

ComReg Consumer Care Statistics Report

Q3 2022 – 1 July to 30 September 2022

Information Notice

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Corrigendum Q3 2022

Consumer Care Statistics Report Q3 2022 - July to 30 September 2022 (Document Reference ComReg 22/91) duplicated Figure 9 at Figure 21. Figure 21 should have shown queries and complaints split by Fixed Service Provider. Accordingly, the chart in Figure 21 has been revised to reflect this.

1: Executive Summary

ComReg's Consumer Care team manage consumer contacts in relation to Electronic Communications Services (ECS), Premium Rate Services (PRS) and postal services. This publication¹ includes information on issues raised by service providers' customers and recorded by ComReg in Q3 2022^{2,3}.

In Q3 2022, ComReg's Consumer Care team recorded approximately 10,100 consumer contacts and 3,600 issues. In Q2 2022, 3,400 issues were recorded, and approximately 9,600 consumer contacts were received. ComReg's Consumer Care team managed approximately 2,300 Service Provider contacts during Q2 2022 and 1,700 Service Provider contacts during Q3 2022. 91% of all issues recorded were queries and 9% of all issues were complaints. 83% of all issues recorded relate to ECS, 2% relate to PRS, and 15% relate to 'Not for ComReg'/Other. There was a 22% decrease in the total number of issues recorded compared to Q3 2021; ECS issues decreased by 18%, and PRS issues decreased by 82%.

In Q3 2022, ComReg's Consumer Care team recorded 276 Mobile Service Provider issues for Eir. 281 issues were recorded for 3. 283 issues were recorded for Vodafone. The median resolution time for Mobile Service Provider complaints was 10.0 working days, the same in Q2 2022. The average number of complaints per 100,000 subscribers was 1.4, compared to an average of 1.6 complaints per 100,000 subscribers in Q2 2022.

In Q3 2022, ComReg's Consumer Care team recorded 666 Fixed Service Provider issues for Eir. 253 issues were recorded for Sky. 198 issues were recorded for Virgin Media. 307 issues were recorded for Vodafone. The median resolution time for Fixed Service Provider complaints was 11.0 working days, the same as in Q2 2022. The average number of complaints per 100,000 fixed voice lines was 4.1. The average number of complaints per 100,000 fixed broadband lines was 9.9.

¹ From Q3 2022, this publication has been re-named from "Consumer Line Statistics Report" to "Consumer Care Statistics Report".

² The basis for inclusion is where the total number of ECS and PRS issues recorded in the relevant quarter is in excess of 100 and 40, respectively.

³ ECS providers are referred to in this report as per their trading name on the <u>ComReg Service Register</u>.

2: Consumer Care Overview

2.1 Consumer Care Contacts

In Q3 2022, approximately 10,100 consumer contacts were received by ComReg's Consumer Care. ComReg's Consumer Care is available from Monday to Friday 8.00am to 8.00pm and Saturday 9.00am to 1.00pm. Figure 1 below shows the split of these contacts by channel⁴ over the last five quarters. In Q3 2022, phone and e-mail/online form continued to be the most popular methods of contact. ComReg's Consumer Care received approximately 1,700 service provider contacts in Q3 2022.

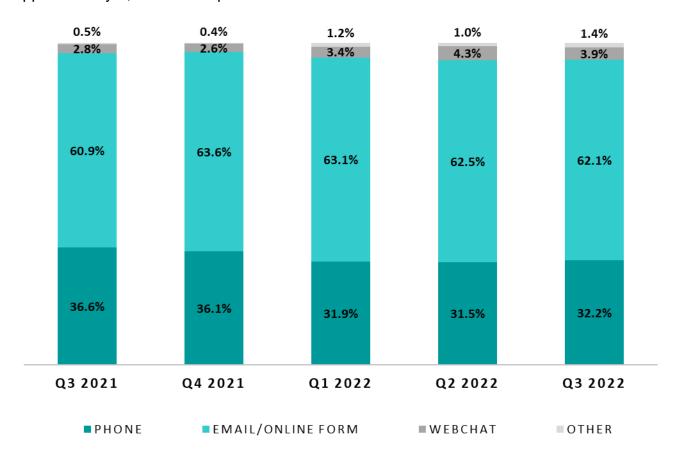


Figure 1: Split of contacts to ComReg's Consumer Care by channel Q3 2021 - Q3 2022

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⁴ The contact channel 'Other' includes contacts received by letter and SMS. For further details on ComReg's Consumer Care contact channels, see Annex 1.

2.2 Consumer Care Survey

Consumers who contact ComReg's Consumer Care via phone are presented with the option to provide feedback through a phone or e-mail survey. The survey consists of four questions, three of which pertain to the consumer's experience with ComReg (for queries and complaints), and one of which pertains to the consumer's experience with their operator (for complaints only). Consumers are asked to rank their responses using a scale of 1 to 5⁵.

In Q3 2022, consumers completed 373 phone surveys in relation to queries, 277 phone surveys in relation to complaints, and 96 e-mail surveys in relation to complaints. Figure 2 below outlines the questions contained in the survey and the average ratings received in Q3 2022.

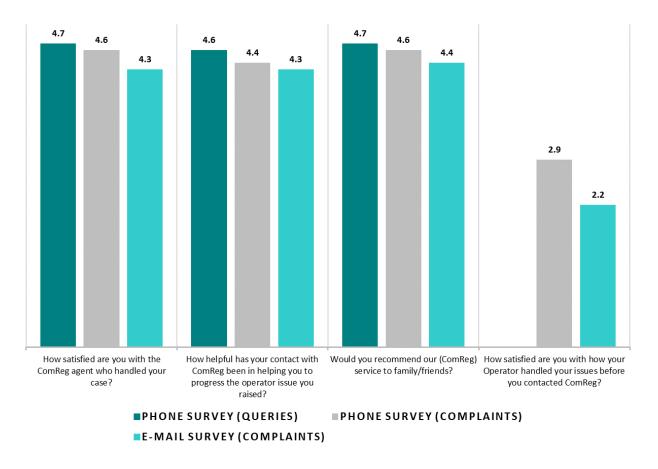


Figure 2: Consumer Care Survey ratings Q3 2022

 $^{^{5}}$ Consumers respond to the questions outlined in Figure 2 by pressing 1 – 5 on their telephone keypad (for telephone surveys), or by selecting a rating of 1 – 5 through a weblink (for e-mail surveys). 1 is the lowest option available to choose, thus expressing dissatisfaction, and 5 is the highest option, expressing satisfaction.

3: Consumer Issues Recorded

3.1 All Issues Recorded

In Q3 2022, ComReg recorded approximately 3,600 issues which are classified across three main categories: ECS, PRS and 'Not for ComReg/Other'. There was a 22% decrease in the total number of issues recorded compared to Q3 2021; ECS issues decreased by 18%, and PRS issues decreased by 82%. Figure 3 shows the trend in number of issues recorded over the last five quarters, which allows for a seasonal comparison of issues recorded in Q3 2021 to Q3 2022.

