



Commission for
Communications Regulation

Information Notice

Provision of Universal Service by eircom

Performance Data – Q3 2010 (1 July 2010 to 30 September 2010)

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Foreword

The Commission for Communications Regulation (ComReg) is responsible for the regulation of the electronic communications sector in accordance with national and EU legislation. One of ComReg's functions in this regard is to determine the scope of the Universal Service Obligation ("USO") for the Irish market and decide which undertaking(s) should be designated as the Universal Service Provider(s) ("USP"). On 30 June 2010, following a public consultation, ComReg re-designated eircom as the USP for a period of two years - from 1 July 2010 to 30 June 2012.

Regulation 10 of the Universal Service Regulations requires the USP to publish information on its performance in relation to the provision of the USO. In exercise of ComReg's general powers to publish information under Regulation 17 of the Framework Regulations, ComReg simultaneously publishes the performance data with eircom on a Quarterly basis, while Regulation 32 requires the Regulator to monitor compliance with the Regulations.

ComReg D02/08 published on 28 May 2008, set legally binding performance targets for eircom to meet its obligations in respect of the services referred to in Regulation 3 of the European Communities (Electronic Communications Networks and Services) (Universal Service and Users' Rights) Regulations 2003. In accordance with ComReg D02/08, the failure by eircom to achieve any of the targets constitutes non-compliance with its regulatory obligations. ComReg has powers, under Regulation 32 of the European Communities (Electronic Communications Networks and Services) (Universal Service and Users' Rights) Regulations 2003, in relation to the enforcement of such obligations.

Following the publication of ComReg D02/08, and the clarification of certain issues, ComReg invoked Regulation 10 (5) of the Universal Service Regulations to ensure the completeness and accuracy of the data submitted by eircom by arranging for an independent audit of the data. Accordingly, performance information published by eircom is subject to independent external audit. ComReg also obtained technical input

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to verify that the definitions and the basis of calculation of each of the key metrics of the performance data were based on European Telecommunications Standards Institute (ETSI) standards.

The eircom performance data with respect to Q3 2010 (1 July 2010 to 30 September 2010) is presented in this Information Notice in relation to the performance targets set out in the Performance Improvement Programme (PIP), notified in ComReg 10/45. Performance data in relation to other elements of the USO, which are not subject to the legally binding targets, are also presented in this Information Notice. Appendix 3 also presents eircom performance data for Q3 2010 (1 July 2010 to 30 September 2010) in relation to the performance targets set out in ComReg D02/08.

Mike Byrne
Commissioner

1 Quality of Service Targets - Performance

1.1 Performance of eircom with respect to connections

This Section measures eircom’s performance in completing fixed-line installations during the reporting period by providing information on performance for in-situ connections, all other connections and connections completed by the date agreed with the customer. As ComReg publishes USO performance data on a Quarterly basis, the sum of the four Quarterly results will be an indication of performance towards the annual target. The actual annual performance will be measured, for compliance purposes, with reference to the total number of in-situ connections, all other connections and connections completed by the date agreed with the customer for the year (1 July 2010 to 30 June 2011).

Table 1.1 – In-Situ Connections¹

Annual Target – Performance Improvement Programme (1 July 2010 to 30 June 2011)		Q3 2010 Result %	YTD (Jul-Sep 2010) %
Within 24 hours of request	80% of connections to be completed within this time period	84.4	84.4
Within 2 weeks of request	99% of connections to be completed within this time period	99.1	99.1
Within 2 months of request	99.8% of connections to be completed within this time period	100.0	100.0

¹ Data reported in this section excludes information regarding in-situ connections with an agreed date, as agreed dates for in-situ connections only arise when a customer seeks, and eircom agrees to, a deferred installation e.g. a connection for a holiday home, etc.

