

ComReg Consumer Line Statistics Report

Q2 2022 – 1 April to 30 June 2022

Information Notice

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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 publication includes information on issues raised by service providers' customers and recorded by ComReg in Q2 2022^{1,2}.

In Q2 2022, ComReg's Consumer Care team recorded approximately 9,600 contacts and 3,400 issues. In Q1 2022, 4,600 issues were recorded, and approximately 12,400 consumer contacts were received. ComReg's Consumer Care team managed approximately 2,900 Service Provider contacts during Q1 2022 and 2,300 Service Provider contacts during Q2 2022. 89% of all issues recorded were queries and 11% of all issues were complaints. 80% of all issues recorded relate to ECS, 4% relate to PRS, and 16% relate to 'Not for ComReg'/Other. There was a 22% decrease in the total number of issues recorded compared to Q2 2022; ECS issues decreased by 23%, and PRS issues decreased by 61%.

In Q2 2022, ComReg's Consumer Care team recorded 263 Mobile Service Provider issues for Eir. 273 issues were recorded for 3. 201 issues were recorded for Vodafone. The median resolution time for Mobile Service Provider complaints was 10.0 working days, compared to 8.0 working days in Q1 2022. The average number of complaints per 100,000 subscribers was 1.6, compared to an average of 2.2 complaints per 100,000 subscribers in Q1 2022.

In Q2 2022, ComReg's Consumer Care team recorded 639 Fixed Service Provider issues for Eir. 216 issues were recorded for Sky. 148 issues were recorded for Virgin Media. 338 issues were recorded for Vodafone. The median resolution time for Fixed Service Provider complaints was 11.0 working days, compared to 9.0 working days in Q1 2022. The average number of complaints per 100,000 subscribers was 17.4, compared to an average of 21.6 complaints per 100,000 subscribers in Q1 2022.

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¹ 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.

² ECS providers are referred to in this report as per their trading name on the ComReg Service Register.

2: Consumer Line Overview

2.1 Consumer Line Contacts

In Q2 2022, approximately 9,600 consumer contacts were received by ComReg's Consumer Line. ComReg's Consumer Line 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 channel³ over the last five quarters. In Q2 2022, phone and e-mail/online form continued to be the most popular methods of contact. ComReg's Consumer Line received approximately 2,300 service provider contacts in Q2 2022.

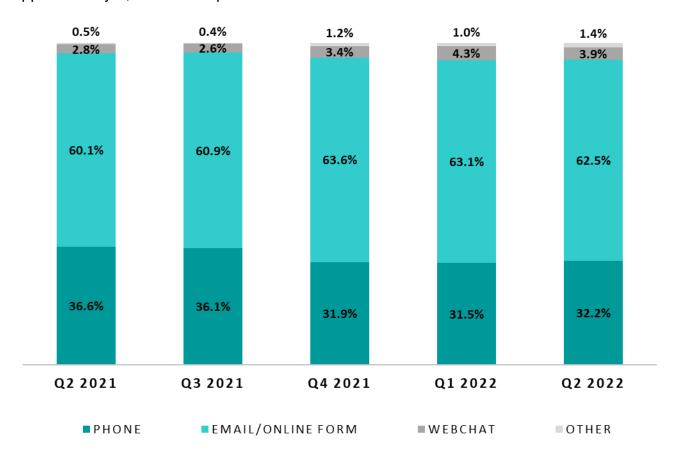


Figure 1: Split of contacts to ComReg's Consumer Line by channel Q2 2021 - Q2 2022

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³ The contact channel 'Other' includes contacts received by letter and SMS. For further details on ComReg's Consumer Line contact channels, see Annex 1.

2.2 Consumer Line Survey

Consumers who contact ComReg's Consumer Line 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 5⁴.

In Q2 2022, consumers completed 411 phone surveys in relation to queries, 354 phone surveys in relation to complaints, and 121 e-mail surveys in relation to complaints. Figure 2 below outlines the questions contained in the survey and the average ratings received in Q2 2022.

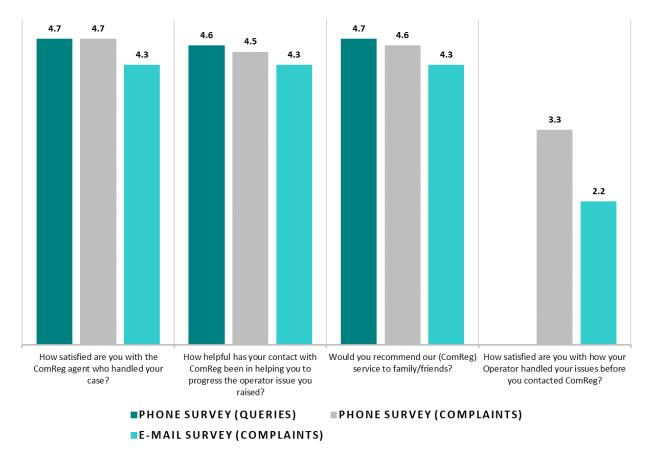


Figure 2: Consumer Line Survey ratings Q2 2022

 $^{^4}$ 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 Q2 2022, ComReg recorded approximately 3,400 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 Q2 2021; ECS issues decreased by 23%, and PRS issues decreased by 61%. 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 Q2 2021 to Q2 2022.

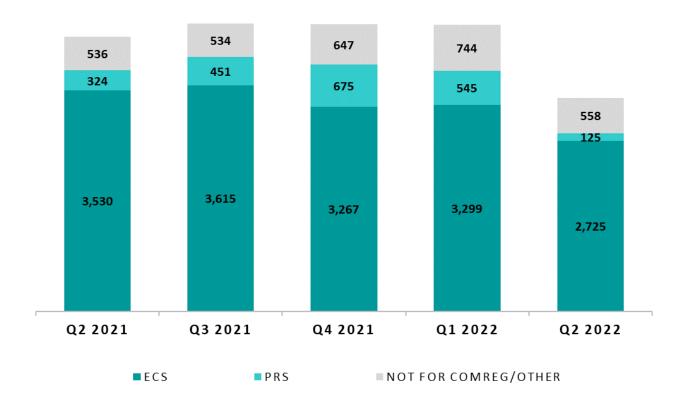


Figure 3: Number of issues recorded Q2 2021 - Q2 2022 by category

In Q2 2022, 80% of all issues recorded were in relation to ECS, while PRS issues and 'Not for ComReg/Other' issues accounted for 4% and 16% of all other issues, respectively. Figure 4 below shows the split of these three category types.

