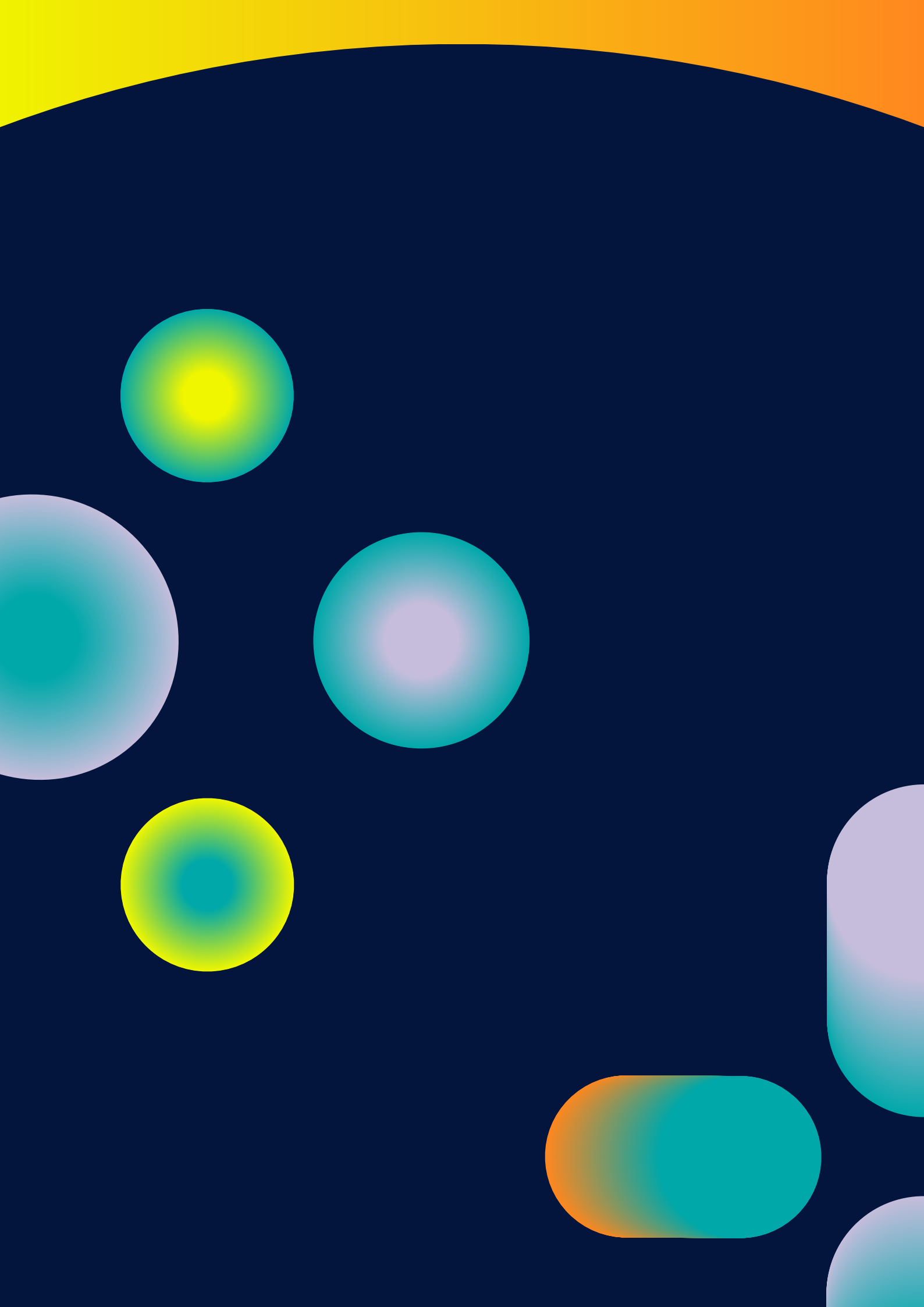




An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

# Strategy Statement 2025–2027





# Strategy Statement

## 2025–2027

ComReg document 25/37



# Table of Contents

<b>1.</b>	<b>Introduction</b>	<b>1</b>
<b>2.</b>	<b>Who we are, and what we do</b>	<b>4</b>
2.1	Our Mandate	4
2.2	Our Mission	5
2.3	Our Vision	6
2.4	Our Values	7
2.5	Our Areas of Responsibility	7
<b>3.</b>	<b>Our stakeholders</b>	<b>13</b>
<b>4.</b>	<b>A Changing Environment</b>	<b>14</b>
4.1	Industry – and regulation – in transition	14
4.2	Managing change effectively	17
<b>5.</b>	<b>Our Strategic Priorities and Goals</b>	<b>19</b>
5.1	Context	19
5.2	Strategic Priorities	20
<b>6.</b>	<b>Strategy delivery and reporting</b>	<b>24</b>