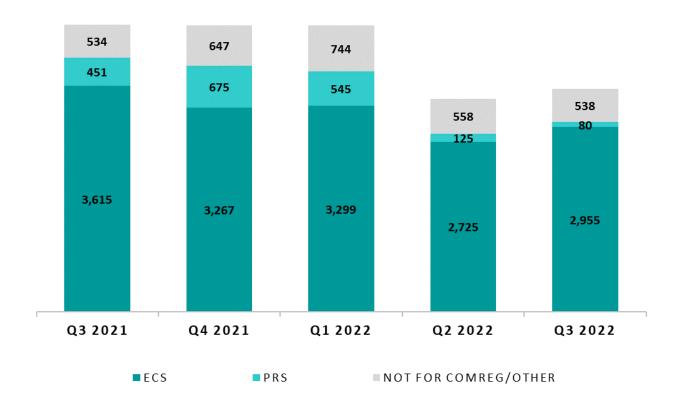


Figure 3: Number of issues recorded Q3 2021 - Q3 2022 by category

In Q3 2022, 83% of all issues recorded were in relation to ECS, while PRS issues and 'Not for ComReg/Other' issues accounted for 2% and 15% of all other issues, respectively. Figure 4 below shows the split of these three category types.

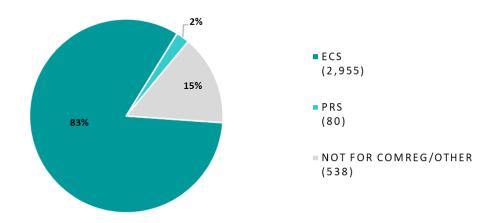


Figure 4: Split of all issues recorded in Q3 2022 by category

3.2 All Issues Recorded by Classification Type⁶

In Q3 2022, approximately 3,600 issues were recorded by ComReg's Consumer Care. The categories ECS and PRS are further split by classification type, which indicate the nature of the issue, such as an ECS Billing Issue. Figure 5 below shows the number of issues recorded for each classification type, comparing Q2 2022 to Q3 2022.

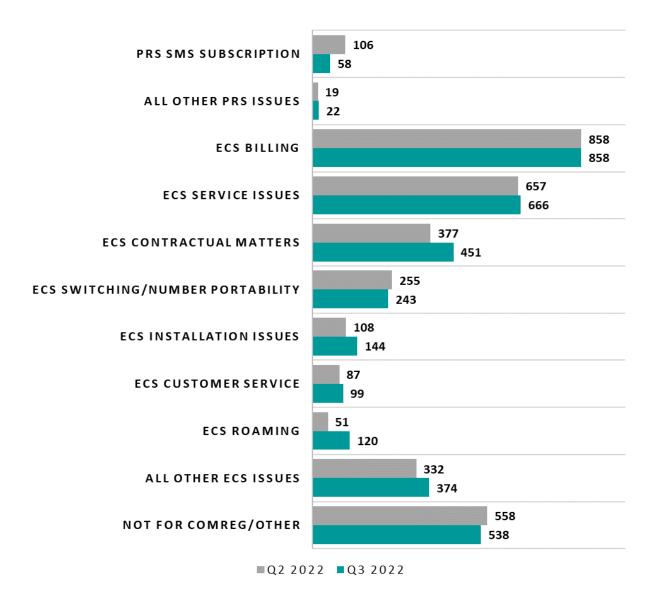


Figure 5: Number of issues recorded by classification type Q2 2022 vs Q3 2022

⁶ See Annex 3 for Classification Type Index and Annex 2 for Mobile Coverage Service Issue details.

3.3 All Issues Recorded by Queries vs Complaints

ComReg's Consumer Care records two types of issues: queries or complaints. In Q3 2022, 91% of all issues recorded were queries, and 9% were complaints. Of the 3,246 queries recorded in Q3 2022, 81% were in relation to ECS and 2% were in relation to PRS. Of the 327 complaints recorded, 99.7% were in relation to ECS and 0.3% were in relation to PRS. For further detail on the highest volume ECS issues recorded, see Figure 11 and Figure 22.

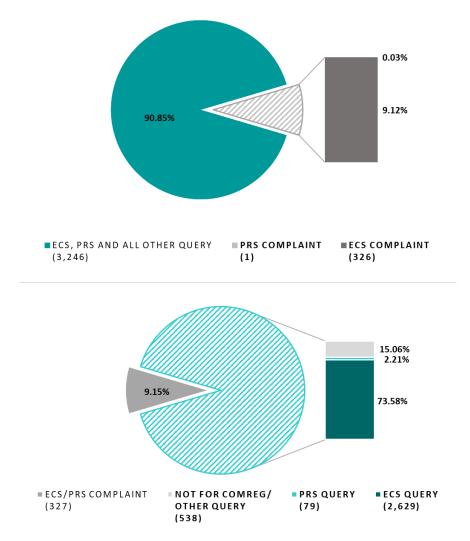


Figure 6: Split of issues recorded by issue type and category Q3 2022

Figure 7 shows the trend of ECS and PRS issues, split by query and complaint, over the last five quarters, which allows for a seasonal comparison of issues recorded in Q3 2021 to Q3 2022. From Q3 2021 to Q3 2022, ECS queries decreased by 12% and PRS queries decreased by 81%; ECS complaints decreased by 48% and PRS complaints decreased by 96%. See Figure 10 and Figure 22 for a breakdown of ECS complaints by classification type.

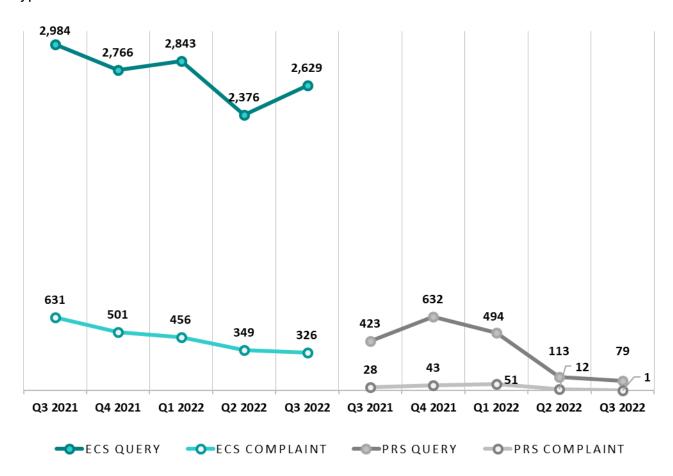


Figure 7: ECS and PRS complaints and queries recorded Q3 2021 - Q3 2022

4: Mobile Service Provider Statistics

4.1 Mobile Service Provider ECS Queries vs Complaints

Figure 8 shows the number of ECS queries and complaints recorded for Eir⁷, 3⁸, Vodafone⁹ and 'Other' Mobile Service Providers¹⁰, comparing Q2 2022 to Q3 2022. The total number of issues recorded for Mobile Service Providers in Q3 2022 was 1,061, a 9% increase compared to Q2 2022, where 972 issues were recorded.