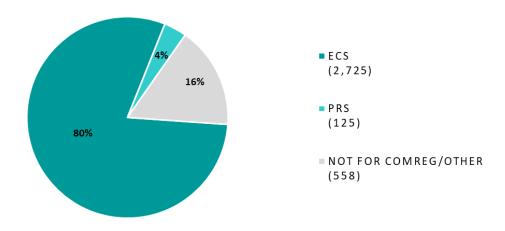


Figure 4: Split of all issues recorded in Q2 2022 by category

3.2 All Issues Recorded by Classification Type⁵

In Q2 2022, approximately 3,400 issues were recorded by ComReg's Consumer Line. 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 Q1 2022 to Q2 2022.

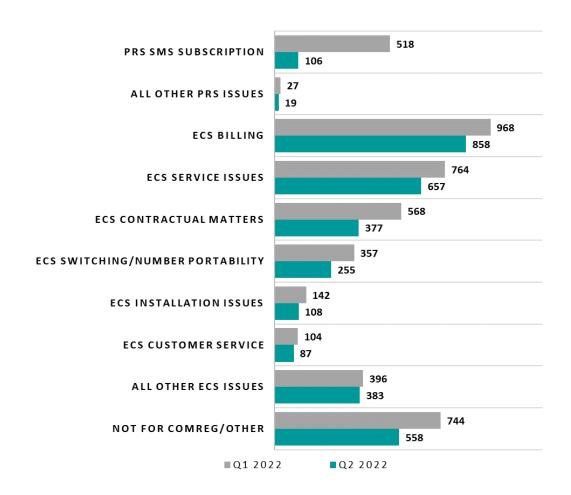


Figure 5: Number of issues recorded by classification type Q1 2022 vs Q2 2022

⁵ 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 Line records two types of issues: queries or complaints. In Q2 2022, 89% of all issues recorded were queries, and 11% were complaints. Of the 3,047 queries recorded in Q2 2022, 78% were in relation to ECS and 4% were in relation to PRS. Of the 361 complaints recorded, 97% were in relation to ECS and 3% were in relation to PRS. For further detail on the highest volume ECS issues recorded, see Figure 11 and Figure 22.

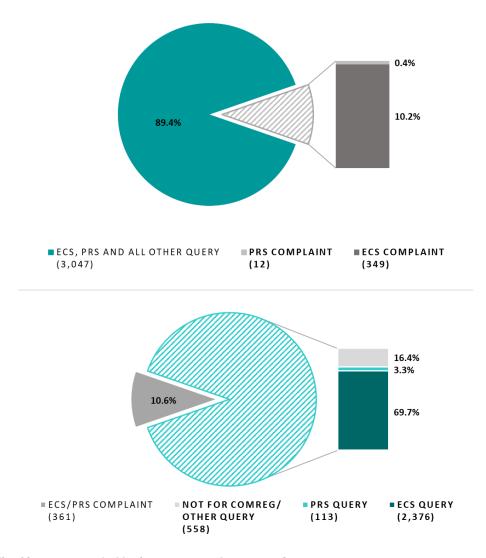


Figure 6: Split of issues recorded by issue type and category Q2 2022

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 Q2 2021 to Q2 2022. From Q2 2021 to Q2 2022, ECS queries decreased by 17% and PRS queries decreased by 61%; ECS complaints decreased by 47% and PRS complaints decreased by 67%. See Figure 18 for detail on PRS issues by ECS Provider and short code. See Figure 10 and Figure 22 for a breakdown of ECS complaints by classification type.

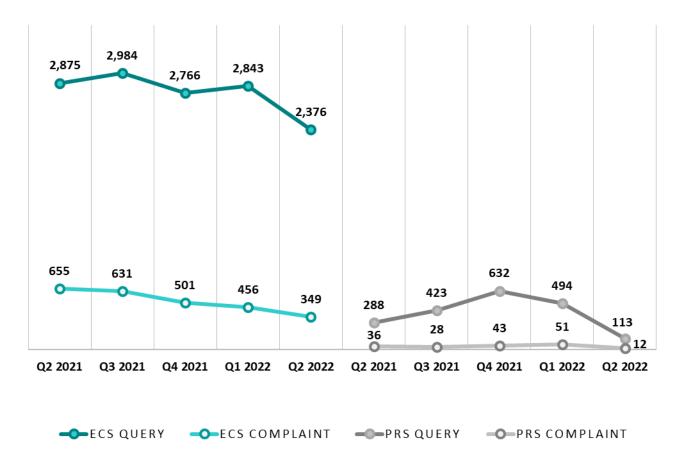


Figure 7: ECS and PRS complaints and queries recorded Q2 2021 - Q2 2022

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 Eir⁶, 3⁷, Vodafone⁸ and 'Other' Mobile Service Providers⁹, comparing Q1 2022 to Q2 2022. The total number of issues recorded for Mobile Service Providers in Q2 2022 was 972, an 11% decrease compared to Q1 2022, where 1,089 issues were recorded.

