



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Accessibility of Electronic Communications Services

Information Notice

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An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

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1 Executive Summary

Introduction

1. The Commission for Communications Regulation (“ComReg”) is the statutory body responsible for the regulation of the electronic communications sector and the postal sector in Ireland. ComReg regulates telecommunications (electronic communications networks (“ECN”) and electronic communications services (“ECS”)), radio-communications, and broadcasting transmission¹. ComReg has a range of functions and objectives in relation to the provision of ECN and ECS in accordance with European Union (“EU”) and national legislation.
2. ComReg notes that the existing general consumer protections in place² and new consumer protections under the Communications Regulation and Digital Hub Development Agency (Amendment) Act 2023³ protect consumer interests.
3. Access to ECS and related information should be equivalent for people with disabilities as it is for people who do not have disabilities. Everyone should have equivalent access to and choice of ECS. For example, people with disabilities should benefit from the same usability of ECS and related information as other users of those services, even if the way they use these services is different. This is what the word ‘equivalence’ means, and it is in this context that the measures were put in place by ComReg in 2014 and 2015⁴ (“ComReg’s Measures”) to meet the needs of end-users with disabilities to choose and use ECS with confidence.
4. ComReg’s Measures assist in ensuring ECS services and information are accessible to all including those with disabilities. Details of ComReg’s Measures can be found in three separate ComReg decision documents:
 - Electronic Communications: [Measures to Ensure Equivalence of Access and Choice for Disabled End-Users](#)
 - Measures for End-Users with Disabilities: [Requirement for an Accessibility Statement](#)
 - Provision of [Access to a Text Relay Service](#)

¹ ComReg’s role excludes audio/visual content or equipment (for example, handsets, computers, other terminal equipment, and operating systems) or products.

² Communications Regulation and Digital Hub Development Agency (Amendment) Act 2023

³ [Communications Regulation and Digital Hub Development Agency \(Amendment\) Act 2023](#)

⁴ 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

5. In summary, ComReg’s Measures consist of specific services and information to be made available by Providers of ECS (“Service Providers”) to end-users with disabilities relating to:
 - Accessible complaints procedure
 - Accessible directory enquiries
 - Accessible top-up facility for pre-paid mobile telephone users
 - Accessible billing
 - Accessible facility to test compatibility of terminal equipment or appropriate returns policy.
 - Facility for disabled subscribers to register requirements.
 - Provision of text relay service (TRS)
 - Accessible information
 - Requirement for an accessibility statement.
6. On 4 September 2023, ComReg published a Call for Inputs, as well as the associated summary document and a summary in Irish Sign Language (ISL).
7. ComReg sought the views of end-users with disabilities on the effectiveness of ComReg’s Measures and how they meet the needs of end-users with disabilities when accessing and using ECS.
8. In the time since the Call for Inputs on the review of ComReg’s Measures was published, the European Accessibility Act (“EAA”)⁵ has been transposed into national law. ComReg has been assigned a new function as a Compliance Authority⁶ for ECS services and the emergency call answering service, under S.I. 636/2023⁷. The EAA is discussed in Section 3.

This Information Notice

9. This document sets out;
 - a high-level summary of the feedback received from stakeholders to the Call for Inputs and ComReg’s consideration of the continued relevance and appropriateness of its Measures to ensure equivalence of access and choice of ECS, having taken into account their views.

⁵ The European Accessibility Act, Directive 2019/882

⁶ Since the publication of the call for inputs, 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).

⁷ S.I. No. 636/2023 - European Union (Accessibility Requirements of Products and Services) Regulations 2023

- a high-level overview of the general and specific accessibility requirements on Service Providers, an overview of the requirements of the main points of the EAA and the potential impact of the implementation of the EAA on ComReg's Measures.

10. **Service Providers are obliged to comply with some of the EAA requirements from 28 June 2025** (requirements in scope for Service Providers are noted at section 1.1 and in section 3)

1.1 Call for Input: Summary of key points raised by Stakeholders

11. In summary, the overall feedback received from the stakeholders supports the continued importance of ComReg's Measures when choosing and using ECS. In this regard, respondents were broadly supportive of the continuation of ComReg's Measures to ensure equivalent access to ECS. The submissions noted that ComReg's Measures are being used by those who need them. Responses also noted the evolving needs of end-users as regards ECS and in some cases made some suggestions as regards possible enhancements to ComReg's Measures.
12. Stakeholders also noted technical and legislative changes impacting accessibility of ECS services. In particular, stakeholders noted:
 - **Continued relevance:** End-users with disabilities continue to require Measures to support their access to ECS and other services.
 - **Declining usage trends:** Notwithstanding the relevance of ComReg's Measures, the usage of Measures, such as, TRS and Accessible Directory Enquiries (196) is in decline.
 - **Continued support:** The Service Providers continue to support implementation of ComReg's Measures.
 - **Demographic and technical changes:** An aging population and advancements in assistive technologies and artificial intelligence ("AI") may affect demand and use of ECS services.
 - **Legislative changes:** many of the accessibility requirements of the EAA are applicable in Ireland from 28 June 2025.

1.2 The European Accessibility Act

13. As set out in the Call for Inputs, ECS Service Providers will have obligations under the EAA. In summary, EAA requirements for electronic communications include, amongst other items,

- **Accessible Information:** Access to all relevant information about the ECS Service including accessibility features and facilities, must be provided for end-users with disabilities.
- **Customer Support Services:** Where available, customer support services must provide information on the accessibility of the service. ComReg notes the European Commission's standardisation request for the development of three new standards, including, a harmonised standard for the accessibility of support services related to products and services (help desks, call centres, technical support, relay services and training services).
- **Emergency Communications:** From 28 June 2025, an emergency Real Time Text ("RTT") service must be made available on mobile networks in Ireland and the Emergency Call Answering Service ("ECAS")⁸ must be able to accept RTT calls. The RTT service will provide access to emergency services. ComReg notes that currently, and since 2012, end-users with disabilities have been able to use the 112 SMS/Text service, on a 24 hour/7 day per week basis, to access the Emergency Services.
- **Real Time Text and Emergency Communications:** From 28 June 2025, Real Time Text ("RTT") must be made available on all mobile services in Ireland. In addition, the Emergency Call Answering Service ("ECAS") must be able to accept RTT calls. The RTT service will provide access to emergency services. ComReg notes that currently, and since 2012, end-users with disabilities have been able to use the 112 SMS/Text service, on a 24 hour/7 day per week basis, to access the Emergency Services.