Table 1.2 – All Other Connections²

Annual Target – Performance Improvement Programme (1 July 2010 to 30 June 2011)		Q3 2010 Result	YTD (Jul-Sep 2010)
Within 2 weeks of request	80% of all requests to be completed within this time period	89.0	89.0
Within 4 weeks of request	85% of all requests to be completed within this time period	95.2	95.2
Within 8 weeks of request	90% of all requests to be completed within this time period	98.0	98.0
Within 13 weeks of request	95% of all requests to be completed within this time period	99.2	99.2
Within 26 weeks of request	99.6% of all requests to be completed within this time period	99.8	99.8

Table 1.3 - Agreed Date completion for all connections³

Annual Target – Performance Improvement Programme (1 July 2010 to 30 June 2011)		Q3 2010 Result	YTD (Jul-Sep 2010)
Percentage of connections completed by agreed date	93%	94.1	94.1

² Data reported in this section excludes information regarding in-situ connections. Also, where a customer-introduced delay is recorded, and there is auditable evidence of such, eircom shall exclude these Valid Service Orders for the purposes of the performance targets.

³ Data relating to this metric relates to customer-introduced delays for in-situ connections. For information, a date can only be agreed for in-situ connections where the customer requests and eircom agrees to, a deferred installation.

1.2 Performance of eircom with respect to Fault Rate Occurrence

This Section measures the rate of line faults reported to eircom. All line faults reported in the specified Quarterly period are expressed in relation to the average number of installed lines for the Quarter⁴. As ComReg publishes USO performance data on a Quarterly basis, the sum of the four Quarterly results will be an indication of performance towards the annual target. The actual annual performance will be measured, for compliance purposes, with reference to the total number of line faults for the year (1 July 2010 to 30 June 2011) and the average number of installed lines for the year.

Table 1.4 – Fault Rate Occurrence

Annual Target – Performance Improvement Programme (1 July 2010 to 30 June 2011)		Q3 2010 Result	YTD (Jul-Sep 2010)
A maximum fault rate of 14.7 line faults per 100 lines (1 July 2010 to 30 June 2011)	To be achieved and fully complied with by 30 June 2011	3.5	3.5

1.3 Performance of eircom with respect to Fault Repair Times

This Section measures eircom’s performance during the reporting period by providing information on fault repairs and fault repairs completed by the date agreed with the customer. As ComReg publishes USO performance data on a Quarterly basis, the sum of the four Quarterly results will be an indication of performance towards the annual target. The actual annual performance will be measured, for compliance purposes, with reference to the total number of fault repairs and the fault repairs completed by the date agreed with the customer for the year (1 July 2010 to 30 June 2011).

⁴ For this Quarter, the rate of total faults per 100 lines was 4.8.

Table 1.5 – Fault Repair Times⁵

Annual Target – Performance Improvement Programme (1 July 2010 to 30 June 2011)		Q3 2010 Result	YTD (Jul-Sep 2010)
Within 2 working days	80% of fault repairs to be completed within this time period	78.5	78.5
Within 4 working days	95% of fault repairs to be completed within this time period	92.0	92.0
Within 5 working days	96% of fault repairs to be completed within this time period	94.4	94.4
Within 10 working days	99% of fault repairs to be completed within this time period	98.6	98.6

Table 1.6 - Agreed Date completion for Repairs

Annual Target – Performance Improvement Programme (1 July 2010 to 30 June 2011)		Q3 2010 Result	YTD (Jul-Sep 2010)
Percentage of Fault Repairs completed by agreed date⁶	95%	90.1	90.1

1.4 Performance Measurement

Performance by eircom relating to the obligations shall be determined by reference to the information normally set out in ComReg Information Notices published every Quarter and entitled “*Provision of Universal Service by eircom – Performance Data*”, or as may be published by ComReg in such other format from time to time.

⁵ Data pertaining to Fault Repairs with an Agreed Date is included in this metric from 1 July 2010.

⁶ Fault Repairs with an Agreed Date arise when an appointment is required to visit the Customer’s premises and repair the fault. The Agreed Date means the appointment date and (if applicable) the time that eircom and a Customer have agreed for eircom to visit a Customer’s premises in respect of a Fault Repair; in the case of all such Agreed Dates, the Agreed Date shall be recorded and fully verifiable.