# 1. Introduction

ComReg is entering a period of significant change, when we will embrace new responsibilities and confront evolving market realities. Our existing mandate in respect of electronic communications, postal services, radio spectrum, and premium rate services remains a core part of our work. However, in addition, ComReg has recently been assigned – and expects over the lifetime of this Strategy Statement to be assigned – new responsibilities in such areas as the European Accessibility Act,<sup>1</sup> the Data Act,<sup>2</sup> the second Network and Information Systems ('NIS2') Directive,<sup>3</sup> the Critical Entities Resilience ('CER') Directive,<sup>4</sup> and the Artificial Intelligence ('AI') Act.<sup>5</sup> As a result of these new responsibilities, ComReg will be active in new sectors with new stakeholders, both in Ireland and across Europe. We are an Irish and European regulator, and we will continue to hold ourselves to the highest standards as we navigate a dynamic environment in the coming years.

- 
- 1 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 'European Accessibility Act'), Directive (EU) 2019/882, as transposed into Irish legislation by means of S.I. No. 636/2023 – the European Union (Accessibility Requirements of Products and Services) Regulations 2023.
  - 2 Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act) (the 'Data Act').
  - 3 Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148 (the 'NIS2 Directive').
  - 4 Directive (EU) 2022/2557 of the European Parliament and of the Council of 14 December 2022 on the resilience of critical entities and repealing Council Directive 2008/114/EC (the 'Critical Entities Resilience', or 'CER' Directive), which has been transposed into Irish law by means of S.I. No. 559/2024 – the European Union (Resilience of Critical Entities) Regulations 2024.
  - 5 Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (the 'AI Act').

In preparing this strategy, we have considered how our mandate is likely to change, and how this should be reflected in our strategy process. We have developed our strategy statement based on a number of high-level principles that are intended to span the breadth of both our existing functions, and the new functions ComReg will soon be assigned. This allows us to communicate the principles that will guide our work over the coming years as our current dynamic environment continues to evolve. Our mandate, mission, and vision apply across the entirety of our range of responsibilities. Accordingly, we have decided to issue a single all-of-ComReg strategy statement, rather than separate strategy statements in respect of our electronic communications and premium rate services, postal, and radio spectrum functions, as has been our practice heretofore.

Our strategy is most effective when it is aligned with related strategies, plans and policies.

Accordingly, our Strategy Statement has regard, *inter alia*, to:

- The **Digital Connectivity Strategy for Ireland**,<sup>6</sup> which aims for all Irish households and businesses to be covered by a Gigabit network by no later than 2028, and all populated areas to be covered by 5G by no later than 2030;
- The European Commission ('EC') **Digital Decade**<sup>7</sup> connectivity targets, as localised in the **Digital Decade Policy Programme – Ireland's National Strategic Roadmap** – all Irish households and businesses covered by a gigabit network by no later than 2028, and all populated areas covered by 5G by no later than 2030;
- The **Mobile Phone and Broadband Taskforce Work Programme** – under the 2024–2025 Work Programme ComReg undertook actions to assist in improving consumer information and experience;<sup>8</sup>
- The European Parliament and Council **Radio Spectrum Policy Program**<sup>9</sup> ('RSPP') which established a multiannual radio spectrum policy programme, and the related Radio Spectrum Policy Group ('RSPG') opinion on the focus of the next RSPP;<sup>10</sup>
- The **Programme for Government 2025 – Securing Ireland's Future**,<sup>11</sup> which commits to tackling mobile phone and broadband blackspots, publishing and implementing a National Digital Strategy, and delivering a National Cybersecurity Strategy; and

---

6 [gov.ie – Digital Connectivity Strategy](https://www.gov.ie/en/publications-and-resources/documents/2022-01-digital-connectivity-strategy/)

7 Article 4(2)(a) of Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030.

8 [www.gov.ie/pdf/?file=https://assets.gov.ie/301564/3aef4dc4-af9f-495b-b10e-5223a8867fdb.pdf#page=null](https://www.gov.ie/pdf/?file=https://assets.gov.ie/301564/3aef4dc4-af9f-495b-b10e-5223a8867fdb.pdf#page=null)