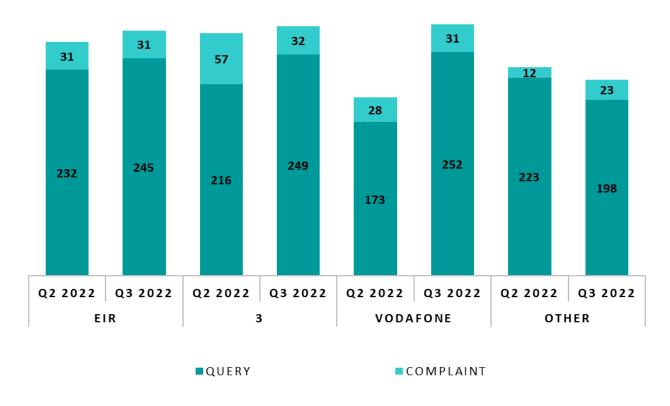


Figure 8: Number of ECS queries and complaints by Mobile Service Provider Q2 2022 vs Q3 2022

⁷ On this chart, issues recorded for GoMo are included in Eir's figures.

⁸ On this chart, issues recorded for 48 are included in 3's figures.

⁹ On this chart, issues recorded for Clear Mobile are included in Vodafone's figures.

¹⁰ 'Other' Mobile Service Providers includes issues recorded for those Mobile Service Providers not named in Figure 8, or where the Mobile Service Provider is not provided by the consumer. This allows a holistic view of issues recorded across all Mobile Service Providers.

Figure 9 shows the split of queries to complaints recorded for each Mobile Service Provider^{7,8,9,10} in Figure 8, including the total industry average, comparing Q2 2022 to Q3 2022. The 'industry average' is based on all issues recorded within each quarter for all Mobile Service Providers.

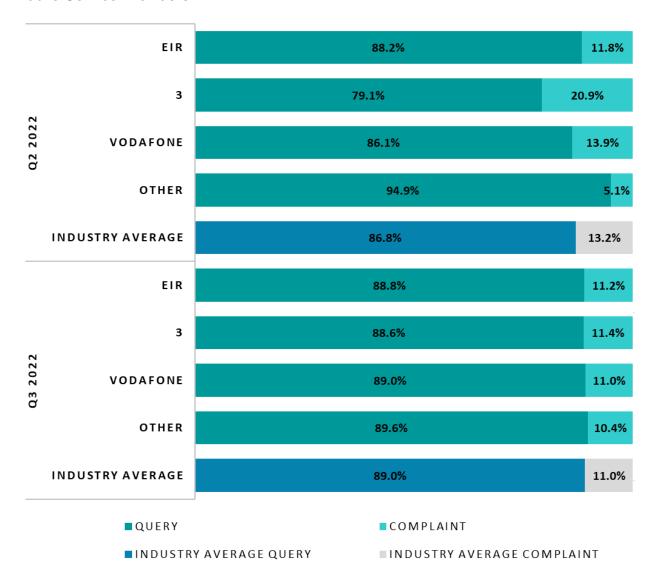
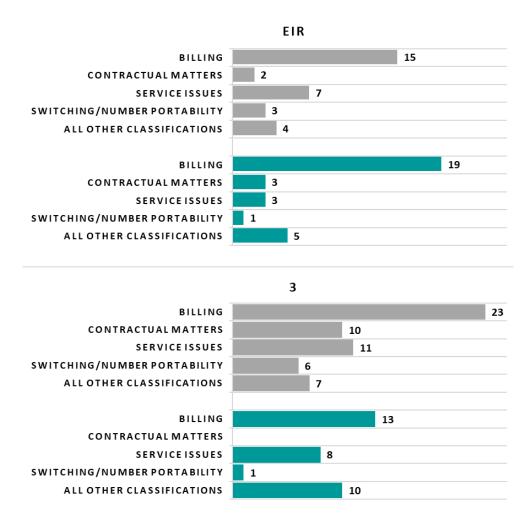


Figure 9: Split of ECS queries and complaints by Mobile Service Provider Q2 2022 vs Q3 2022

4.2 Mobile Service Provider ECS Complaints by Classification Type

Figure 10 shows ECS complaints by classification type for each Mobile Service Provider^{7,8,9} listed in Figure 8, comparing Q2 2022 with Q3 2022. For details of the highest number of issues recorded for each Mobile Service Provider, see Figure 11.



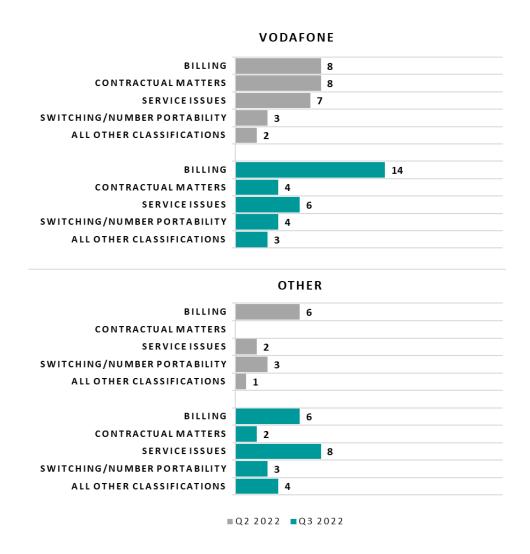


Figure 10: Mobile Service Provider ECS complaints by classification type Q2 2022 vs Q3 2022

4.3 Mobile Service Provider ECS Issues Recorded

The below table shows, in descending order, the highest number of issues recorded for each Mobile Service Provider^{7,8,9} listed in Figure 8, as reported by consumers, comparing Q2 2022 to Q3 2022.

	Number of Issues Q2 2022	Number of Issues Q3 2022
Eir		
Billed more than agreed amount	24	29
Loss of service	38	26
Accessing complaints process - complaints information not on website	11	15
Switching/number portability - delay switching	10	15
Billed after cancellation	16	14
Switching/number portability - number loss		14
Equipment issues - handset	13	12
Billed for service not received	12	11
Refund not received	11	9
Contract termination issues - cancellation procedures		8
3		
Billed more than agreed amount	32	34
Loss of service	9	20
Roaming issue - Outside EU data		17
Mobile coverage	17	16
Roaming issue - Outside EU voice and data		14
Billed after cancellation	14	13
Switching/number portability - delay switching	9	12
Misleading sales		12
Roaming issue - EU data		11
Roaming issue - EU voice and data	12	10

Vodafone		
Billed more than agreed amount	16	33
Loss of service	16	24
Mobile coverage	20	20
Billed after cancellation	9	20
Switching/number portability - unlock code issue	9	14
Misleading sales	8	11
Switching/number portability - delay switching	10	10
Refund not received		10
Billed for service not requested		10
Service issues - intermittent service		10

Figure 11: Highest number of issues recorded by Mobile Service Provider Q2 2022 vs Q3 2022

4.4 Mobile Service Provider ECS Complaints Closed in Q3 2022

Figure 12 shows the number of ECS complaints closed in Q3 2022, for each Mobile Service Provider^{7,8,9} listed in Figure 8, broken down by number of working days open (Monday to Friday, and excluding public holidays). Complaints closed within Q3 2022 may be reopened complaints, and may have been first escalated to a Service Provider in previous quarters.