1.5 Non-Compliance with obligations

The failure by eircom to achieve any of the targets set out in ComReg D02/08 by 30 June 2011 will constitute non-compliance and may give rise to the enforcement procedures set out under Regulation 32 of the European Communities (Electronic Communications Networks and Services) (Universal Service and Users' Rights) Regulations 2003.

2 Other USO Performance Indicators

2.1 Introduction

Regulation 10 (1) of the Universal Service Regulations requires the USP to publish adequate and up to date information on its performance in respect of the USO. The information is to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive⁷. These, in turn, are based on the European Telecommunications Standards Institute (ETSI) standards which provide precise detail on definitions and methodologies and have been used as guidance when recording the performance data. Where the ETSI standards do not cover an aspect of the USO, specific indicators have been developed to ensure that the performance is measured accurately.

2.2 Functional Internet Access

This Section records the percentage of PSTN lines that are capable of the minimum data rate of 28.8 kbps (kilobits per second) or greater. In September 2005, ComReg specified a target data rate of 28.8 kbps (kilobits per second) as the minimum data rate which could be considered as capable of delivering functional internet access. Also issued, by way of guidance, was a performance target of 94% of lines to be capable of the target data rate by June 2006. As broadband access does not fall within the scope of the USO, this guideline focuses on single narrowband connections.

Table 2.1 – Functional Internet Access

	Guideline Performance Target (ComReg D9/05)	Q3 2010 Result
Percentage of PSTN lines capable of data rate of 28.8kbps, or greater	94%	95.6%

⁷ DIRECTIVE 2002/22/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 7 March 2002 on universal service and users' rights relating to electronic communications networks and services (Universal Service Directive)

2.3 Public Payphones

This Section provides statistics on the average number of public payphones provided and the proportion of these public payphones that are in full working order during the reporting period.

Table 2.2 - Public payphones

	Q3 2010 Result
Average number of public payphones for the period	1397
Proportion of public payphones in full working order (%)	95.6

2.4 Affordability of Tariffs

This Section records the availability of the Department of Social Protection (DSP) Household Benefits Package and eircom’s Vulnerable Users Scheme (VUS) and also provides information on the number of bill correctness complaints.

Table 2.3 – Affordability of Tariffs Measures

Residential consumers who qualify for the DSP Telephone Allowance	Under the DSP Household Benefits Package, qualifying customers may avail of the Telephone Allowance (€6 per month)
eircom residential consumers availing of the VUS	eircom’s customers may avail of the VUS, which is targeted at customers with a low usage level

2.5 Bill Correctness Complaints

The following Table provides information on the number of Bill Correctness Complaints received by eircom for the period per 100 bills issued.

Table 2.4 – Bill Correctness Complaints	Q3 2010 Result
Number of Bill Correctness Complaints per 100 bills	0.07

2.6 Specific Measures for Disabled Users

This Section records the services and equipment available for people with disabilities, as follows:

For users who are hearing impaired:

- Inductive couplers
- An Amplified phone
- Visual indicator

For users that are hearing and /or speech impaired:

- The national relay service (Minicom)
- The NAD Programme

For users with limited dexterity or mobility:

- Speed dial and automatic redial buttons
- Hands free facility

For users with restricted vision:

- Braille billing, which is free of charge
- Standardised layout of key pads around central number (5) with raised dot
- Extra large high contrast buttons

For users unable to use the phone book because of a disability:

- Special directory enquiry arrangements, which are free of charge

3 Supplementary Quality of Service Performance Data

3.1 Direct Access PSTN Connections – Supply Time Fastest⁸

Supply Time Fastest for All Connections	Q3 2010 Total	Q3 2010 Residential	Q3 2010 Business
Fastest 95% - elapsed days	14	14	19
Fastest 99% - elapsed days	48	41	64

3.2 Connections with an Agreed Date v. Total Connections

	Q3 2010 Result
Percentage of Connections with an Agreed Date versus Total Connections	13.6