9 [https://eur-lex.europa.eu/eli/dec/2012/243\(2\)/oj](https://eur-lex.europa.eu/eli/dec/2012/243(2)/oj)

10 [https://radio-spectrum-policy-group.ec.europa.eu/system/files/2023-01/RSPG21-033final-RSPG\\_Opinion\\_on\\_RSPP.pdf](https://radio-spectrum-policy-group.ec.europa.eu/system/files/2023-01/RSPG21-033final-RSPG_Opinion_on_RSPP.pdf)

11 [gov.ie – Programme for Government 2025 – Securing Ireland's Future](https://www.gov.ie/en/publications-and-resources/documents/2023-01-programme-for-government-2025-securing-irelands-future/)

- **Le Chéile 25<sup>12</sup>** – the Department of the Environment, Climate and Communications ('DECC') Strategy Statement, in particular, Strategic Goal 4 – Deliver world class connectivity and communications, and Strategic Goal 5 – Deliver enhanced cyber security defence and resilience across Government and Society.

We will proactively engage with, and play our part in supporting, these objectives. Additionally, our new and emerging responsibilities will have regard to relevant strategic guidance and documentation which has not yet been published, as they come on stream. For example, as the Competent Authority in the State on resilience in respect of critical entities in the digital infrastructure sector under the CER Directive, ComReg will have regard to the National Strategy for the Resilience of Critical Entities which the Department of Defence Office of Emergency Planning will deliver in Q1 2026.

Over the coming years, we will take on functions relating to the resilience and security of key pieces of the digital ecosystem. Communications and cloud are integral technologies to our daily lives. Access, resilience and cybersecurity are critical to ensuring the trust and confidence of consumers and businesses. These sectors also form the backbone of the wider digital economy in which Ireland is a key player.

We thank our stakeholders, who have engaged positively with us in this process. We look forward to further engagement with both existing and new stakeholders as we navigate this period of change.

---

<sup>12</sup> [gov.ie – Statement of Strategy 2024–2025](https://www.gov.ie/statement/strategy/2024-2025)

## 2. Who we are, and what we do

- 2.1 The Commission for Communications Regulation ('ComReg') is responsible for regulating communications services in Ireland including, but not limited to, postal services, premium rate services, electronic communications networks and services, emergency call answering and public warning communications, and radio spectrum. We have been assigned new roles in respect of accessibility requirements for end users and physical resilience. Additionally, we expect to be assigned further responsibilities in new sectors over the lifetime of this Strategy Statement. These sectors are likely to include, *inter alia*, cybersecurity and access to, and use of, data.
- 2.2 ComReg operates within the statutory framework provided by Irish and EU law. Our work to serve the interests of users impacts every Irish home and business.

### 2.1 Our Mandate

- 2.3 **Our mandate sets out the authority we have to carry out our functions. We deliver on our mission by applying the tools and powers provided to us by our mandate.**
- 2.4 ComReg has a wide-ranging and evolving mandate which derives from extensive EU and Irish primary and secondary legislation. Our mandate has, to date, been centred on our statutory obligations which include, but are not limited to, premium rate services, electronic communication services and networks, postal services, emergency call answering and public warning communications, and managing Ireland's radio spectrum resource. A recent expansion of our mandate has come by way of the transposition of the CER Directive, which designated ComReg as the Competent Authority in the State on resilience in respect of critical entities in the digital infrastructure sector. Our mandate will likely continue to expand into new areas over the lifetime of the 2025–2027 Strategy Statement and beyond.
- 2.5 Government has, as of 2025, assigned – or signalled its intention to assign – by means of legislation, specific roles to ComReg in the areas of accessibility, cybersecurity, physical resilience, AI, cloud and data. ComReg will likely share regulatory, supervisory, or oversight responsibilities with other state agencies or regulatory authorities in certain instances.