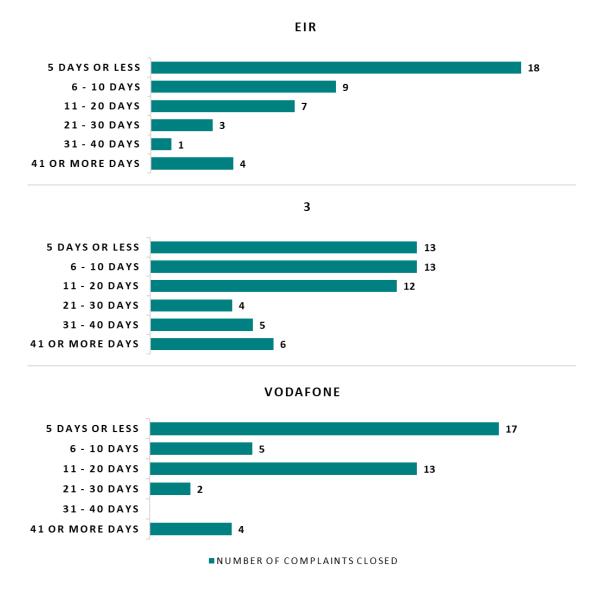


Figure 12: ECS complaints closed in Q3 2022 by Mobile Service Provider and number of working days open

Complaint resolution time is measured in working days, from the date ComReg first escalates the complaint to a Service Provider to the date of complaint closure. Figure 13^{7,8,9,10} shows the median resolution time for ECS complaints in Figure 12, broken down by number of working days open (Monday to Friday, and excluding public holidays), comparing Q2 2022¹¹ to Q3 2022. Complaints closed within Q3 2022 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 July 2022. The 'industry median' is a 'snapshot' based on all complaints closed within each quarter for all Mobile Service Providers.

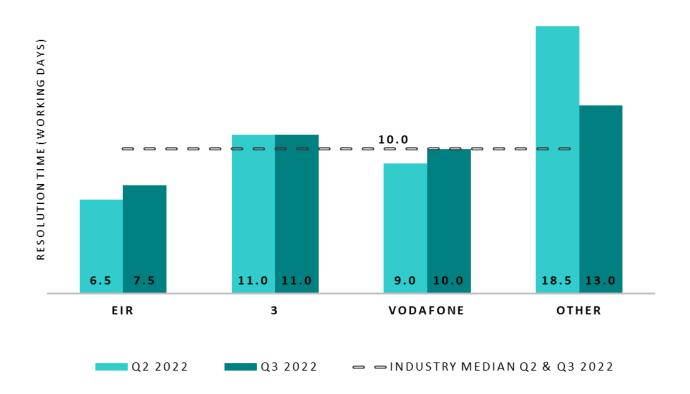


Figure 13: Median complaint resolution time by Mobile Service Provider Q2 2022 vs Q3 2022

¹¹ For details of complaints closed in Q2 2022, see ComReg Consumer Line Statistics Report Q2 2022.

Figure 14^{7,8,9,10} provides a further breakdown of the Q3 2022 complaint resolution time of ECS complaints in Figure 13. In Figure 14, the median resolution time is further broken down by a) complaints closed in 10 days or less, and b) complaints closed within 11 days or more. The 'industry median' is a 'snapshot' based on all complaints closed within the quarter for all Mobile Service Providers.

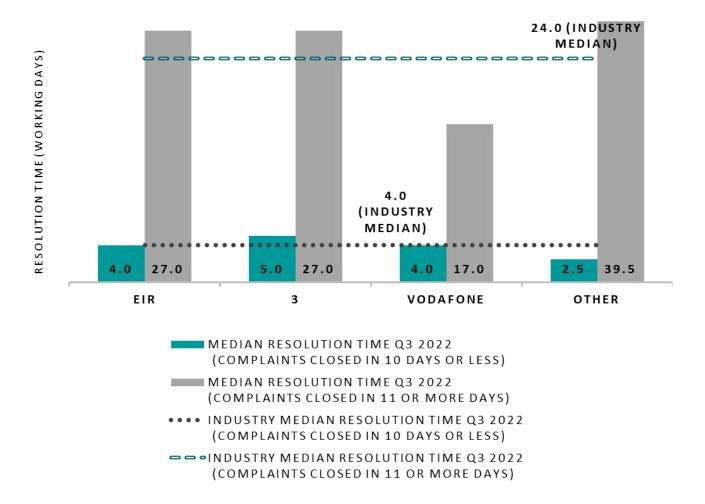


Figure 14: Median complaint resolution time by Mobile Service Provider Q3 2022, complaints closed in 10 days or less vs complaints closed in 11 days or more

Figure 15 below provides the Q3 2022 median resolution time for complaints in Figure 13, split by Service Provider^{7,8,9,10} and by complaint classification type. For further detail on complaints recorded by Service Provider and classification type, see Figure 10.

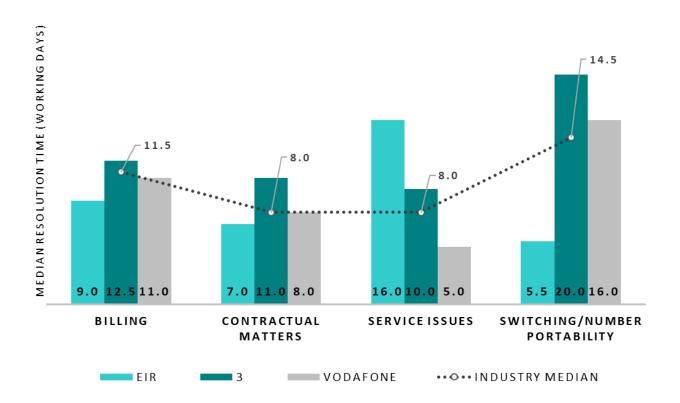


Figure 15: Median complaint resolution time by classification type and Mobile Service Provider Q3 2022

4.5 Mobile Service Provider ECS Complaints Open at 30 September 2022

Figure 16 shows the number ECS complaints open at 30 September 2022, for each Mobile Service Provider^{7,8,9} listed in Figure 8, broken down by the number of working days elapsed since they were first escalated to the Service Provider.

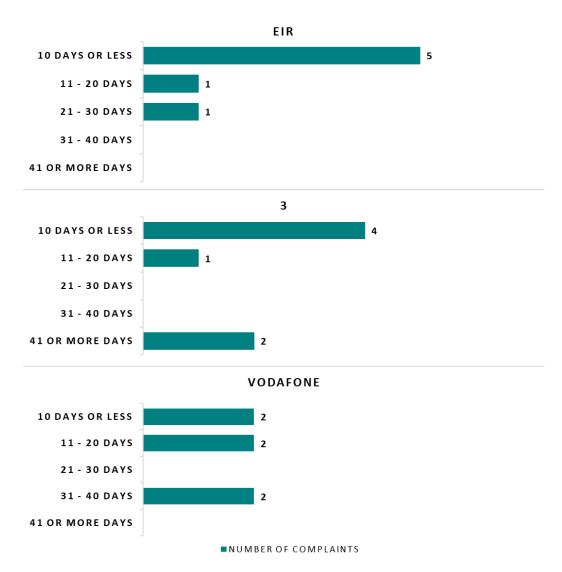


Figure 16: Mobile Service Provider ECS complaints open at 30 September 2022 by number of working days since first escalation

4.6 Mobile Service Provider ECS Complaints per 100,000 Subscribers

Figure 17 below shows the average number of complaints per 100,000 subscribers for each Mobile Service Provider^{7,8,9} listed in Figure 8 and the total industry average, comparing Q2 2022 to Q3 2022. The 'industry average' is a 'snapshot' based on complaints received for all Mobile Service Providers.

