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Sean Mooney Commission for Communications Regulation 1 Dockland Central Guild Street Dublin 1 D01 E4X0

By email only: sean.mooney@comreg.ie

23rd May 2022

Re: KPI decision

Dear Sean,

eir has reviewed Information notice ComReg 22/27 and requests that the matters set out below are clarified in the final Decision.

- Paragraph 3.31 states that ComReg *"has decided not to split the KPI metrics into POTS based and Standalone metrics"*. However Schedule 4 Table 6 in the notified decisions has the metrics split into POTS based and standalone. Can you please confirm if CGA metrics are to be split into POTS based and standalone or not?
- Schedule 3 Definition and Calculation of KPI defines Metric 22 as "The percentage of NGA Non In-situ orders that did not reach their final status (Cancelled, Completed or Undeliverable) with one appointment as a percentage of accepted Non In-situ orders calculated as follows". As Metric 23 to 26 looks to the percentage of orders that required 1 or more appointment to reach their final status is Metric 22 meant to be orders that require one appointment to complete or is this metric to represent the orders that did not reach a final state in the reporting period and are to be reported as residual metrics in the next reporting period?
- eir notes the proposed fault KPI metrics and that a fault may have up to 3 clear codes this may result in the same fault being counted in more than one metric. We note the draft decision does not cater for fault suffixes.
- eir notes that the notified decision does not cater for the fact that all NGA orders are appointment based and has assigned a fixed time-based metric to orders electronically enabled. As previously stated, orders will not complete until the scheduled appointment date which the Operator can change.

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• In relation to the CGA metric reporting is it possible to align the reporting with NGA as in report on a quarterly basis as opposed to monthly?

I look forward to hearing from you.

Yours sincerely,

W. M. Carry

William McCoubrey Head of Regulatory Strategy