## 2.2 Our Mission

- 2.6 **Our mission describes what we do and why we do it. It reflects our role and sets out the contribution we make towards achieving our vision.**
- 2.7 ComReg's mission is to implement effective regulation that supports the delivery of widespread, modern and resilient communications networks, products, and services which, ultimately, benefit users. We regulate the electronic communications and postal sectors and radio spectrum. We also have – or will have in the near future – specific responsibilities in the fields of physical resilience and cybersecurity under the NIS2 and CER Directives, as well as in the fields of data, cloud, and accessibility for end users.
- 2.8 To deliver effective regulation, we will
- a) Facilitate a competitive communications sector in Ireland that works well for users;
  - b) Empower and protect users, including end users with disabilities;
  - c) Oversee operator obligations to build resilience and security into their networks and services;
  - d) Manage Ireland's radio spectrum and numbering resources; and
  - e) Prepare to implement our new regulatory responsibilities.
- 2.9 We regularly work with other bodies and agencies. Where we share regulatory responsibilities with other bodies, we will work to minimise duplication of effort by cooperating to coordinate regulatory oversight of stakeholders.

## 2.3 Our Vision

- 2.10 **Our vision is an aspirational description of what we want to achieve or accomplish in the mid-term or long-term. Looking forward, it is the outcome we aim to help to bring about.**
- 2.11 ComReg's vision is for users to have access to ubiquitous, affordable, and high-quality digital and communications services which support their social and economic needs. To deliver our vision, we will be an innovative, expert regulator at the forefront of best practices across all our functions. To achieve our vision, we will:
- a) Deliver a regulatory environment that facilitates the development of effective competition and innovation in the Irish communications market to the benefit of users;
  - b) Promote and protect the interests of users of electronic communications, premium rate services, radio spectrum, postal services, and designated digital services;
  - c) Take compliance action to ensure the proper functioning of markets and uphold consumer rights;
  - d) Provide for proportionate NIS2 regulatory supervision and enforcement functions for entities in scope upon transposition of the NIS2 Directive;
  - e) Contribute to resolving the imbalance of power between providers and customers in the EU cloud market; and
  - f) Manage Ireland's spectrum and numbering resources to ensure efficient usage, prevent misuse, and restore trust.

## 2.4 Our Values

- 2.12 ComReg’s values are the guiding principles that shape our mission and vision, and they reflect our commitment to high ethical standards. They are core to our decision making and how we conduct ourselves.

Value	Description
<b>Integrity</b>	We act with honesty and respect, and we adhere to the highest ethical and professional standards.
<b>Impartiality</b>	Our actions are evidence-based, objective, independent, non-discriminatory, and accessible.
<b>Effectiveness</b>	We successfully deliver our objectives in a dynamic environment.
<b>Excellence</b>	We are always striving to achieve the highest standards.
<b>Transparency</b>	We ensure trust and confidence by being clear and open in the work we do.

## 2.5 Our Areas of Responsibility

- 2.13 Section 31(2) of the Communications Regulation Act 2002, as amended (the ‘Act’) requires ComReg to draw up a strategy statement every two years and, in doing so, to distinguish between its functions in relation to:
- a) Electronic communications,
  - b) Premium rate services,
  - c) Management of radio frequency spectrum, and
  - d) Postal services.
- 2.14 Additionally, ComReg is gaining, and expects to gain over the lifetime of this Strategy Statement, additional functions beyond those currently enumerated in the Act.

## 2.5.1 Electronic Communications

- 2.15 ComReg's role in electronic communications includes consumer protection and the economic regulation of certain markets.
- 2.16 ComReg protects and empowers consumers. We protect consumers through monitoring operator behaviour in retail markets, ensuring effective redress and, where appropriate, taking compliance action where consumer detriment has occurred. We empower consumers through the provision of information and tools, and by advocating for consumers as changes occur in the delivery of communications services. Our role in consumer protection also encompasses aspects of the European Accessibility Act, which ensures that all consumers, particularly those with disabilities, are provided with information, products and services by their operators which are suited to their access needs.
- 2.17 Our economic regulation function is underpinned by *ex ante* powers set out in the European Electronic Communications Code (the '**EECC**').<sup>13</sup> Where ComReg intervenes in a market, it does so with the intent of addressing the anti-competitive exercise of Significant Market Power ('**SMP**'), facilitating conditions which promote market entry and expansion, and fostering competition where it is not effective. The analysis we carry out using these powers takes a forward-looking view of markets. This contrasts with our complementary *ex post* competition law powers, which empower us to intervene to bring to an end anti-competitive behaviours which have occurred in a market including abuse by a dominant firm of its market power.
- 2.18 Where there is evidence of sufficiently effective competition, ComReg will deregulate and, over the lifetime of the 2023–2025 Electronic Communications Strategy Statement, ComReg has deregulated a number of wholesale markets in accordance with the principles underpinning the EECC.
- 2.19 ComReg will continue to monitor both regulated and deregulated markets, having regard to both our *ex ante* SMP powers and our *ex post* competition law powers. We will engage proactively with the Body of European Regulators for Electronic Communications ('**BEREC**') and the European Commission ('**EC**') on the next iteration of the EC's *Recommendation on relevant markets susceptible to ex ante regulation* as well as the review of the EECC. In this context, we are of the view that, where SMP exists, *ex post* powers alone will be insufficient to ensure effective competition. It therefore follows that, in principle, we will continue to need the option to intervene, where appropriate, on an *ex ante* basis.