3.3 Direct Access PSTN Repair – Repair Time Fastest⁹

Repair Time Fastest for All Repairs	Q3 2010 Total	Q3 2010 Residential	Q3 2010 Business
Fastest 80% completed (working hours)	17.0	17.3	15.9
Fastest 95% completed (working hours)	42.9	43.7	37.7

3.4 Fault Repairs with an Agreed Date v. All Repairs

	Q3 2010 Result
Percentage of Fault Repairs with an Agreed Date versus All Repairs	6.7

⁸ Data pertaining to connections with an Agreed Date is excluded from this metric as a date can only be agreed for in-situ connections where the customer requests and eircom agrees to, a deferred installation.

⁹ Data pertaining to Fault Repairs with an Agreed Date is included in this metric from 1 July 2010.

Appendix 1 - The Universal Service Obligation (USO)

The USO is a set of requirements designed to ensure that all persons have access to a minimum set of telephone services. The services to be provided under the USO, as set out in the USO Regulations,¹⁰ are as follows:

- Meeting reasonable requests for connections at a fixed location to the public telephone network and access to publicly available telephone service. The connection is required to be capable of allowing voice calls, fax communications and data communications at data rates which would permit functional internet access
- Directory services – provision of printed Directories and Directory Enquiry service, along with the operation and maintenance of the National Directory Database (NDD)
- Provision of public payphones
- Specific measures for disabled users
- Affordability of tariffs for consumers and options to control expenditure

On 30 June 2010, following a public consultation, ComReg designated Eircom as the USP for a period of two years, from 1 July 2010 to 30 June 2012.¹¹

Detailed requirements have been set in respect of some aspects of the USO including;

- Document 05/64¹² amended an earlier decision requiring the production of telephone directories in CD format.

¹⁰ European Communities (Electronic Communications Networks and Services) (Universal Service and Users' Rights) Regulations 2003 – S.I. No. 308 of 2003, as amended

¹¹ The Provision of Telephony Services Under Universal Service Obligations (ComReg Decision No: D06/10, ComReg Document No: 10/46)

¹² [Directory Enquiry Services and Directories - Amendment of requirement to make directories available in CD format](#)