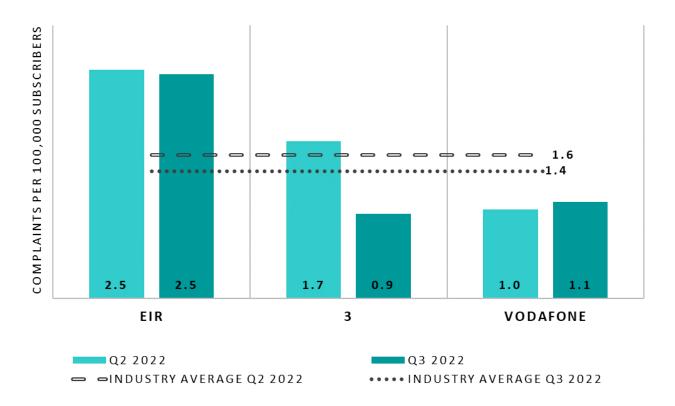


Figure 17: ECS complaints per 100,000 subscribers by Mobile Service Provider Q2 2022 vs Q3 2022

4.7 Mobile Service Provider PRS Issues

PRS texts are sent to five-digit short codes beginning with the number 5 (e.g. 57XXX), and texts to PRS typically cost more than ordinary texts, depending on the prefix number or short code. Figure 18 below shows the number of PRS issues raised with ComReg's Consumer Care in Q3 2022 split by short code and premium rate service provider¹² (where the total number of issues recorded for the short code during the quarter is greater than 40 issues) and further split by Mobile Service Provider (where the total number of issues recorded for the Mobile Service Provider is greater than 40 issues).

Network Operator	Short Code and Premium Rate Service Provider		
	Other	Total	
Other	80	80	
Total	80	80	

Figure 18: Number of PRS issues recorded by PRS short code, premium rate service provider and Mobile Service Provider Q3 2022

¹² http://www.irishstatutebook.ie/eli/2010/act/2/enacted/en/print, Section 3.

[&]quot;premium rate service provider" means a person who does any or all of the following, for gain: (a) provides the contents of a premium rate service, (b) exercises editorial control over the contents of a premium rate service,

⁽c) packages together the contents of a premium rate service for the purpose of facilitating its provision,

⁽d) makes available a facility as part of a premium rate service,

⁽e) transfers a premium rate service from a content provider to one or more electronic communications networks, or

⁽f) provides the electronic communications service over which a premium rate service is provided, or provides the electronic communications network over which a premium rate service is transmitted.

Figure 19 shows the average number of PRS issues recorded (rounded to one decimal place) per 100,000 subscribers for each Mobile Service Provider listed in Figure 18 and the total industry average, comparing Q2 2022² to Q3 2022. The 'industry average' is based on all PRS issues recorded for all Mobile Service Providers within each quarter.

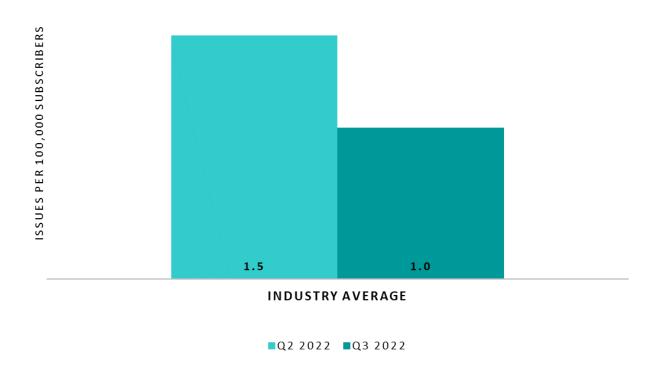


Figure 19: PRS issues by ECS Provider per 100,000 subscribers Q2 2022 vs Q3 2022

5: Fixed Service Provider Statistics

5.1 Fixed Service Provider ECS Queries vs Complaints

Figure 20 shows the number of ECS queries and complaints recorded for Eir, Sky, Virgin Media, Vodafone, and all 'Other' Fixed Service Providers, comparing Q2 2022 to Q3 2022. The total number of issues recorded for Fixed Service Providers in Q3 2022 was 1,753, a 7% decrease compared to Q2 2022, where 1,894 issues were recorded.

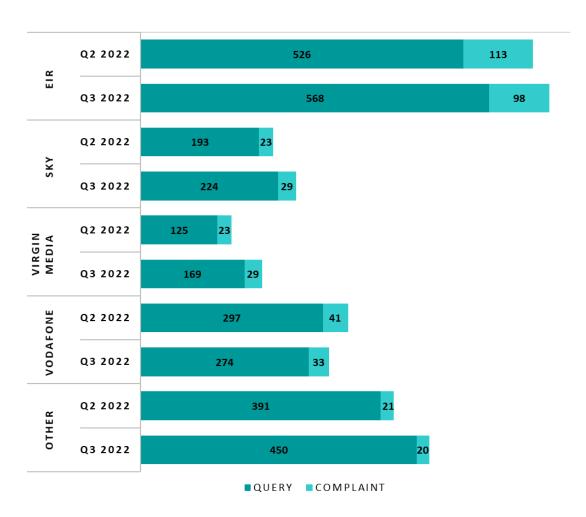


Figure 20: Number of ECS issues queries and complaints by Fixed Service Provider Q2 2022 vs Q3 2022

¹³ 'Other' Fixed Service Providers includes issues recorded for those Fixed Service Providers not named in Figure 20, or where the Fixed Service Provider is not provided by the consumer. This allows a holistic view of issues recorded across all Fixed Service Providers.

Figure 21 shows the split of queries to complaints recorded for Eir, Sky, Virgin Media and Vodafone, including the total industry average comparing Q2 2022 to Q3 2022. The 'industry average' is based on all issues recorded within each quarter for all Fixed Service Providers.