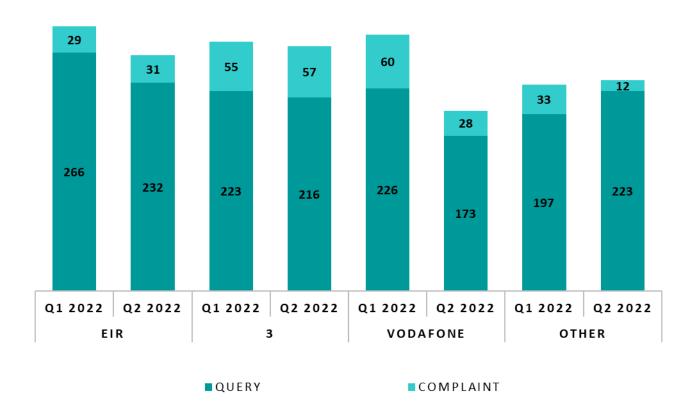


Figure 8: Number of ECS queries and complaints by Mobile Service Provider Q1 2022 vs Q2 2022

⁶ On this chart, issues recorded for GoMo are included in Eir's figures.

⁷ On this chart, issues recorded for 48 are included in 3's figures.

⁸ On this chart, issues recorded for Clear Mobile are included in Vodafone's figures.

⁹ '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^{6,7,8,9} in Figure 8, including the total industry average, comparing Q1 2022 to Q2 2022. The 'industry average' is based on all issues recorded within each quarter for all Mobile Service Providers.

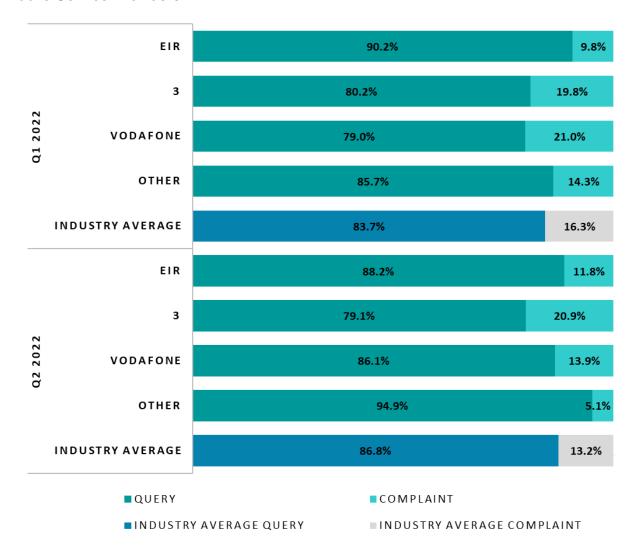
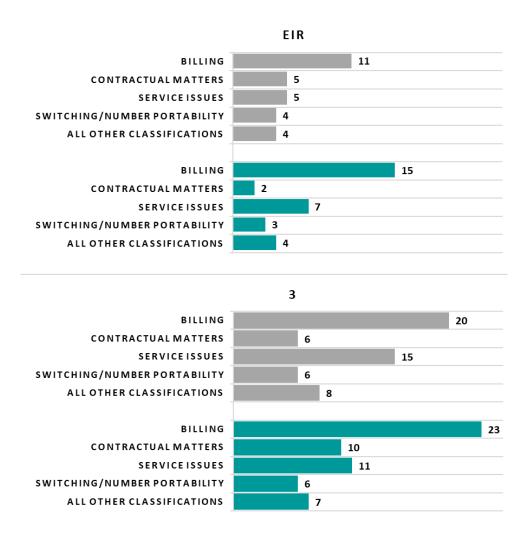


Figure 9: Split of ECS queries and complaints by Mobile Service Provider Q1 2022 vs Q2 2022

4.2 Mobile Service Provider ECS Complaints by Classification Type

Figure 10 shows ECS complaints by classification type for each Mobile Service Provider^{6,7,8,9} listed in Figure 8, comparing Q1 2022 with Q2 2022. For details of the highest number of issues recorded for each Mobile Service Provider, see Figure 11.



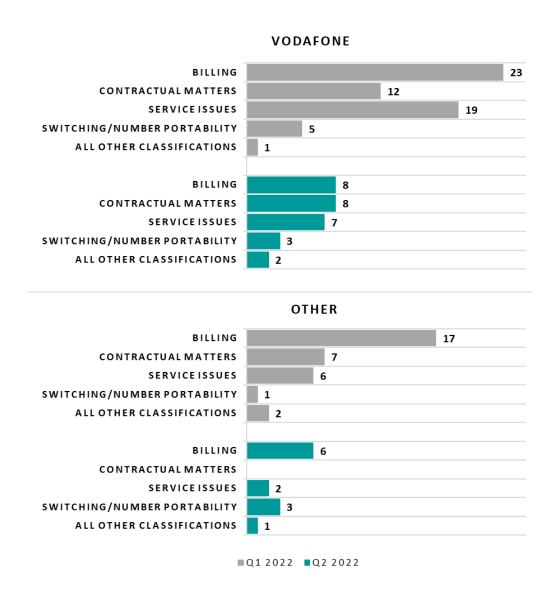


Figure 10: Mobile Service Provider ECS complaints by classification type Q1 2022 vs Q2 2022

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^{6,7,8} listed in Figure 8, as reported by consumers, comparing Q1 2022 to Q2 2022.

	Number of Issues Q1 2022	Number of Issues Q2 2022
Eir		
Loss of service	26	38
Billed more than agreed amount	29	24
Billed after cancellation	13	16
Equipment issues - handset	13	13
Billed for service not received		12
Service availability		12
Accessing complaints process - complaints information not on website	13	11
Refund not received	11	11
Mobile coverage		11
Switching/number portability - delay switching	23	10
3		
Billed more than agreed amount	36	32
Mobile coverage	13	17
Service issues - intermittent service		15
Billed after cancellation	10	14
Switching/number portability - unlock code issue	13	13
Roaming issue - EU voice and data		12
Equipment issues - handset	9	11
Refund not received	9	11
Loss of service	17	9
Switching/number portability - delay switching	12	9

Vodafone		
Mobile coverage	21	20
Billed more than agreed amount	27	16
Loss of service	26	16
Switching/number portability - delay switching	11	10
Switching/number portability - unlock code issue	22	9
Billed after cancellation	15	9
Misleading sales	18	8
Equipment issues - handset	14	7
Service availability		7
Pricing transparency		7

Figure 11: Highest number of issues recorded by Mobile Service Provider Q1 2022 vs Q2 2022

4.4 Mobile Service Provider ECS Complaints Closed in Q2 2022

Figure 12 shows the number of ECS complaints closed in Q2 2022, for each Mobile Service Provider^{6,7,8} listed in Figure 8, broken down by number of working days open (Monday to Friday, and excluding public holidays). Complaints closed within Q2 2022 may be reopened complaints, and may have been first escalated to a Service Provider in previous quarters.