14. The EAA expressly calls out that its provisions harmonise requirements for ECS and are complementary to the requirements on equivalent access and choice in Directive (EU) 2018/1972⁹ ("the Code"). There is a correlation between the accessibility requirements of the EAA and those on equivalent access and choice under the Code. Service Providers will need to assess the EAA requirements as against ComReg's Measures that are currently in place and consider their impact on their requirements. Service Providers will need to factor this in to meeting their requirements under the EAA, particularly in the context of accessibility statements, accessible customer support services including complaints and query handling and providing information on the accessibility of the ECS service.

1.3 Conclusion

15. Since the introduction of ComReg's Measures, and the issuing of the Call for Inputs, there have been both technological and legislative advancements

⁹ Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (Recast)

which seek to ensure further accessibility for end-users with disabilities when accessing and using ECS.

16. For Service Providers, under the EAA, they will have new requirements to comply with, including the provision of accessible information about their accessible ECS services. 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).
17. However, as the accessibility requirements of the EAA are not yet in force, and ComReg understands that Service Providers are preparing for their implementation, ComReg is not proposing changes to ComReg's Measures at this time.
18. ComReg will monitor EAA in accordance with its remit. More information about this role is set out in Section 3 below. In the interim, ComReg's Measures remain in force and relevant as broadly supported by the submissions to the Call for inputs, thereby ensuring equivalent access to, and choice of ECS. Further details of the responses to the Call for Inputs are in section 2 of this document and the submissions document (ComReg Document 25/XXa)

2 Overview of Responses to the Call for Input

2.1 What did we ask?

19. ComReg wanted to understand if its Measures remain relevant and fit for purpose in choosing and using ECS. We asked questions in relation to the following:
- Trends and developments in demographics, technology, and the market in general which may affect the relevance or performance of ComReg's Measures.
 - ComReg's Measures, their individual relevance and potential changes which may make them more useful.
 - ComReg's Measures in general, whether they are helpful or not; whether there are other factors which may be relevant.

2.2 Who responded?

20. The following 14 organisations and individuals responded to the Call for Inputs.
- Business Carrier Coalition¹⁰ (BCC)
 - Chambers Ireland
 - Chime
 - Eir Group (Eir)
 - Individual Respondent 1 (IR1)
 - Individual Respondent 2 (IR2)
 - Individual Respondent 3 (IR3)
 - Individual Respondent 4 (IR4)
 - Irish Deaf Society (IDS)

¹⁰ BCC is comprised of; AT&T, Colt Technology Services, Orange Business Services and Verizon Enterprise Solutions.

- National Disability Authority (NDA)
- Three Ireland (Hutchison) Limited and Three Ireland Services (Hutchison) Limited (Three)
- Virgin Media Ireland (Virgin Media)
- Vision Ireland
- Vodafone Ireland (Vodafone)

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

22. The submissions include those received from individual respondents, including members of Electromagnetic Sense Ireland. The issues raised by the individual respondents include the requirement for information regarding the potential health effects of Mobile/Wi-Fi Electromagnetic Radiation₁ and concerns about the retirement of the Copper Network₂.

23. ComReg notes that similar concerns have been raised by respondents in relation to the following consultations.

- Electronic Communications Strategy Statement Response to Consultation 22/109¹¹
- Framework for the Migration from Legacy Infrastructure to Modern Infrastructure; Response to Consultations and Decision- ComReg 23/102¹²

24. ComReg notes the concerns raised, ComReg has responded to these matters in responses in both the [ComReg Strategy Statement](#) and [Migration from Legacy infrastructure](#) published documents.

25. ComReg has published the Submissions to the Call for Inputs (subject to the protection of any confidential information) on its website (25/XX).

¹¹ [ComReg 23/34b](#) See pages 55 & 56, Paragraphs 5.5 to 5.10.

¹² [ComReg 23/102](#) See page 22, Paragraphs 2.28 and 2.31.

2.3 What did the respondents say?

Trends and Developments

26. Chime stated that it “largely agrees with the narrative as set out” in the Call for Inputs and noted “that people have more access to and depend more on technology”. Chime noted that the use of Live Captioning has the potential to enable those with hearing loss to make calls. Virgin Media stated that Apple (iOS) and Google (Android) continue to enhance device assistive technology and accessibility and usability tools and features. Vodafone also submitted that there are technological advances which may improve accessibility and usability of OTT¹³ and devices. NDA highlighted Total Conversation and AI-based systems which may present as an opportunity or a challenge for end-user with disabilities.
27. In relation to ECS, IDS observed “one noticeable trend that the IDS has observed is that some Service Providers are making Deaf customers register for specific accessible services. For example, services like the 112 Emergency text service”¹⁴.
28. IDS also noted “There are no accurate statistics on the size of the Deaf community in Ireland, but it is estimated that 5,000 people communicate in Irish Sign Language (ISL) as their primary language together with a community of an estimated 40,000 including family, friends and those working in the Deaf community”.
29. Vision Ireland stated that it “feels the numbers of people needing access services is likely to continue to grow with the aging population. Age related sight loss is on the rise, and this is expected to continue”.
30. Chambers Ireland is of the view that “Digital Accessibility needs to continue to improve”.
31. BCC considers that if requirements related to end-users with disabilities were placed on business to business (B2B) Service Providers, it would add an unnecessary layer of extra burden, with no benefit for the enterprises/wholesale businesses or the end-users with disabilities in question.
32. The NDA noted that it is essential that persons with disabilities have equivalence of choice in respect of accessing complaints and redress

¹³ OTT stands for “over-the-top” and refers to technology (OTT services or platforms) that delivers streamed content via internet-connected devices.