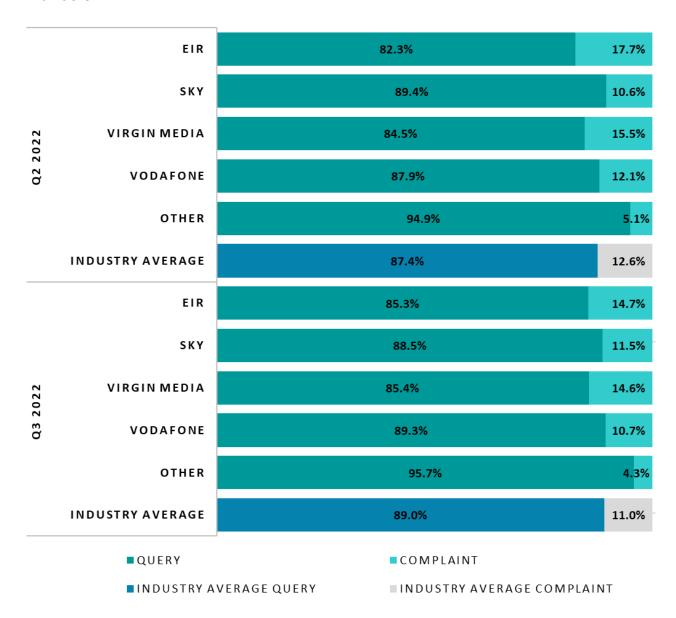
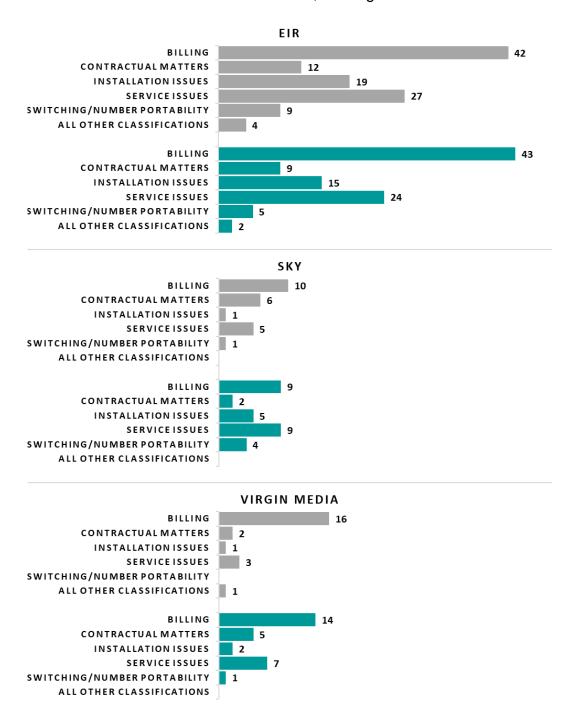


Figure 21: Split of ECS queries and complaints by Fixed Service Provider Q2 2022 vs Q3 2022

5.2 Fixed Service Provider ECS Complaints by Classification Type

Figure 22 shows ECS complaints by classification type for each Fixed Service Provider listed in Figure 20, comparing Q2 2022 with Q3 2022. For details of the highest number of issues recorded for each Fixed Service Provider, see Figure 23.



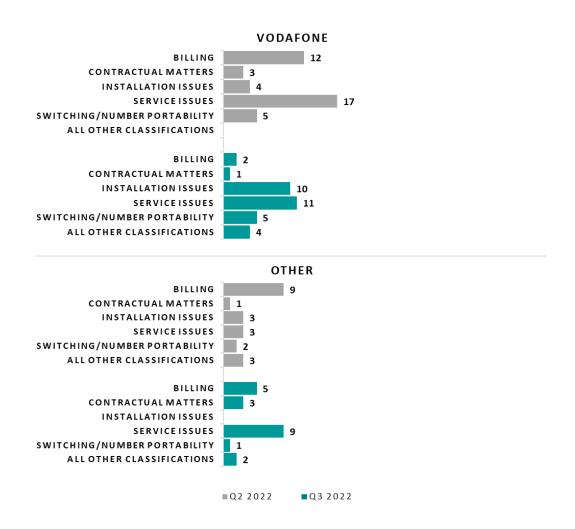


Figure 22: Fixed Service Provider ECS complaints by classification type Q2 2022 vs Q3 2022

5.3 Fixed Service Provider ECS Issues Recorded

The below table shows, in descending order, the highest number of ECS issues recorded for each Fixed Service Provider listed in Figure 20, as reported by consumers, comparing Q2 2022 to Q3 2022.

	Number of Issues Q2 2022	Number of Issues Q3 2022
Eir		
Billed after cancellation	82	74
Loss of service	72	70
Billed more than agreed amount	48	69
Delay in installation	57	53
Contract change notification - pricing transparency		50
Service availability	37	47
Refund not received	32	32
Switching/number portability - number loss	20	26
Pricing transparency		21
Contract termination issues - cancellation procedures	25	18
Sky		
Loss of service	25	37
Billed more than agreed amount	11	25
Delay in installation	8	25
Contract termination issues - cancellation procedures	24	23
Billed after cancellation	33	17
Service availability		15
Double billed	14	11
Service issues - intermittent service	8	11
Accessing complaints process - complaints information not on website	10	9
Pricing transparency		9

Virgin Media		
Billed more than agreed amount	20	35
Billed after cancellation	18	25
Contract termination issues - cancellation procedures	10	15
Loss of service	6	14
Service issues - intermittent service	7	11
Service availability	11	10
Pricing transparency	9	9
Misleading sales		6
Refund not received	5	5
Contract termination issues - cancellation outside minimum term		5
Vodafone		
Loss of service	69	49
Billed after cancellation	45	37
Delay in installation	15	33
Switching/number portability - UAN/CRN issue		21
Service availability	17	18
Service issues - intermittent service	19	17
Billed more than agreed amount	25	11
Double billed	19	11
Switching/number portability - number loss	14	10
Contract termination issues - cancellation procedures		9

Figure 23: Highest number of issues recorded by Fixed Service Provider Q2 2022 vs Q3 2022

5.4 Fixed Service Provider ECS Complaints Closed in Q3 2022

Figure 24 below shows ECS complaints closed in Q3 2022, for each Fixed Service Provider listed in Figure 20, broken down by number of working days. Complaints closed within Q3 2022 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

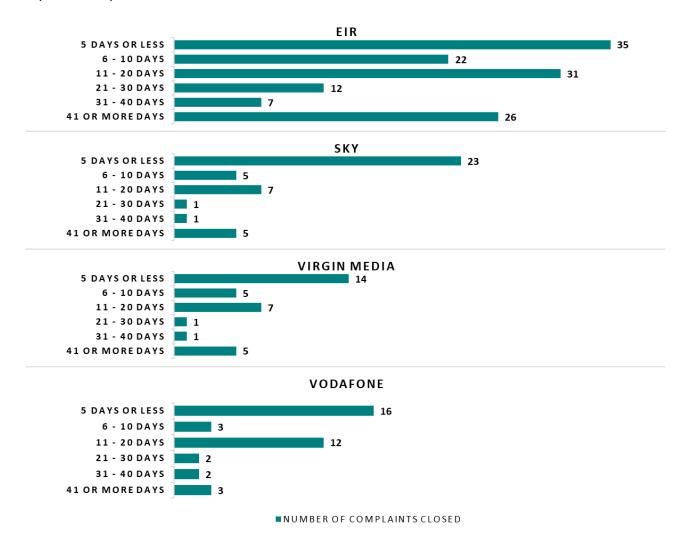


Figure 24: Fixed Service Provider ECS complaints closed in Q3 2022 by number of working days open

Complaint resolution time is measured in working days, from the date ComReg first escalates the complaint to a Service Provider to the date of complaint closure. Figure 25 shows the median resolution time for ECS complaints in Figure 23, broken down by number of working days open (Monday to Friday, and excluding public holidays), comparing Q2 2022¹¹ to Q3 2022. Complaints closed within Q3 2022 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 July 2022. The 'industry median' is a 'snapshot' based on all complaints closed within each quarter for all Fixed Service Providers.