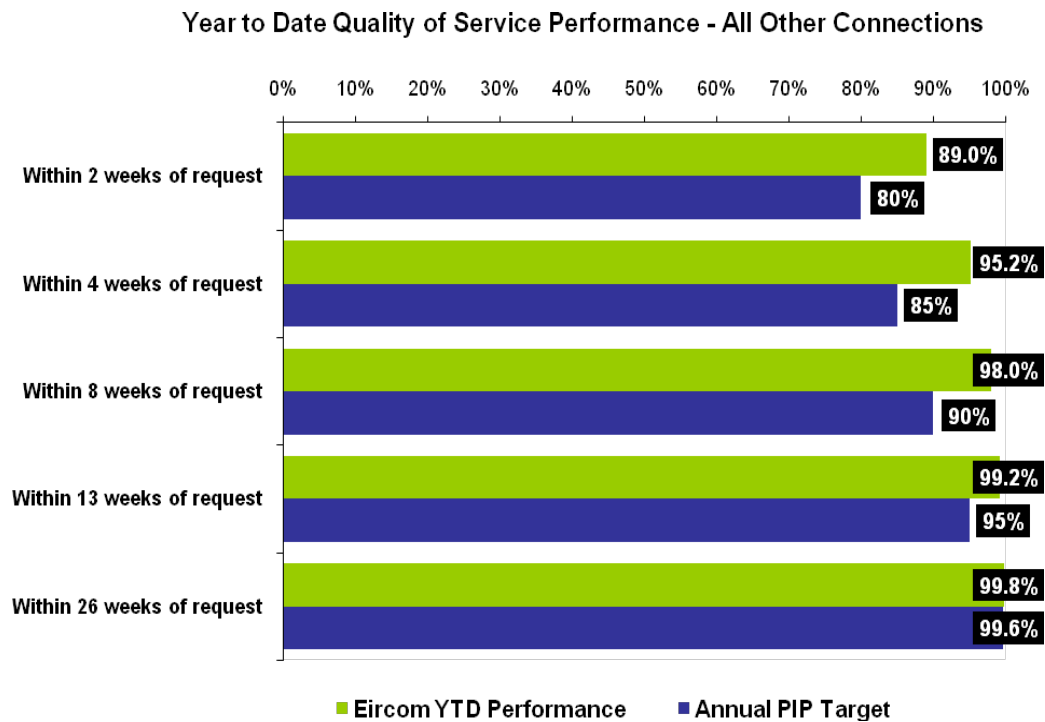
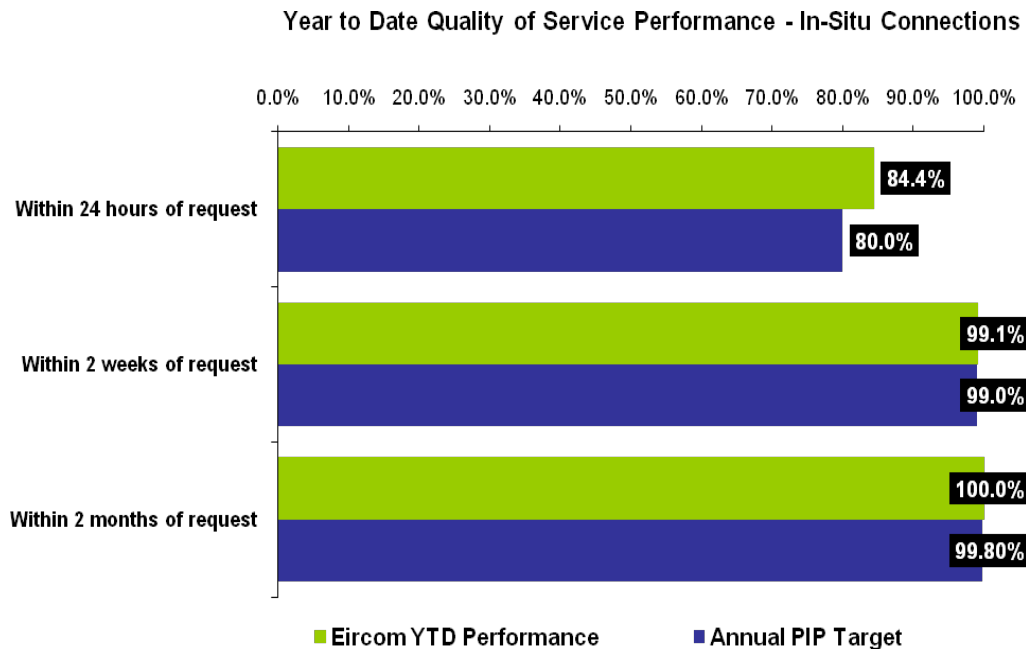
- Document 05/70¹³ set out requirements to be followed by the USP when considering the reasonableness of requests for connections and it also set out guidelines to be followed (including performance targets) in providing such connections. The document also provided guidelines in respect of a target data rate for Functional Internet Access.
- Document 06/14¹⁴ provided guidance on the criteria to be applied when considering requests for the removal or re-location of public payphones.
- Document 08/37¹⁵ (ComReg Decision D02/08), published on 28 May 2008, set legally binding quality of service performance targets for connections, fault occurrence and fault repairs for eircom, as the current designated USP to meet with effect from 1 July 2008. (The guideline connection targets published in ComReg Decision D9/05 (05/70) have been superseded by the new legally binding connection targets).
- ComReg 10/45 setting out Performance Improvement Programme Targets.

