On 4 September 2023, ComReg published:

- a public consultation, known as a [Call for Inputs](#)
- a related [summary document](#)
- a related summary in Irish Sign Language (ISL)⁴

This public consultation document aimed to ask people with disabilities for their views of ComReg’s Measures.

We wanted to know if our measures meet the needs of people with disabilities:

- when they choose, access and use ECS
- when they engage with (contact) their service provider, and throughout the consumer journey
- in terms of providing adequate consumer protection.

After the Call for Inputs

Since we published the Call for Inputs on our measures:

- the European Accessibility Act (“EAA”)⁵ has become part of Irish law
- ComReg has been given a new role as a Compliance Authority⁶ for ECS and the emergency call answering service

You can read more about EAA in Section 3 of the Information Notice ([25/04r](#)).

⁴ Irish Sign Language videos with subtitles and voiceover of the summary document is available: [Executive Summary](#) [ComReg seeks your views on measures](#) [Review of measures and consultation questions](#)

⁵ The European Accessibility Act, Directive 2019/882

⁶ The Department of Children, Equality, Disability, Integration and Youth transposed the European Accessibility Act into national law (a Directive setting out general and specific accessibility requirements for certain services, including ECS).

The importance of the transposition for ComReg is that from 28 June 2025, ComReg has a new function as a Compliance Authority for EAA under S.I. 636/2023 (Statutory Instrument giving effect to the accessibility requirements of the Directive). ComReg has been designated as the authority responsible for checking compliance of services with the requirements of the Directive

2. The respondents to our Call for Inputs

Below is a list of the 14 organisations and individuals that responded to our Call for Inputs.

We wish to thank the respondents for their submissions to the Call for Inputs.

We published the Submissions to the Call for Inputs (subject to the protection of any confidential information) on our website (25/04a).

No.	Name	Abbreviation
1	Business Carrier Coalition	BCC ⁷
2	Chambers Ireland	CI
3	Chime	
4	Eir Group	Eir
5	Individual Respondent 1	IR1
6	Individual Respondent 2	IR2
7	Individual Respondent 3	IR3
8	Individual Respondent 4	IR4
9	Irish Deaf Society	IDS
10	National Disability Authority	NDA
11	Three Ireland (Hutchison) Limited and Three Ireland Services (Hutchison) Limited	Three
12	Virgin Media Ireland	Virgin Media
13	Vision Ireland	VI
14	Vodafone Ireland	Vodafone

⁷ BCC is comprised of: AT&T, Colt Technology Services, Orange Business Services and Verizon Enterprise Solutions.

3. The key points raised by respondents

The respondents:

- broadly support the continued importance of ComReg's Measures when choosing and using ECS
- broadly support continuing ComReg's Measures to make sure ECS is accessible to everyone
- noted that ComReg's Measures are being used by those who need them
- noted technical and legislative changes that affect the accessibility of ECS

In particular, stakeholders noted:

1. **Continued need for support:** People with disabilities continue to need measures to support their access to ECS and other services.
2. **Measures with low usage:** Some of the measures had low usage, such as, Text Relay Service (TRS) and Accessible Directory Enquires (196).
3. **Continued support from Service Providers:** The Service Providers continue to support ComReg's Measures.
4. **Demographic and technical changes:** An ageing population and advances in assistive technologies and artificial intelligence (AI) may affect demand and use of ECS.
5. **Legislative changes:** Many of the accessibility requirements of the EAA apply in Ireland from 28 June 2025.

4. The European Accessibility Act (EAA)

Service Providers will have obligations under the EAA. These include:

- **Accessible information:** Service Providers must give people with disabilities access to all relevant information about the ECS, including accessibility features and facilities.
- **Customer support services:** Where available, customer support services must give information on the accessibility of the service. ComReg notes the European Commission's request to develop three new standards. These new standards include a harmonised standard for the accessibility of support services related to products and services. This includes for example, help desks, call centres, technical support, relay services and training services.
- **Real-time text and emergency communications:** From 28 June 2025, Service Providers must:
 - make an emergency real-time text (RTT) service available⁸ on mobile services in Ireland; and
 - make sure that the Emergency Call Answering Service (ECAS)⁹ can accept RTT calls. The RTT service will provide access to emergency services. (Since 2012 people with disabilities have been able to use the 112 SMS/text service to access the Emergency Services. This is accessible 24 hours a day, seven days a week.)

The EAA specifically notes, that its provisions harmonise requirements for ECS and are complementary to the requirements on equivalent access and choice in Directive (EU) 2018/1972¹⁰ ("the Code").

⁸ The European Accessibility Act, Directive 2019/882 [Directive \(EU\) 2019/ of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services](#)

⁹ Emergency Call Answering Service

¹⁰ Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (Recast)

Service providers will need to review the EAA requirements alongside ComReg's Measure to consider any impact they may have on their services in meeting their requirements; particularly in relation to:

- accessibility statements
- accessible customer support services, including complaints and query handling
- providing information on the accessibility of the ECS service

5. Conclusion

Since the introduction of ComReg's Measures, and the Call for Inputs, there have been technological changes as well as changes in the law.

Under the European Accessibility Act (EAA), Service Providers have new requirements to comply with. This includes providing accessible information about their accessible ECS. This information may be included in general terms and conditions or equivalent documents such as the accessibility statement (currently provided as part of ComReg's measures).

We understand that Service Providers are preparing for the EAA requirements to be put in place, but they are not yet in force. Therefore, we are not proposing changes to our measures at this time.

We will monitor EAA as part of our new role as the Compliance Authority for EAA. More information about this role is set out in Section 3 of the Information Notice (25/04r).

Currently ComReg's Measures remain in place. However, with advances in technology, ComReg's Measures for people with disabilities may no longer be needed as the measures become outdated and replaced. ComReg will continue to monitor this.

Further details of the responses to the Call for Inputs are in section 2 the information notice (ComReg document 25/04r) and the submissions document (ComReg Document 25/04a).