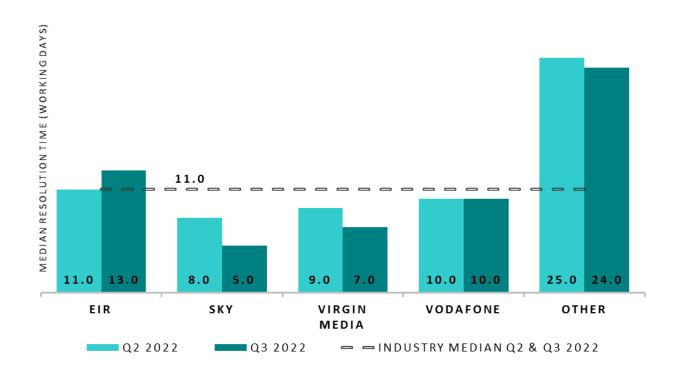


Figure 25: Median complaint resolution time by Fixed Service Provider Q2 2022 vs Q3 2022

Figure 26 provides a further breakdown of the Q3 2022 complaint resolution time of ECS complaints in Figure 25. In Figure 26, the median resolution time is further broken down by a) complaints closed in 10 days or less, and b) complaints closed within 11 days or more. The 'industry median' is a 'snapshot' based on all complaints closed within the quarter for all Fixed Service Providers.

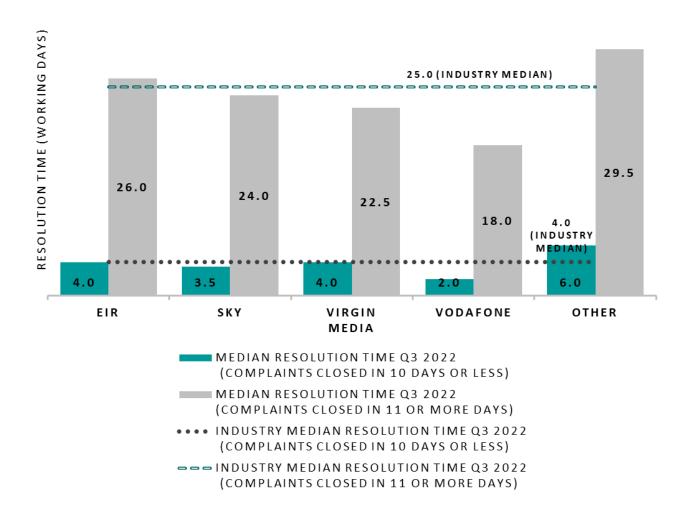


Figure 26: Median complaint resolution time by Fixed Service Provider Q3 2022, complaints closed in 10 days or less versus complaints closed in 11 days or more

Figure 27 below provides the Q3 2022 median resolution time for complaints in Figure 25, split by Service Provider and by complaint classification type. For further detail on complaints recorded by Service Provider and classification type, see Figure 22.

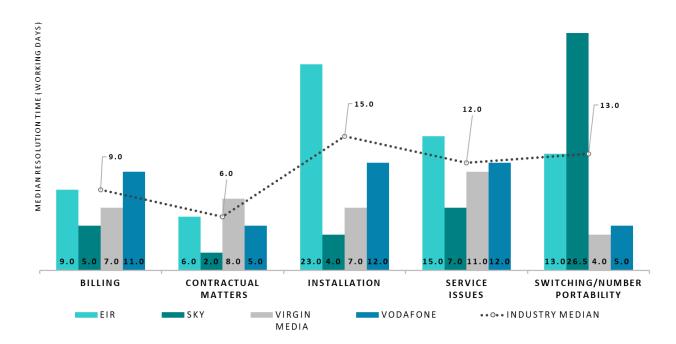


Figure 27: Median complaint resolution time by classification type and Fixed Service Provider Q3 2022

5.5 Fixed Service Provider ECS Complaints Open at 30 September 2022

Figure 28 shows the number of ECS complaints open at 30 September 2022, for each Fixed Service Provider listed in Figure 19, broken down by number of working days elapsed since they were first escalated to the Service Provider.

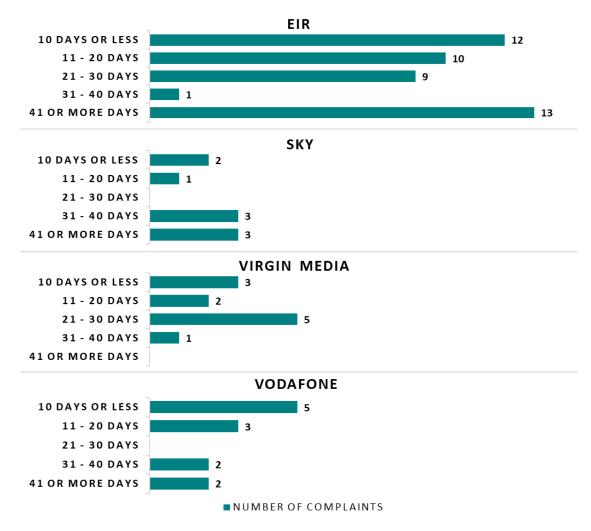


Figure 28: Fixed Service Provider ECS complaints open at 30 September 2022 by number of working days since first escalation

5.6 Fixed Service Provider ECS Complaints per 100,000 Lines¹⁴

Figure 29 below shows the average complaint rate per 100,000 fixed voice lines (as reported by Service Providers to ComReg) for each Fixed Service Provider listed in Figure 20 and the total industry average. The 'industry average' is a 'snapshot' based on complaints received for all Fixed Service Providers.

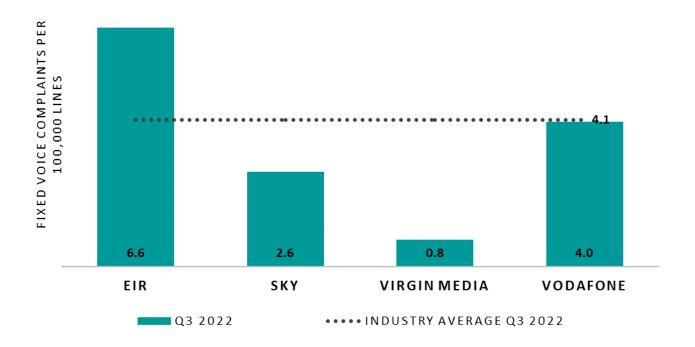


Figure 29: ECS voice complaints per 100,000 voice lines by Fixed Service Provider Q3 2022

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¹⁴ From Q3 2022, ComReg's Consumer Care Statistics Report has replaced 'ECS Fixed Voice Complaints per 100,000 Subscribers' with 'ECS Fixed Voice Complaints per 100,000 Lines' and 'ECS Fixed Broadband Complaints per 100,000 Lines'. This metric has been updated to more accurately reflect the complaint rates in the evolving Fixed market.

Figure 30 below shows the average complaint rate per 100,000 broadband lines¹⁴ (as reported by Service Providers to ComReg) for each Fixed Service Provider listed in Figure 20 and the total industry average. The 'industry average' is a 'snapshot' based on complaints received for all Fixed Service Providers.