¹⁴ For the avoidance of doubt, ComReg confirms that registration is no longer required for SMS to 112.

procedures. NDA notes that since the introduction of ComReg's Measure the following have also come into force, the UN Convention on United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)¹⁵, and the EAA.

33. Eir submitted that it noted the decline¹⁶ in the use of ITRS; the number of calls to the 196 directory enquiries and the number of customers that require braille bills. Eir further noted that, although a decline in use might not negate the need for such services, ComReg should assess the extent of the decline in use of the services as a trend, and the reasons for the decline in use, which may signal a need for a change in the delivery of ComReg's Measures. However, Eir, noted that it considered that ComReg may in future consider the long-term viability of the 196 service, and alternative methods of providing the service could be considered.
34. ComReg welcomes the submissions in relation to these demographic changes, technological advancements, and the impacts of regulatory and legislative changes.

Irish Sign Language (ISL)

123. ComReg notes that, since 2017, the ISL Act¹⁷ obliges public sector entities such as ComReg to provide access to its own consumer supports via ISL. This is done by providing access to the SLIS/IRIS¹⁸ service for a consumer to contact ComReg's Consumer supports (there are a number of ways for a consumer to contact ComReg's Consumer supports¹⁹ including, Text, Live Webchat). ComReg also provides information in relation to ComReg's Measures in ISL on its website.
124. ComReg understands that end-users with disabilities may choose to use ISL using SLIS/IRIS²⁰ when contacting their ECS service provider's complaint or enquiry service.

ComReg's Measures:

Accessible Complaints procedures

35. Respondents including Chime, Vision Ireland, NDA, Virgin Media and Vodafone submitted that ComReg's Measure is needed to ensure that end-users with disabilities have access to customer services and complaints

¹⁵ [Convention on the Rights of Persons with Disabilities \(CRPD\) | Division for Inclusive Social Development \(DISD\)](#)

¹⁶ See Submissions document (ComReg Doc 24/XX)

¹⁷ [Irish Sign Language Act 2017](#)

¹⁸ Irish Remote Interpreting Service provided by SLIS.ie

¹⁹ [Contact our Consumer Care team | Commission for Communications Regulation](#)

²⁰ Sign Language Interpreting Service (SLIS) is the national Sign Language Interpreting Service for Ireland. Established in 2007, SLIS is supported and funded through the Citizens Information Board. Slis.ie

procedures (to make a complaint or an enquiry). Vodafone also submitted that a specific accessible channel should not be overly specific to the extent that innovation is constrained.

36. Chime submitted that it is “quite difficult and time-consuming for anyone to make a complaint” and suggested that a specific service be available to support end-users with disabilities in accessing customer services and complaints procedures.
37. IDS considered “that the complaints procedure is not very accessible for Deaf people”.
38. Both Chime and IDS noted that Service Providers do not seem to provide information about their complaints processes in ISL.
39. The NDA submitted that ComReg’s Measures “already established are maintained to guarantee that persons with disabilities can address issues which arise from time-to-time”. The NDA also submitted that ComReg’s Measures “have considered various modalities, which appear to cover most disabilities, the NDA advise consideration of the specific case of persons with Intellectual Disabilities (ID). Amongst other points,”. NDA also queried “are complaints procedures available in easy-to-read formats? Have operators been trained in appropriate language etc. which should be used when interacting with persons with Intellectual Disabilities and autistic people?”
40. Chambers Ireland also generally supported ComReg’s Measure.
41. Most respondents also noted the importance of staff training in relation to delivering ComReg’s Measures.

ComReg’s Considerations

42. As set out in the Call for Inputs, Service providers have obligations when it comes to complaints and enquiry procedures (including under the Accessible Complaints Procedures Measure). The accessible means provided by the Service Providers may include, but is not limited to telephone, SMS, letter, and email, and also include the ability to nominate a third party to deal with complaints and/or enquiries on behalf of the end-user with disabilities.
43. ComReg notes that where a Service Provider has not properly provided access to its complaints and enquiry processes, for example not processing a complaint when raised via SLIS, details of any concerns about this issue can be raised by the SLIS customer with ComReg about the specific service provider. ComReg can then raise exact details of any reported concerns with the relevant ECS service provider.

44. ComReg, in Decision No. D04/17²¹, sets out the minimum requirements for Service Providers' Codes of Practices for complaint handling to assist consumers when making a complaint. In all instances, consumers must first raise a complaint with their Service Provider before contacting ComReg. All ECS Service Providers are obliged in law to have a Code of Practice for complaints handling in order to communicate how they deal with disputes and what steps a consumer must follow. If the consumer has not had their complaint resolved within 10 days, they can then contact ComReg.

45. ComReg also operates a dedicated Consumer Line to help answer queries from consumers relating to both ECS Service Providers and PRS Providers. Consumers can contact the Consumer Line²² by:-

- **Consumer Queries:** consumerline@comreg.ie
- **Through our online form:** Consumer Care Online Complaint Form
- **By telephone:** (01) 804 9668
- **By post:** Consumer Care, Commission for Communications Regulation, One Dockland Central, Guild St., Dublin 1, D01 E4X0.
- **By webchat:** start a conversation here www.comreg.ie/adviceinformation/consumer-care/
- **By text:**
 - Send a text with the word COMREG to 51500 (standard SMS rates apply) and we will call you back.
 - Send a text with the word ASKCOMREG to 51500 (standard SMS rates apply), with a brief outline of the issue you need help with, and we will text you back.
 - IMPORTANT – Please use the keyword ASKCOMREG in all follow up text messages about your issue, including replies.
- **By Text Relay:** Find out more details from www.itrs.ie
- **Irish Sign Language (ISL):** consumers can also contact us to arrange an ISL remote interpreting session with the Sign Language Interpreting Service (SLIS).

²¹ Electronic Communications Complaints Handling Code of Practice - Response to Consultation and Decision Reference ComReg17/62 Decision No D04/17.