¹³ Universal Service Requirements: Provision of Access at a Fixed Location – Connections to Public Telephone Network and Provision of Functional Internet Access

¹⁴ Universal Service Obligations - Removal/Relocation of Public Pay Telephones

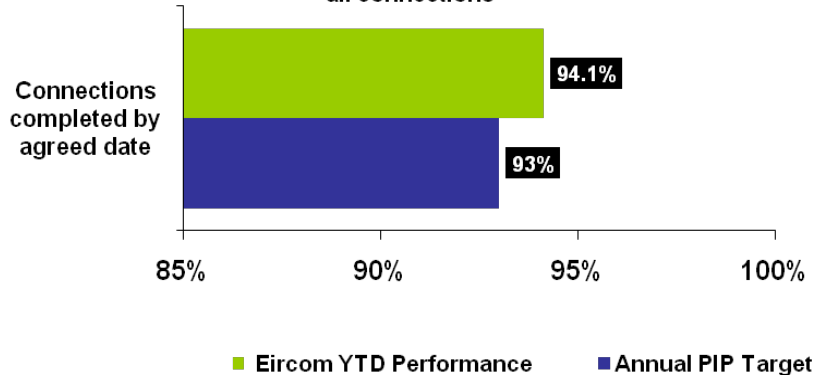
¹⁵ Decision Notice (And Decision Instrument): Response to Consultation – Eircom's Universal Service Obligation : Quality of Service Performance Targets

Appendix 2 – Graphical Representation of Eircom Quality of Service Performance

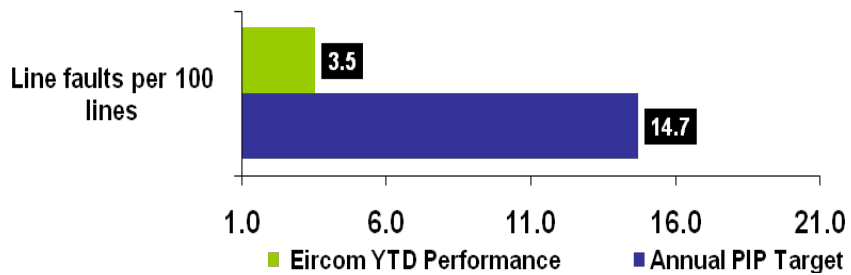


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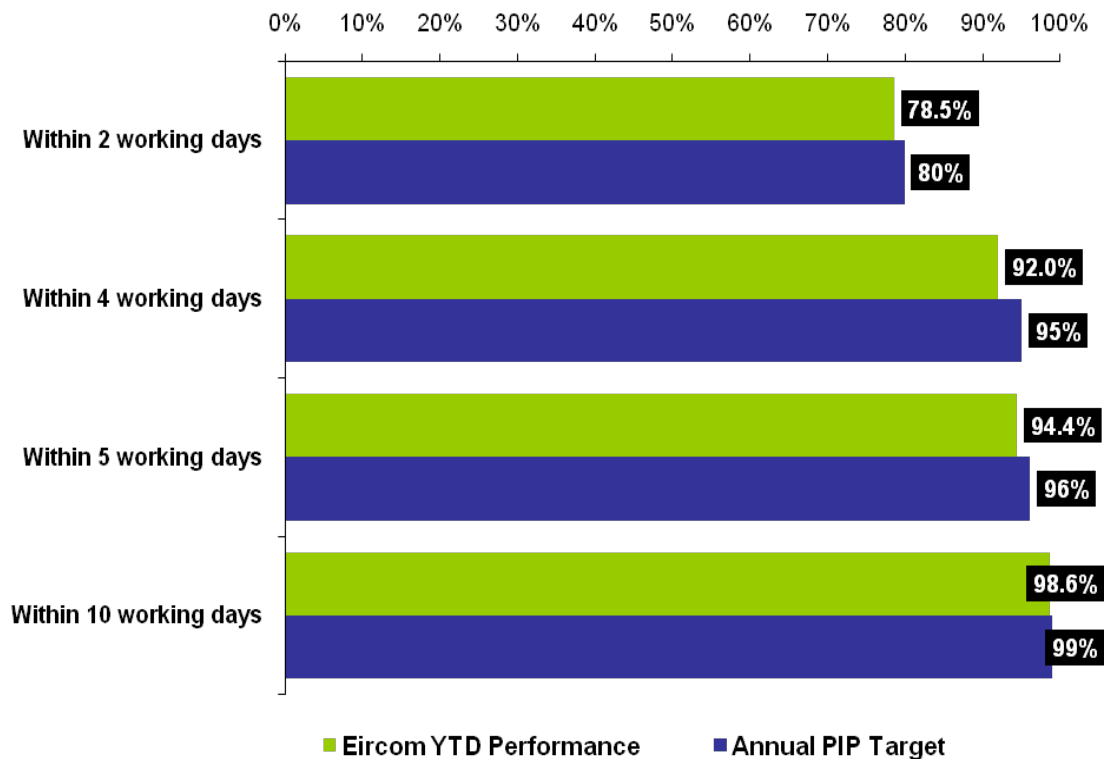
Year to Date Quality of Service Performance - Agreed Date completion for all connections