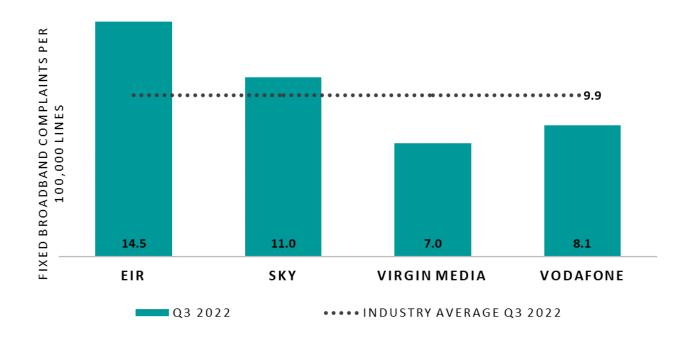
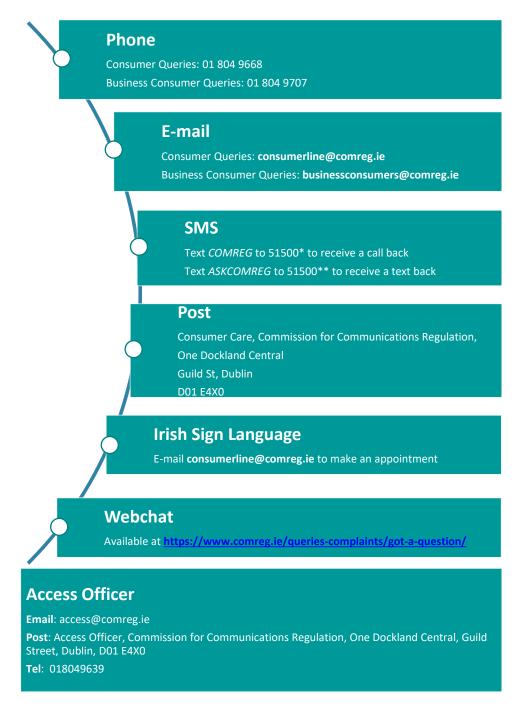


Figure 30: ECS fixed broadband complaints per 100,000 lines by Fixed Service Provider Q3 2022

Annex 1: ComReg Consumer Care Contact Details



^{*}The message will be charged at the standard text rate. If you have any problems with the service, please let us know at 01 804 9668. **Please outline the issue you need assistance with and we will respond to you by text. Please use keyword ASKCOMREG in all text messages, including replies.

Annex 2: Mobile Coverage Statistics

Figure 31 below shows the number of mobile coverage issues versus all other service issues (as reported by consumers) for each Mobile Service Provider^{7,8,9,10} listed in Figure 8, comparing Q2 2022 to Q3 2022.

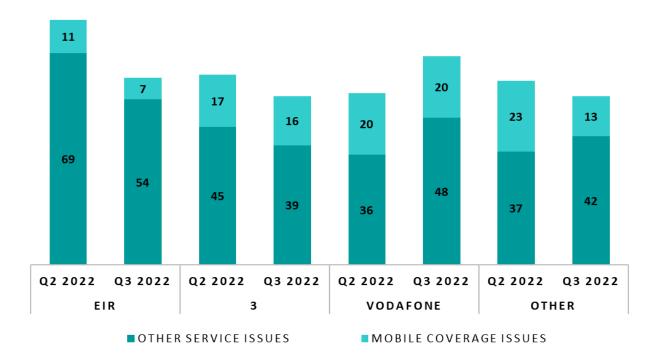
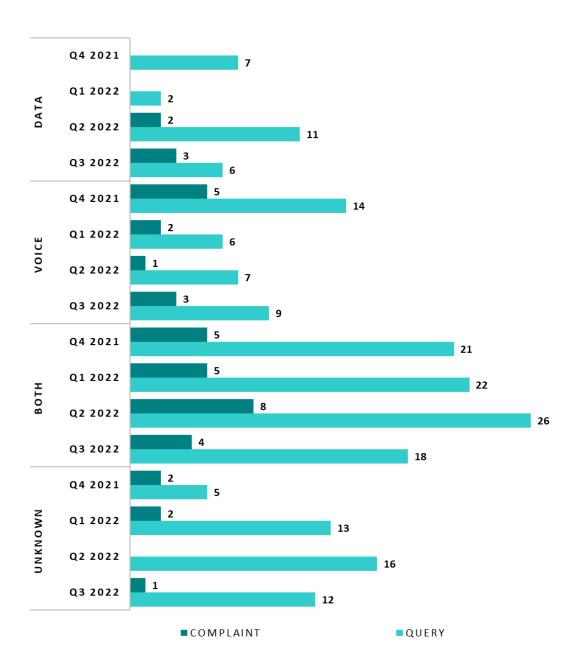


Figure 31: Number of ECS service issues by Mobile Service Provider Q2 2022 vs Q3 2022



*Unknown refers to contacts from consumers (by email) where relevant information pertaining to type or frequency has not been provided

Figure 32: Mobile Coverage Issues by Type Q4 2021 - Q3 2022

Figure 33 shows the average number of mobile coverage issues recorded per 100,000 subscribers for each Mobile Service Provider^{7,8,9,10} listed in Figure 8. The 'industry average' is based on mobile coverage issues recorded for all Mobile Service Providers within each quarter.

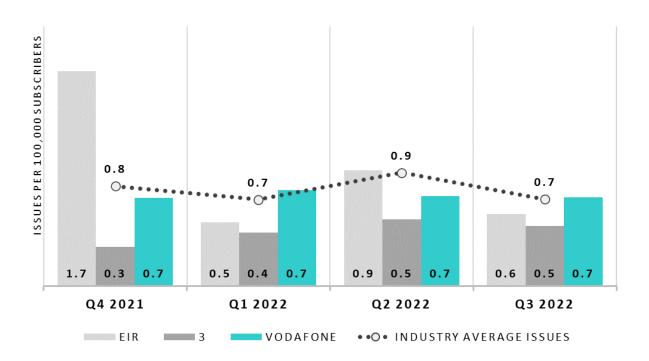


Figure 33: Mobile Coverage issues (per 100,000 Subscribers) Q4 2021 - Q3 2022

Annex 3: Classification Type Index

This Classification Type Index reflects the classification and sub-classification types¹⁵ relevant to highest volume issues recorded in Q3 2022¹⁶.

Billing includes:

Billed after cancellation

Billed for service not received

Billed for service not requested

Billed more than agreed amount

Double billed

Refund not received

Contractual Matters includes:

Contract change notification - pricing transparency

Contract termination issues - cancellation outside minimum term

Contract termination issues - cancellation procedures

Misleading sales

Pricing transparency

Customer Service includes:

Accessing complaints process - complaints information not on website

Installation Issues includes:

Delay in installation

Roaming includes:

Roaming issue - EU data

Roaming issue - EU voice and data

Roaming issue - Outside EU data

Roaming issue - Outside EU voice and data

Service Issues includes:

Equipment issues - handset

Loss of service

Mobile coverage

Service availability

Service issues - intermittent service

Switching/Number Portability Issues includes:

Delay switching

Number loss

UAN/CRN issue

Unlock code issue

¹⁵ Sub-classification types may vary each quarter based on the nature of issues reported by consumers.

¹⁶ For detail on classification and sub-classification types relevant to highest volume issues recorded in Q2 2022, see ComReg Consumer Line Statistics Report Q2 2022.

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