²² [Contact our Consumer Care team | Commission for Communications Regulation](#)

46. ComReg also has a facility to support consumers who wish to authorise a third party to deal with ComReg on their behalf known as Third Party Authorisation (“TPA”)²³. ComReg can then engage with a Service Provider and the TPA on behalf of an end-user (who is the account holder). ComReg has noted an increase in the use of this option by end-users.
47. It should be noted that ComReg’s Measure obliges Service Providers to provide an accessible means for end-users with disabilities to access a Service Provider’s customer service, and that this means should include the ability to nominate a third party to deal with complaints and/or enquiries on behalf of the disabled subscriber.
48. As part of ComReg’s Measure, Service Providers are also obliged to implement disability awareness training to ensure that staff handling complaints and queries are aware of the requirements of end-users with disabilities and have the requisite skills to appropriately deal with those requirements.
49. In anticipation of the forthcoming implementation of the EAA, ComReg is not proposing changes to this Measure at this time.

Provision of text relay service (TRS)

50. Chime stated “...this Measure(TRS) ²⁴ currently provides a level of access and choice, it does not do so on an equivalent basis, as it is only available for certain hours, i.e. less than (sic) 50% of the time. Chime believes that this Measure should be available 24/7 in order to provide equivalent access. It is a measure that is not only beneficial to users for planned use, but also in unplanned or crisis situations, e.g. contacting a relative in an emergency”.
51. IDS stated “The existing service, the Irish Text Relay Service (ITRS), does not meet the expected standards. Unfortunately, few Deaf people use ITRS because it is not a great system, and the education system has left many Deaf individuals with lower literacy levels. On the other hand, IRIS²⁵ is more popular because it is delivered through ISL²⁶, which is more accessible”. IDS noted concerns about the www.ITRS.ie website and the quality of the ITRS service provided to end-users.

²³ More information about Third Party Authorisation, including online versions of the application forms, is available on our website [online:] [Third Party Authorisation Application Forms](#)

²⁴ Text Relay Service (TRS) is provided in Ireland by the Irish Text Relay Service (ITRS) www.ITRS.ie

²⁵ Irish Remote Interpreting Service (IRIS.ie)

²⁶ Irish Sign Language

52. Eir pointed to the decline in take up and usage²⁷ of the ITRS. Vodafone noted “the service use remains low at an average of 10 per day text to voice offered in the six months from January to June 2023. That does not negate the need to provide a solution to address the purpose for which the service is used”.
53. NDA submitted that it “concurred with ComReg’s assessment of the need in respect of the continuation of this service. The data provided shows that it is used by those who need it”.

ComReg’s Considerations

54. TRS²⁸ allows many end-users who may be Deaf or Hard of Hearing to access ECS. ComReg publishes the take-up and usage figures of the service twice per year, including an Infographic²⁹. The most recent publication indicated that an average of 274 (see table 1) text to voice TRS calls are being made on a monthly basis and this usage does not seem to be increasing³⁰. In general, end-users (including end-users with disabilities) now have a wider choice of communications methods when using ECS; video-calling is almost ubiquitous, as are text services.

Table 1 TRS Calls and Texts offered Jan- Jun 2024 by Month.³¹

TRS Calls	January – June 2024	
	Text to Voice	Voice to Text
Jan	308	1
Feb	363	20
Mar	287	3
Apr	296	4
May	212	6
Jun	178	2

55. ComReg received submissions from stakeholders in 2021 regarding accessibility of the ITRS website (www.ITRS.ie). The ITRS Service Providers reviewed the website in conjunction with the relaunch of the ITRS in 2022. The review assisted in ensuring the ITRS website was in line with the WCAG 2.1 AA standards. Improvements to the following elements of the website were carried out:

²⁷ Text Relay Service Take-up and Usage statistics - July to December 2023

²⁸ Text Relay Service (TRS) is provided through the Irish Text Relay Service (ITRS) at www.ITRS.ie

²⁹ [Using the Irish Text Relay Service \(ITRS\) to make and receive calls](#)

³⁰ [Text Relay Service Take-up and Usage statistics; January to June 2024 | Commission for Communications Regulation](#)

³¹ Full details available - [Text Relay Service Take-up and Usage statistics; January to June 2024 | Commission for Communications Regulation](#)

- Templates
- Content
- Colour Contrast
- Labelling
- the addition of ISL videos³²

56. ComReg has promoted www.ITRS.ie at a number of outreach events at which it was a participant, such as;

- November 2024 - 50 Plus Show in Limerick
- October 2024 – Health & Wellbeing Age Expo in Ennis
- September 2024 – 50 Plus Show in Cork
- May 2024 – 50 Plus Show in Galway
- March 2024 – 50 Plus Show in Dublin

57. As noted in section 3 below, Real Time Text (“RTT”) must be made available on all mobile services in Ireland and the ECAS must be in a position to accept RTT calls. As well as person-to-person communications, it will be possible to use RTT to contact the ECAS for access to emergency services. It is possible that RTT may replace TRS wholly or in part. However, until the RTT service has been in place for a reasonable period, the extent to which it is a substitute for TRS will not be absolutely clear. ComReg considers that ComReg’s Measure - Provision of TRS - should remain at this time pending implementation and assessment of RTT. ComReg is not planning to suggest changes to ComReg’s Measure in advance of 28 June 2025 when RTT and, accessible ECS, and accessible customer service aspects of the EAA are due to be implemented.

Accessible Information

58. Chime stated that “The primary change that is required in this matter is that there is robust auditing of the provision of Telecoms in this regard”. Chime also noted concerns regarding; one-click access from the homepage to the ‘Disability Section’ of the website and information on services that are required under ComReg’s Measures to Ensure Equivalence, such as (the facility to test terminal equipment).

59. The IDS stated “that it is crucial that all communications made by Service Providers are done in plain English and would be most accessible with an ISL translation available. If there are updates or changes made that will specifically affect Deaf people, it is necessary that these updates are shared directly with Deaf people, with any information being targeted that way. This

³² For example : [Making A Call – ITRS](#)

information must be clear and in both ISL and English to ensure accessibility for all Deaf people”.