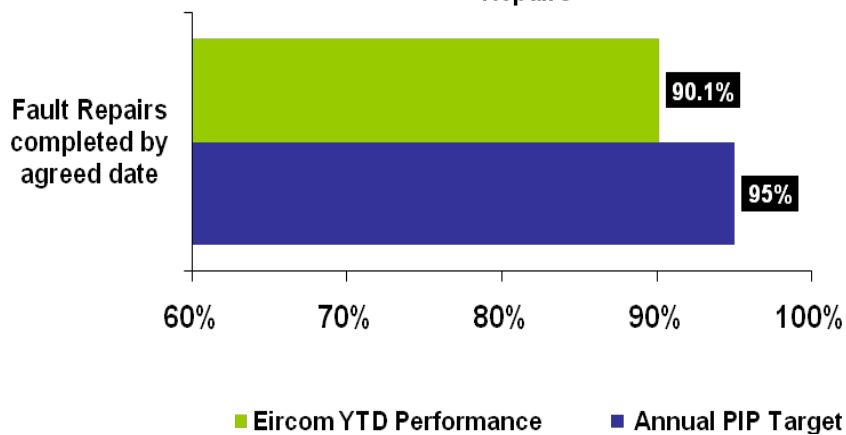
Year to Date Quality of Service Performance - Fault Rate Occurrence



Year to Date Quality of Service Performance - Fault Repair Times



Year to Date Quality of Service Performance - Agreed Date completion for Repairs



Appendix 3 – Annual Quality of Service Performance Targets
(D02/08) and Eircom Performance Results

Connections

Description of Target	Annual Performance Target (D02/08) %	Q3 2010 Result	YTD (Jul-Sep 2010)
In-situ connections within 24 hours of request	80%	84.4	84.4
In-situ connections within 2 weeks of request	99.8%	99.1	99.1
In-situ connections within 2 months of request	100%	100.0	100.0
All other connections within 2 weeks of request	80%	89.0	89.0
All other connections within 4 weeks of request	85%	95.2	95.2
All other connections within 8 weeks of request	90%	98.0	98.0
All other connections within 13 weeks of request	95%	99.2	99.2
All other connections within 26 weeks of request	100%	99.8	99.8
Connections completed by Agreed date	95%	94.1	94.1

Fault Repairs

Description of Target	Annual Performance Target (D02/08)%	Q3 2010 Result	YTD (Jul-Sep 2010)
Fault repairs completed by Agreed Date	95%	90.1	90.1
Fault repairs completed within 2 working days	80%	78.5	78.5
Fault repairs completed within 4 working days	95%	92.0	92.0
Fault repairs completed within 5 working days	99.8%	94.4	94.4
Fault repairs completed within 10 working days	100%	98.6	98.6

Fault Rate Occurrence

Description of Target	Performance Target 30 June 2011 (D02/08)	Q3 2010 Result	YTD (Jul-Sep 2010)
A maximum fault rate of line faults per 100 lines	13.5	3.5	3.5