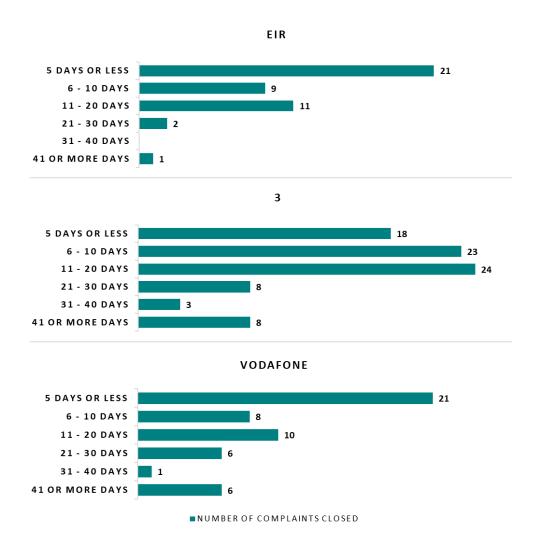


Figure 12: ECS complaints closed in Q2 2022 by Mobile Service Provider and number of working days open

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^{6,7,8,9} 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 Q1 2022¹⁰ to Q2 2022. Complaints closed within Q2 2022 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 April 2022. The 'industry median' is a 'snapshot' based on all complaints closed within each quarter for all Mobile Service Providers.

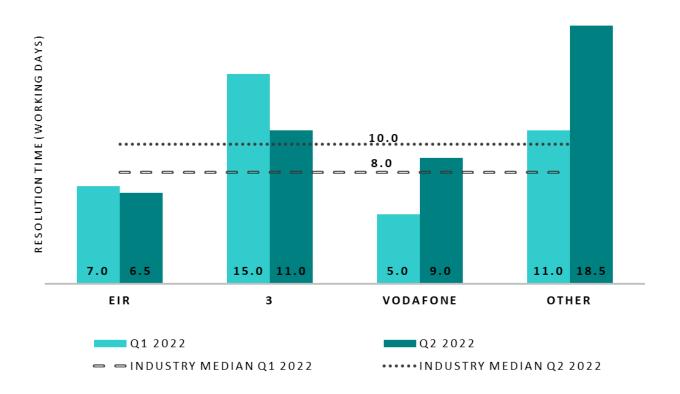


Figure 13: Median complaint resolution time by Mobile Service Provider Q1 2022 vs Q2 2022

¹⁰ For details of complaints closed in Q1 2022, see ComReg Consumer Line Statistics Report Q1 2022.

Figure 14^{6,7,8,9} provides a further breakdown of the Q2 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 Q2 2022, complaints closed in 10 days or less vs complaints closed in 11 days or more

Figure 15 below provides the Q2 2022 median resolution time for complaints in Figure 13, split by Service Provider^{6,7,8} and by complaint classification type. For further detail on complaints recorded by Service Provider and classification type, see Figure 10.

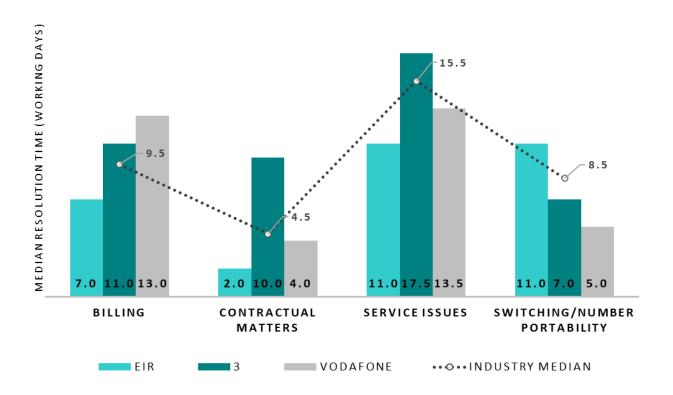


Figure 15: Median complaint resolution time by classification type and Mobile Service Provider Q2 2022

4.5 Mobile Service Provider ECS Complaints Open at 30 June 2022

Figure 16 shows the number ECS complaints open at 30 June 2022, for each Mobile Service Provider^{6,7,8} listed in Figure 8, broken down by the number of working days elapsed since they were first escalated to the Service Provider.

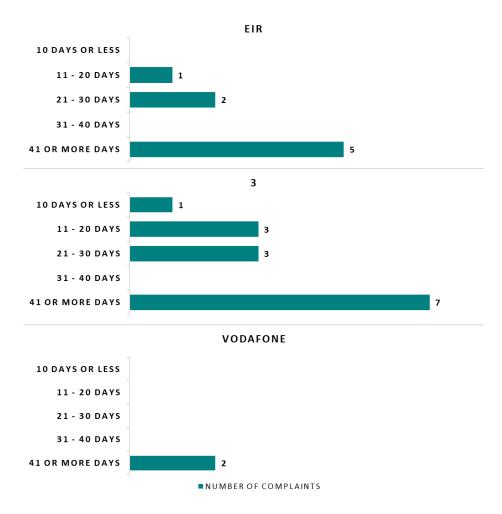


Figure 16: Mobile Service Provider ECS complaints open at 30 June 2022 by number of working days since first escalation

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^{6,7,8} listed in Figure 8 and the total industry average, comparing Q1 2022 to Q2 2022. The 'industry average' is a 'snapshot' based on complaints received for all Mobile Service Providers.