60. The NDA noted that the EAA will bring new and more stringent obligations for operators providing a range of products and services. The NDA advise “that continued auditing of relevant Service Provider websites, including all user journeys, takes place on a regular basis to ensure that persons with disabilities can access all relevant information. We note that specific pages, or sections of Service Providers’ websites are dedicated to the needs of persons with disabilities. It should be made clear to relevant organisations that a Universal Design approach to the design of digital environments recommends that they are designed such that they can be used by all people. Thus, ensuring that the relevant section of the website on which specific disability-related information is located, is not the only portion of the platform which must be made accessible. For example, persons with disabilities should have equivalent access to eCommerce facilities, as well as billing and/or other relevant customer-focused information”.
61. The NDA also noted “as with all end-users, persons with disabilities have a right to access information relevant to the products and services they wish to purchase or have purchased. We therefore wish to state unequivocally that access to information, in a manner which best suits the needs of persons with disabilities is essential and point to Article 21 of the UN Convention on the Rights of Persons with Disabilities”. The NDA further notes “as Ireland has ratified the UN Convention on the Rights of Persons with Disabilities, access to information should be viewed as a right for all citizens, including persons with disabilities. Therefore, this equivalence of access and choice of ECS should be prioritised”.
62. Vodafone noted that “the feedback as part of the call for input is important as are the requirements of the European Accessibility Directive and in particular the requirements in Annex I and Annex V of the Directive. The requirements and any associated guidance under the Code (SI 444 of 2022) need to be consistent with the broader requirements of the Accessibility Directive”.
63. Chambers Ireland stated that “it should be noted and made sure that this information is available in all formats for people experiencing a range of disabilities”.

ComReg's Considerations

64. ComReg notes that submissions indicate how important Accessible Information is to end-users with disabilities; both the content of the information and the method of access to the information.
65. As set out in the Call for Inputs, Service Providers are obliged to provide accessible information about their services, including, the available services for end-users with disabilities, in line with the obligation Accessible Information Measures to Ensure Equivalence of Access and Choice of ECS for End-User with Disabilities.
66. The requirements of ComReg's Measure are in addition to the forthcoming requirements of the EAA as they relate to accessible information. In that context, Service Providers will need to consider any implications of the EAA if its implementation of the EAA requirements in relation to the availability of Accessible Information and its impact.

Requirement for an Accessibility Statement

67. Chime submitted that “many people with disabilities are unaware of ComReg's Measures in place, and accessibility statements can help address this – especially if they are positioned prominently on provider's websites and other areas such as retail outlets”. Chime also noted difficulty in locating Accessibility Statements on some Service Providers websites,
68. Vision Ireland noted “believes this is essential as it provides comfort, and it sets out what the disabled customer can expect to receive in terms of support.”
69. NDA submitted that in relation to Accessibility Statements, it considers “that provision of an Accessibility Statement is important for persons with disabilities to determine what products and services are available to them in a manner which suits their needs”. NDA further notes “that providing this information in a standardised and centralised location ensures that persons with disabilities only need to look in one specific location, rather than having to search through an entire website for information located in a variety of places”.
70. The NDA added “the Department of Public Expenditure, NDP Delivery and Reform and NDA's revised Customer Communications Toolkit for Services to the Public - A Universal Design Approach³³, that when considering the

³³ [Customer Communications Toolkit for Services to the Public — A Universal Design Approach](#)

provision of information in accessible formats, a focus on which format may support individual needs rather than specifying particular formats”.

71. Virgin Media agreed that the Accessibility Statement Measure is needed, “it provides a very important means of support and information point for our customers. The Accessibility Statement is located on the footer of our website, and we receive an average of 300 visits per month to this webpage, which highlights its importance”. Virgin Media also noted that it “would be happy to review/take on board suggestions arising from the call to input feedback on any changes/additional information/ content that would be of useful and of value and benefit to visitors and customers to our webpage.”
72. Vodafone agreed that the Accessibility Statement (ComReg’s Measure) is needed.
73. Chambers Ireland stated that “it should be noted and made sure that this information is available in all formats for people experiencing a range of disabilities. ComReg, in collaboration with Service Providers, needs to carry out awareness campaigns in order to inform people of the services that are available for them.”

ComReg’s Considerations

74. As set out in the Call for Inputs, Service Providers must supply Accessibility Statements for end-users with disabilities. They are obliged to provide information about how to access ComReg’s Measures in their Accessibility Statements and they are required to publish their Accessibility Statements on their websites in line with ComReg decision (06/15) Measures for End-Users with Disabilities: Requirement for an Accessibility Statement. ComReg’s Measure obliges Service Providers, providing ECS directly to end-users to publish and maintain an accessibility statement which must contain, at a minimum, information on:
 - the specific accessibility services and support available to end-users with disabilities; and
 - the range of accessible contact methods and details to assist end-users with disabilities accessing information including in the Accessibility Statement and with contacting their service provider;
 - the Service Provider’s approach and policy in respect of providing services and information to end-users with disabilities.
75. The EAA requires that Service Providers are obliged to provide a general description of the service provided in accessible formats, and should include:
 - Descriptions and explanations necessary for the understanding of the operation of the service, and

- A description of how the accessibility requirements relevant to ECS Service Providers will be met.

76. ComReg will continue to monitor compliance with the current ComReg Measure. The requirements of ComReg's Measure are in addition to the forthcoming requirements of the EAA as they relate to accessible information and accessibility statements. In that context, Service Providers will need to consider any implications of the EAA if its implementation of the EAA requirements in relation to the availability of Accessibility Statement and its impact. ComReg will also be the Compliance Authority in relation to accessible ECS provisions of the EAA.

Accessible top-up facility for pre-paid mobile telephone users

77. Chime noted "Without ComReg's Measure many Deaf and Hard of Hearing people who use pre-paid phones could not upload pre-paid credit independently".
78. IDS submitted that it understands "that there are alternative options such as topping up online, or via your banking app, however it is our experience that many people in the Deaf community are not aware of these alternative options and use the method of topping up by purchasing credit in their local shop which then requires a phone call to be made which results in the Deaf person requiring extra support". IDS "believe information about alternative accessible methods needs to be widespread and more accessible to ensure that Deaf people know that the option is there for them".
79. The NDA also supported the availability of this service, "as it could be of particular use for older people".
80. Vision Ireland submitted that it "believes this is necessary".