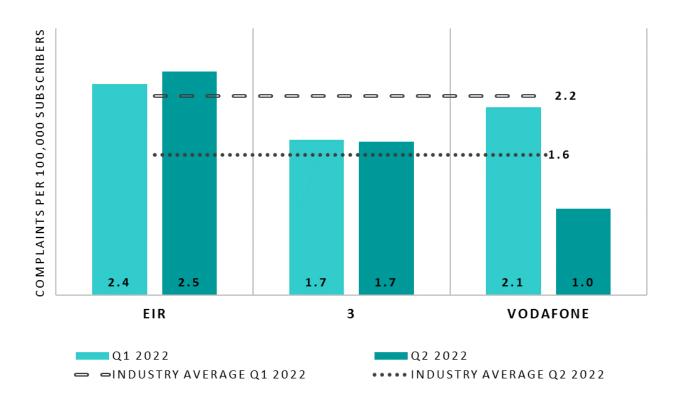


Figure 17: ECS complaints per 100,000 subscribers by Mobile Service Provider Q1 2022 vs Q2 2022

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 Line in Q2 2022 split by short code and premium rate service provider¹¹ (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 Provider⁶ (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			
	57976 (txtNation Ltd)	Other	Total	
Eir	31	21	52	
Other	31	42	73	
Total	62	63	125	

Figure 18: Number of PRS issues recorded by PRS short code, premium rate service provider and Mobile Service Provider Q2 2022

¹¹ 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 Provider⁶ listed in Figure 18 and the total industry average, comparing Q1 2022¹ to Q2 2022. The 'industry average' is based on all PRS issues recorded for all Mobile Service Providers within each quarter.

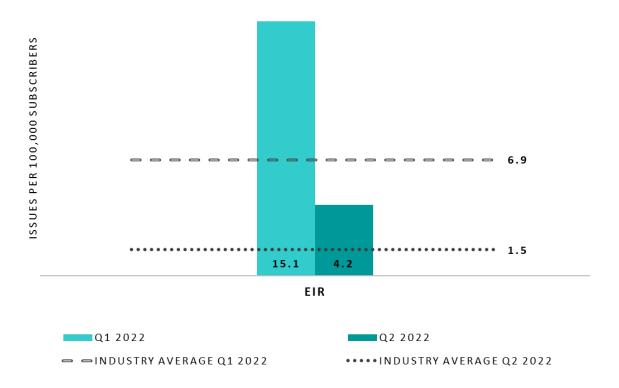


Figure 19: PRS issues by ECS Provider per 100,000 subscribers Q1 2022 vs Q2 2022

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 Q1 2022 to Q2 2022. The total number of issues recorded for Fixed Service Providers in Q2 2022 was 1,753, a 21% decrease compared to Q1 2022, where 2,210 issues were recorded.

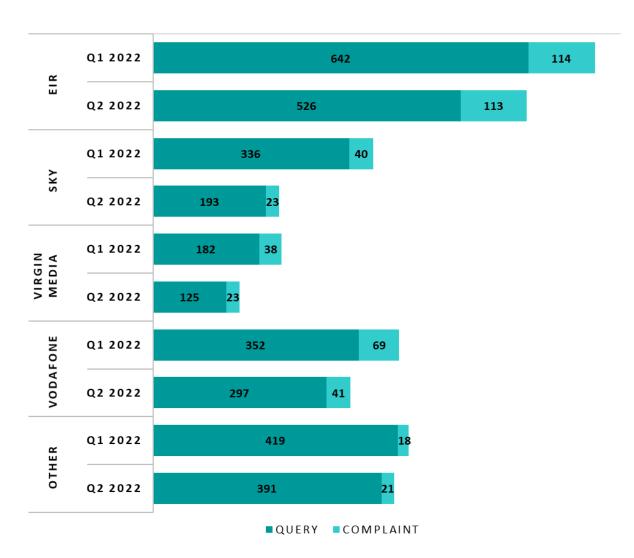


Figure 20: Number of ECS issues queries and complaints by Fixed Service Provider Q1 2022 vs Q2 2022

¹² '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 Q1 2022 to Q2 2022. The 'industry average' is based on all issues recorded within each quarter for all Fixed Service Providers.

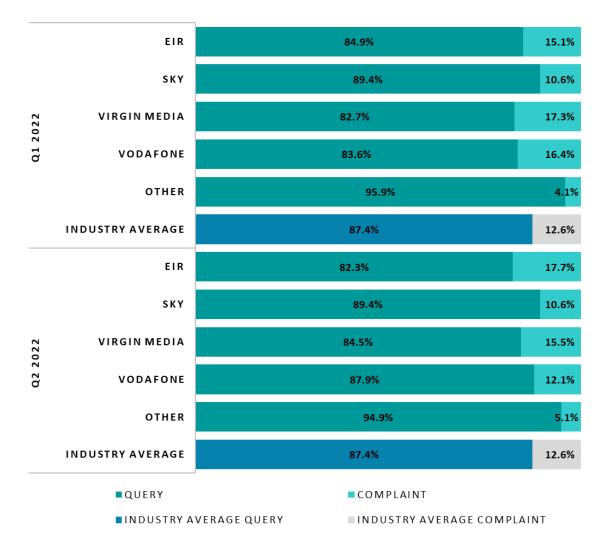
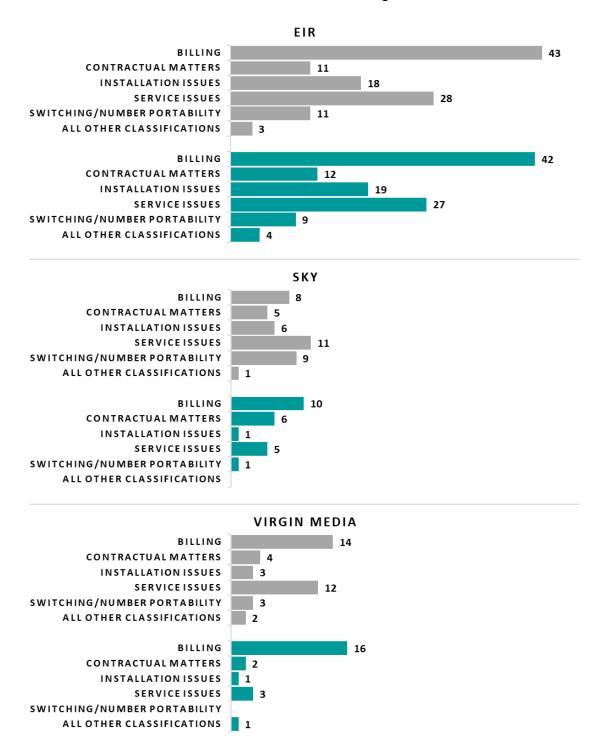