ComReg's Considerations

81. From the submissions received, ComReg's Measure remains important and useful in ensuring that end-users with disabilities can independently top-up the credit on their pre-paid mobile phones.
82. Information about ComReg's Measure is required to be available via the Accessibility Statements that Service Providers are obliged to provide on their websites.
83. As noted throughout this document, the EAA will also oblige Service Providers to provide accessible information about their services.
84. ComReg will monitor the implementation of ComReg's Measure.

Accessible Directory Enquiries

- 85. Vision Ireland submitted “this is essential in the view of Vision Ireland as blind, or vision impaired people face challenges in accessing printed materials and for some online access can be challenging”.
- 86. Eir noted that calls to this service are generally in decline. However, Eir also noted “that low usage may not negate the requirement for access to the service”.
- 87. Chime also noted its support for ComReg’s Measure.
- 88. Chambers Ireland submitted that ComReg’s Measure “is needed for people with disabilities. It should continue to be free of charge for users that are visually impaired otherwise it might discourage them from seeking this service at all”.
- 89. The NDA noted that it “is pleased to concur with ComReg’s assessment that the accessible directory services is required to provide access to directory services for those who are blind, vision-impaired”.
- 90. Virgin Media “agrees that ComReg’s Measure for ‘accessible directory enquiries’ is still needed. We agree with ComReg’s assessment, we believe that the service is still warranted and remains relevant in the context of usage of the service. The cost of general direct directory enquiries is high and maintaining this service ensures continuity of a free means of access to directory services, to support elderly users and users without, or who do not use online facilities”.
- 91. Vodafone also noted it supported “this service on our network and welcome feedback”.

ComReg’s Considerations

- 92. ComReg notes the submissions regarding declining usage of the service. There are alternative choices available to those who are blind or visually impaired when they need to access directory enquiries. However, the service remains relevant to those who use it.
- 93. In anticipation of the EAA implementation, ComReg is not at this time considering a change to ComReg’s Measure.

Accessible Billing

- 94. Vision Ireland “believes this is essential to allow people who are blind and vision impaired be able to manage their finances independently and monitor usage”.
- 95. Chime noted its support for ComReg’s Measure also.

96. NDA submitted that “there can be issues with documents in PDFs and screen readers”. Virgin Media also noted its support for ComReg’s Measure.
97. Eir noted “a decline in the requests for braille bills, although a decline in use might not negate the need for such services”.

ComReg’s Considerations

98. ComReg’s Measure remains useful for end-users, as it is essential that end-users with disabilities have access to their ECS bills³⁴³⁵.
99. In anticipation of the EAA implementation, ComReg is not at this point considering a change to ComReg’s Measure which remains in place as a service for end-users with disabilities.

Accessible facility to test compatibility of terminal equipment or appropriate returns policy.

100. Chime submitted “Many phones are not compatible with hearing aids or cochlear implants, so ComReg’s Measure is essential for Deaf and Hard of Hearing people who use such technology when they are purchasing phones.”
101. NDA submitted “Whilst broadly defined classifications of disability exist ... the needs of persons with disabilities are highly individualised” NDA “consider that the opportunity to test a device for an extended time, and to return it if it is deemed unsuitable, is both welcome and essential. Given the ubiquitous nature and availability of smart-devices, and the wide-ranging impact of disabilities, we consider it important to attempt to capture why a user might not continue to use the device long-term. Therefore, we suggest that instruments are designed to capture the reasons why users are returning the device. This should be simple and easy to administer and should not place an undue burden on either the user returning the device or the Service Provider. Capturing this information could inform future iterations of design and ultimately render the device more usable for persons with disabilities”.
102. NDA also submitted “At present, the opportunity to avail of, and test devices is available to persons with specific disabilities. The document notes that “Under the Measure “Accessible Facility to Test Compatibility of Terminal Equipment or appropriate returns policy”, Service Providers selling terminal equipment must make accessible facilities available for end-users with disabilities who use a hearing aid or have a cochlear implant, once certification of disability is provided by a registered medical practitioner or, by an appropriate agent.” We advise that this facility is extended to persons with other disabilities”.

³⁴ [Billing & Disputed Charges | Commission for Communications Regulation](#)

³⁵ [Service Provider Accessibility Requirements | Commission for Communications Regulation](#)

- 103. Virgin Media agreed that ComReg's Measure, the "facility to test compatibility of terminal equipment or appropriate returns policy' is still needed".
- 104. Vodafone also agreed "this is an important service".

ComReg's Considerations

- 105. The ability to ensure that terminal equipment, such as a mobile phone, is compatible with an end-user's hearing aid or cochlear implant makes ComReg's Measure useful and necessary or those who need it.
- 106. ComReg is not at this point considering a change to ComReg's Measure ahead of the of the EAA implementation by Service Providers. Additionally, ComReg notes that its remit in relation to the EAA requirements will extend to the accessibility of ECS services and not to products.

Facility for end-users with disabilities to register requirements³⁶

- 107. Chime noted that "while measures should exist to enable as many people as possible to access services independently, ComReg's Measure is important for people who may struggle to look after their own affairs, such as those with intellectual challenges or cognitive decline through ageing".
- 108. IDS supported ComReg's Measure and suggests that "involves creating a system for disabled people to communicate their specific needs to their Service Providers. This measure holds great promise for the Deaf community, as it addresses a frequent problem they encounter when dealing with Service Providers. The issue of inaccessibility often arises because many Service Providers do not fully understand the requirements of Deaf people, which often leads to a complicated communication process. For example, while the Irish Remote Interpreting Service (IRIS) allows Deaf people to communicate with their Service Providers through ISL interpreters, it is common for Service Providers to request additional permission from Deaf customers before accepting calls through a third-party ISL interpreter. This extra step causes delays and inconvenience for Deaf customers. To streamline this process and ensure a smoother experience, it is essential to establish a way for Deaf people to specify their requirements and preferred communication methods from the beginning".
- 109. Vision Ireland "agrees that this registration service is required" Vision Ireland also notes that the measure "saves the disabled customer having to explain their access needs each time they contact the company".
- 110. NDA noted that the uptake of this service is low.

³⁶ In ComReg decision 04/14 this measure is known as "**Facility for disabled subscribers to register requirements**"

111. Chambers Ireland suggested that the registration process should be easy, alternatives to filling out physical forms should be identified for end-users to use.
112. Three submitted it “has remained committed to ensuring that our customers can present in store, online, or on the phone and can raise their accessibility requirements with us and have them acknowledged and responded to in the appropriate manner so that they may enjoy all of our services and products in the same manner as customers who do not have accessibility requirements’ that details of a customer’s disability status are likely to be “Special Category Personal Data” (formerly “Sensitive Personal Data”) as defined by Data Protection law, and as such their processing by Data Controllers such as telecommunication operators is limited. Any requirement with regard to registration should therefore relate solely to the requirements of customers and should not compel operators to process personal data containing detail of customers’ health or disability.”
113. Virgin Media agreed “that the Measure ‘facility for customers with disabilities to register requirements with their service provider’ is needed”.
114. Vodafone agreed “that customers should be able to inform us of specific requirements to support how they use their service. This information also informs agent service delivery”

ComReg’s Considerations

115. Service Providers are required to provide a facility for end-users with disabilities to register their requirements with them. Details of this facility are required to be included in Service Providers’ Accessibility Statements, published on their websites. In general, Service Providers offer various methods of contact for end-users with disabilities to complete the registration. The methods include, online, by contacting their provider by call or text, or in person where retail stores are available.
116. ComReg has noted above an increase in the use of the TPA option by end-users when engaging with the Service Provider. As also noted throughout this document, the EAA will also oblige Service Providers to provide information about the accessibility of their services and accessible customer support services.

ComReg’s Measures in general

117. ComReg asked the following two questions;

Do you think Measures for end-users with disabilities as listed are helpful to make sure end-users with disabilities enjoy the same access to and choice of ECS as most people?

Can you think of other factors that are relevant to consider in making sure end-users with disabilities enjoy the same access to and choice of ECS as most people?

118. Chime noted that ComReg's Measures, "particularly the 'service focused' Measures, are essential for many Deaf and Hard of Hearing people to access ECS, particularly the accessible top-up facility, text relay service and facility to test terminal equipment. Technological advances can improve access and choice, particularly in Apps".
119. Vision Ireland submitted that "in most cases the current provisions are supporting people who are blind, and vision impaired".
120. NDA submitted that ComReg's Measures "represent equivalence of access and choice of ECS for persons with disabilities". The NDA submitted that ComReg's Measures "are not seen as an exhaustive list, and that it may need to grow over time. As products and services evolve, and the requirements of persons with disabilities change".
121. Eir stated that "if ComReg is to further review the current measures for end-users with a disability, it should complete a holistic review of the Measures. This should include all the options available to best assist end-users with disabilities to use electronic communications services, which may be outside of the remit of ComReg. For measures to be as effective as possible in assisting end-users with a disability, ComReg must base any changes to the Measures on clear evidence".
122. Eir further submitted that, "ComReg must ensure that any changes to the Measures are proportionate towards industry and provide an adequate lead time for industry to implement any changes that may be proposed in a formal consultation".
123. Virgin Media submitted that ComReg's Measures "are helpful to support people with accessibility needs enjoy the same access to and choice of ECS".
124. Vodafone noted that "it would welcome publication of responses to the call for input for all stakeholders. It is also appropriate that there is further consideration through the forums on Electronic Communications Services for End- Users with disabilities". Vodafone also stated that "it agreed the Measures are helpful and welcome ongoing review and engagement within the industry and with other sectors to ensure solutions provided are serving the needs of customers regardless of any disability".

ComReg Consideration's

125. Overall, ComReg notes submissions received to ComReg's review of the Measures highlight that they remain relevant and valuable for end-users with

disabilities. This is notwithstanding the low take-up and usage of some of them.

3 The European Accessibility Act (EAA)

3.1 What is the EAA:

126. Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services (“the EAA”) was transposed by SI 636 2023 – European Union (Accessibility Requirements of Products and Services) Regulations 2023 (“the EAA Regulations”).
127. The EAA introduces harmonised rules on accessibility for private sector products and services in the EU. This means that for products they must:
- be designed and produced to maximise their use by people with disabilities, and
 - comply with detailed rules on information and instructions, user interface and functionality design, support services and packaging, and that services must:
 - provide information about the service, its accessibility features, and facilities
 - Ensure websites and mobile devices are fully accessible
 - Where available, support systems, such as help desks, call centres and training to provide information on accessibility, and
 - apply practices, policies, and procedures to address the needs of people with disabilities.
128. In relation to Electronic Communications the EAA Regulations will apply to
129. **Service Providers;**
- (a) electronic communications services, other than transmission services used for the provision of machine-to-machine services³⁷

ComReg’s role:

130. From 28 June 2025 ComReg will be the compliance authority for In-scope electronic communications services (including emergency call answering) only, covered under the EAA.

Some of the main points for Service Providers:

131. The EAA requirements for ECS Service Providers as for the provision of other relevant services include:

³⁷ [S.I. No. 636/2023 - European Union \(Accessibility Requirements of Products and Services\) Regulations 2023](#)

Accessible Information:

132. All relevant information about the service, including accessibility features and facilities, must be provided in formats accessible to people with disabilities.

Accessible websites and mobile applications:

133. Websites, online services, and mobile apps must comply with accessibility standards to ensure usability for end users with disabilities.

Support services:

134. Where available, information regarding Accessible customer support systems, including call centres and help desks, must be accessible.

Training and awareness:

135. Staff must be trained to assist and accommodate end-users with disabilities effectively.

Real time text (RTT)

136. Specifically with respect to Service Providers, from June 28, 2025, Real Time Text (RTT) must be made available on all mobile services in Ireland and the ECAS³⁸ must be in a position to accept RTT calls.