Figure 21: Split of ECS queries and complaints by Fixed Service Provider Q1 2022 vs Q2 2022

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 Q1 2022 with Q2 2022. For details of the highest number of issues recorded for each Fixed Service Provider, see Figure 23.



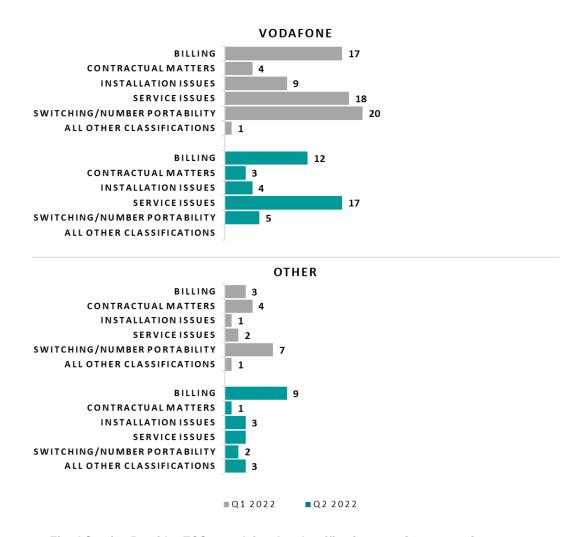


Figure 22: Fixed Service Provider ECS complaints by classification type Q1 2022 vs Q2 2022

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 Q1 2022 to Q2 2022.

	Number of Issues Q1 2022	Number of Issues Q2 2022
Eir		
Billed after cancellation	88	82
Loss of service	96	72
Delay in installation	55	57
Billed more than agreed amount	83	48
Service availability	44	37
Refund not received	55	32
Contract termination issues - cancellation procedures	40	25
Service issues - intermittent service	20	21
Double billed		21
Switching/number portability - number loss	22	20
Sky		
Billed after cancellation	29	33
Loss of service	35	25
Contract termination issues - cancellation procedures	76	24
Double billed		14
Contract termination issues - cancellation not accepted	11	12
Billed more than agreed amount	34	11
Accessing complaints process - complaints information not on website	14	10
Switching/number portability - UAN/CRN issue	24	9
Delay in installation	25	8
Service issues - intermittent service	13	8

Virgin Media		
Billed more than agreed amount	25	20
Billed after cancellation	15	18
Service availability	7	11
Contract termination issues - cancellation procedures	16	10
Pricing transparency		9
Service issues - intermittent service	12	7
Loss of service	20	6
Equipment issues - other equipment		6
Refund not received	18	5
Accessing complaints process - issue lodging formal complaint		4
Vodafone		
Vouaione		
Loss of service	80	69
Billed after cancellation	50	45
Billed more than agreed amount	30	25
Service issues - intermittent service	29	19
Double billed		19
Service availability	17	17
Delay in installation	23	15
Switching/number portability - number loss	14	14
Switching/number portability - delay switching	25	13
Refund not received	13	12

Figure 23: Highest number of issues recorded by Fixed Service Provider Q1 2022 vs Q2 2022

5.4 Fixed Service Provider ECS Complaints Closed in Q2 2022

Figure 24 below shows ECS complaints closed in Q2 2022, for each Fixed Service Provider listed in Figure 20, broken down by number of working days. Complaints closed within Q2 2022 may be re-opened complaints, and may have been first escalated to a Service Provider in previous quarters.

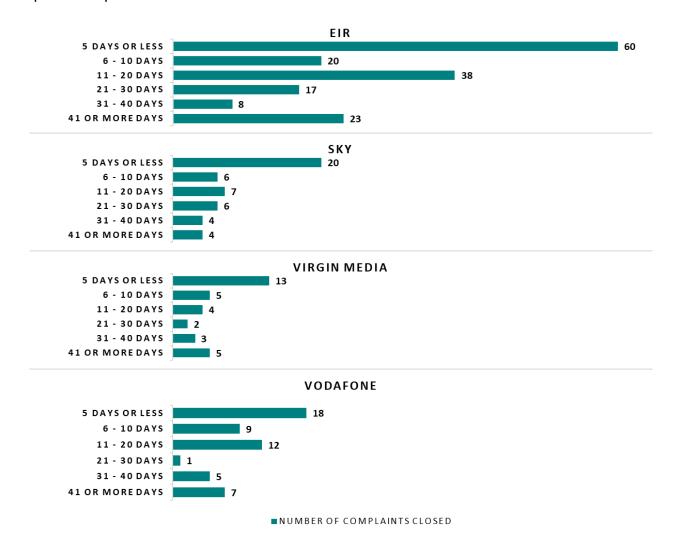


Figure 24: Fixed Service Provider ECS complaints closed in Q2 2022 by number of working days open

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 Q1 2022¹⁰ to Q2 2022. Complaints closed within Q2 2022 may be re-opened complaints, and may have been first escalated to a Service Provider prior to 1 April 2022. The 'industry median' is a 'snapshot' based on all complaints closed within each quarter for all Fixed Service Providers.