137. RTT is a communications technology that allows users to type and read text as part of a phone conversation, with text being exchanged in real time. It allows text to be transmitted instantly as it is typed, enabling immediate interaction between users. The technology facilitates conversations without delays. As the text is transmitted as part of a call any disadvantages associated with discrete texts (as in the current SMS model) are minimised and the experience is more integrated and comprehensive.

138. As well as person-to-person communications, it will be possible to use RTT to contact the ECAS for access to emergency services. Service Providers must ensure that emergency communications using voice and text (including RTT) is synchronised and is transmitted by the Service Providers to the most appropriate public safety answering point (PSAP)³⁹.

139. It is possible that RTT may replace TRS wholly or in part. However, until the RTT service has been in place for a reasonable period, the extent to which it is a substitute for TRS will not be absolutely clear. ComReg considers that the

³⁸ Emergency Call answering Service

³⁹ Irelands Emergency Call Answering Service (ECAS) is the Stage-1 PSAP (Public Safety Answering Point) responsible for answering all emergency communications from people located in Ireland and onward connecting those emergency communications to the Stage-2 Emergency Services, Garda, Ambulance, Fire Service and Coast Guard in Ireland. See www.112.ie for further detail.

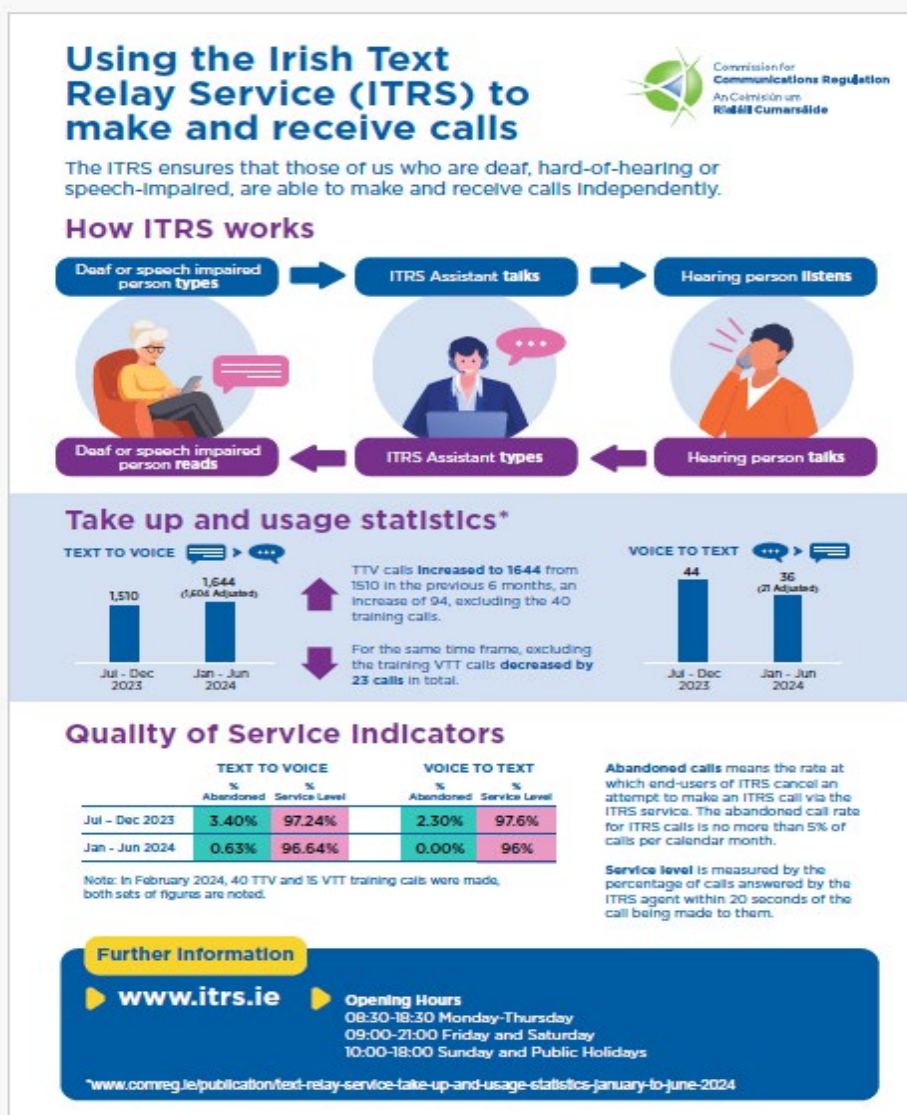
Provision of TRS measures should remain at this time pending implementation and assessment of RTT.

4 Conclusions

140. Since the introduction of ComReg's Measures, and the Call for Inputs, there have been both technological and legislative advancements which seek to ensure further accessibility for end-users with disabilities when accessing ECS.
141. ComReg's Measures remain in place, however, with developments, such as advancements in technology, in time, some or all of ComReg's Measures for end-users with disabilities may no longer be necessary as they eventually become outdated and replaced. ComReg will continue to monitor this.
142. However, under the EAA, service Providers will have a number of requirements, to comply with including accessibility requirements for customer support services and also requirements for real time text provision. ComReg considers accessibility as a key aspect of customer service. It helps to ensure that all end-users including those with disabilities can effectively engage with their provider throughout their customer journey.
143. Many of the requirements of the EAA relating to ECS services and information (set out in section 3) may have an impact, in time, on ComReg's Measures that are supporting equivalence in access to, and choice of, ECS services for end-users with disabilities.
144. The accessibility requirements of the EAA are not yet in force, and ComReg understands that Service Providers are preparing for their implementation after 1 July 2025. Therefore, ComReg does not propose changes to ComReg's Measures at this time. ComReg will monitor EAA implementation by ECS Service Providers in accordance with its remit.

Appendix: Text Relay Service

- A 1.1 ComReg publishes the Irish Text Relay Service (ITRS) Take-up and Usage statistics. The reports are available on ComReg’s website.⁴⁰
- A 1.2 The following infographic contains an overview of the most recent report. An accessible pdf version of the infographic is available by clicking [here](#).



⁴⁰ [Irish Text Relay Service usage report published | Commission for Communications Regulation](#)