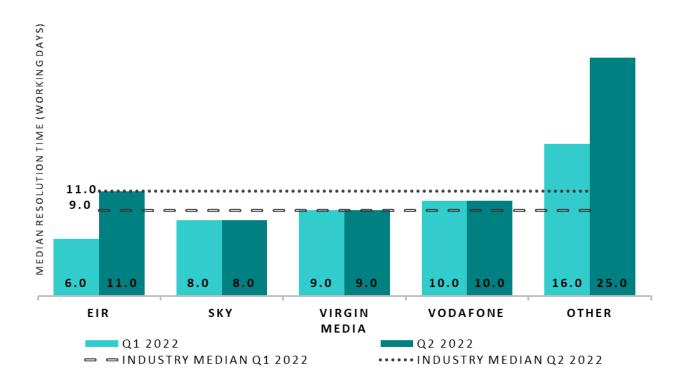


Figure 25: Median complaint resolution time by Fixed Service Provider Q1 2022 vs Q2 2022

Figure 26 provides a further breakdown of the Q2 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.

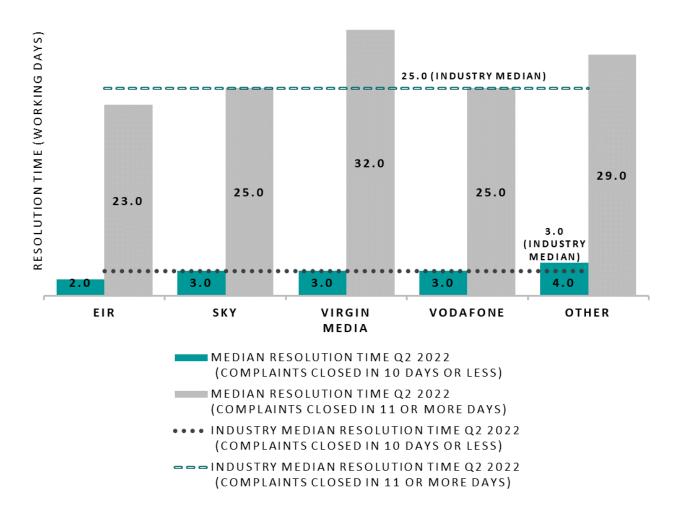


Figure 26: Median complaint resolution time by Fixed Service Provider Q2 2022, complaints closed in 10 days or less versus complaints closed in 11 days or more

Figure 27 below provides the Q2 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.

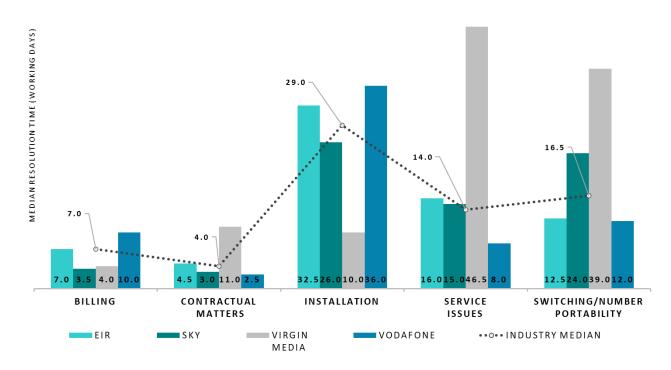


Figure 27: Median complaint resolution time by classification type and Fixed Service Provider Q2 2022

5.5 Fixed Service Provider ECS Complaints Open at 30 June 2022

Figure 28 shows the number of ECS complaints open at 30 June 2022, for each Fixed Service Provider listed in Figure 20, broken down by number of working days elapsed since they were first escalated to the Service Provider.

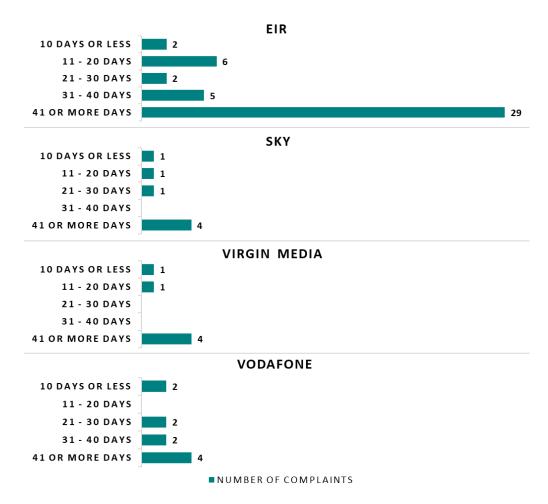


Figure 28: Fixed Service Provider ECS complaints open at 30 June 2022 by number of working days since first escalation

5.6 Fixed Service Provider ECS Complaints per 100,000 Subscribers

Figure 29 below shows the average complaint rate per 100,000 fixed voice subscribers for each Fixed Service Provider listed in Figure 20 and the total industry average, comparing Q1 2022 to Q2 2022. The 'industry average' is a 'snapshot' based on complaints received for all Fixed Service Providers.

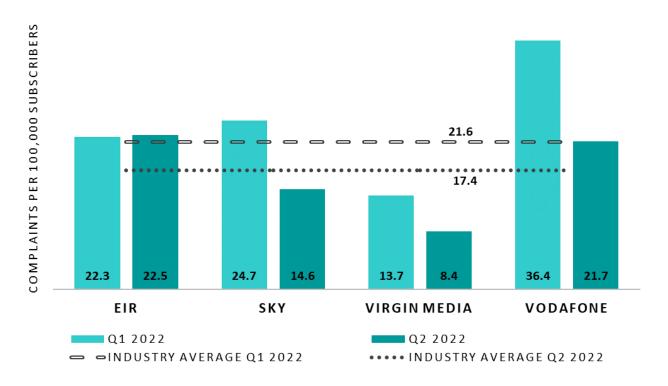
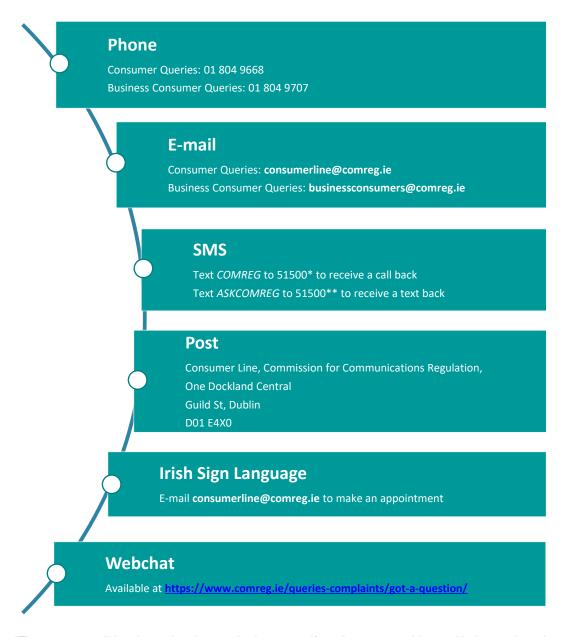


Figure 29: ECS complaints per 100,000 subscribers by Fixed Service Provider Q1 2022 vs Q2 2022

Annex 1: ComReg Consumer Line 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 30 below shows the number of mobile coverage issues versus all other service issues (as reported by consumers) for each Mobile Service Provider^{6,7,8,9} listed in Figure 8, comparing Q1 2022 to Q2 2022.

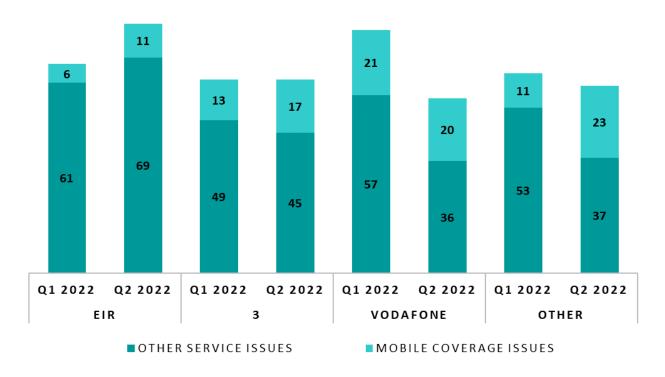
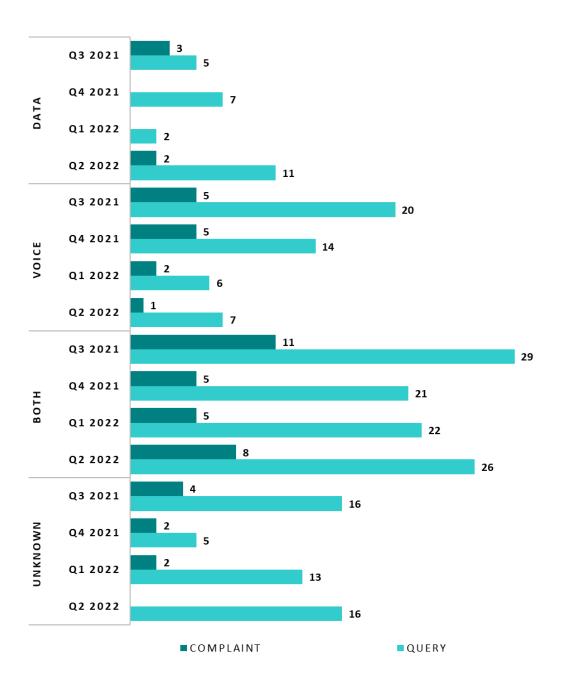


Figure 30: Number of ECS service issues by Mobile Service Provider Q1 2022 vs Q2 2022



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

Figure 31: Mobile Coverage Issues by Type Q3 2021 - Q2 2022

Figure 32 shows the average number of mobile coverage issues recorded per 100,000 subscribers for each Mobile Service Provider^{6,7,8} listed in Figure 8. The 'industry average' is based on mobile coverage issues recorded for all Mobile Service Providers within each quarter.

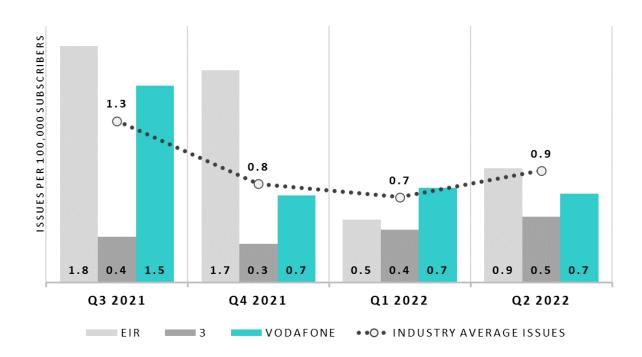


Figure 32: Mobile Coverage issues (per 100,000 Subscribers) Q3 2021 - Q2 2022

Annex 3: Classification Type Index

This Classification Type Index reflects the classification and sub-classification types¹³ relevant to highest volume issues recorded in Q2 2022¹⁴.

Billing includes:

Billed after cancellation

Billed for service not received

Billed more than agreed amount

Double billed

Refund not received

Contractual Matters includes:

Contract termination issues - cancellation not accepted

Contract termination issues - cancellation procedures

Contractual matters - pricing transparency

Misleading sales

Terms & conditions - cancellation penalties

Customer Service includes:

Accessing complaints process - complaints information not on website

Accessing complaints process - issue lodging formal complaint

Installation Issues includes:

Delay in installation

Roaming includes:

Roaming issue - EU voice and data

Service Issues includes:

Equipment issues - handset

Equipment issues - other equipment

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

¹³ Sub-classification types may vary each quarter based on the nature of issues reported by consumers.

¹⁴ For detail on classification and sub-classification types relevant to highest volume issues recorded in Q1 2022, see ComReg Consumer Line Statistics Report Q1 2022.

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