---

<sup>13</sup> Directive (EU) 2018/1972 of 11 December 2018 (the '**EECC**') as transposed into Irish legislation by means of the Communications Regulation and Digital Hub Development Agency (Amendment) Act 2023 and European Union (Electronic Communications Code) Regulations 2022, S.I. 444/2022.

## 2.5.2 Premium Rate Services

- 2.20 ComReg monitors, investigates, and enforces compliance by premium rate service ('**PRS**') providers with the consumer protection provisions of the Communications Regulation (Premium Rate Services and Electronic Communications Infrastructure) Act 2010, as amended.
- 2.21 PRS consists of certain services which consumers can purchase using their landline, mobile phone, the internet or interactive digital TV. ComReg regulates the content and promotion of PRS which costs more than 25c per call or text. Examples of PRS include, but are not limited to, chatlines, charity or not-for-profit services, TV quizzes, game shows, competitions or voting, and horoscopes or psychic services.
- 2.22 PRS providers must be licensed by ComReg, and it is an offence to provide a PRS without holding the necessary licence. ComReg maintains an electronic register of PRS providers, which allows end users to check the name and number of a PRS they intend to use or have been billed for using.<sup>14</sup> ComReg carries out investigations relating to the provision, content and promotion of PRS to fulfil its obligation to protect the interests of end users of PRS.
- 2.23 Licensed PRS providers must abide by the conditions attached to their licences, including the requirement to comply with ComReg's PRS Code of Practice.<sup>15</sup> ComReg monitors developments in the provision of PRS to ensure that end users are not incorrectly subscribed and that PRS providers adhere to requirements set out in the Code of Practice.

---

14 [www.comreg.ie/servicechecker](http://www.comreg.ie/servicechecker)

15 Code of Practice – Premium Rate Services. Decision D03/14 <http://www.comreg.ie/csv/downloads/ComReg1445.pdf>

## 2.5.3 Management of Radio Frequency Spectrum

- 2.24 Radio spectrum is a medium by which information may be transmitted wirelessly over distances ranging from a few metres to thousands of kilometres. It is a valuable national resource underpinning important economic, social and communications activities. These include widely used services, such as mobile and fixed wireless communications and broadband, radio and TV broadcasting, and the safe operation of air and maritime transport. Radio spectrum is also fundamental to the operation of the emergency services and defence forces and is a vital input to important scientific applications, such as weather forecasting and monitoring the Earth's environment.
- 2.25 Radio spectrum is a finite natural resource with competing uses and users which must be managed effectively and used efficiently. ComReg regularly reviews its strategy and radio spectrum workplan to ensure the effective management of Ireland's radio spectrum resource.
- 2.26 As part of the move to a single all-of-ComReg Strategy Statement, ComReg no longer issues a separate Radio Spectrum Management Strategy Statement. Rather, ComReg details its radio spectrum management work in a multi-annual Operating Plan. Accordingly, in December 2024 ComReg issued its Radio Spectrum Management Operating Plan 2025–2028, which sets out its programme of work for the next two years.<sup>16</sup>

## 2.5.4 Postal Services

- 2.27 ComReg regulates postal services, including the universal postal service in Ireland. Our mandate derives from the Communications Regulation (Postal Services) Act 2011, as amended, which transposes the European Postal Services Directive<sup>17</sup> into Irish law.

### **Postal services regulation**

- 2.28 Postal service providers, including An Post, are entitled to launch any postal service having first notified ComReg, at which point they become an Authorised Postal Service Provider. Our role in respect of such services is limited. We ensure that all postal service providers implement and publish a code of practice covering customer complaints and redress. Relatedly, we perform a consumer dispute resolution role for both senders and receivers of post.

---

<sup>16</sup> [Radio Spectrum Management Operating Plan 2025 – 2028 | Commission for Communications Regulation](#)

<sup>17</sup> Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service (the 'Postal Services Directive').

## Universal postal service regulation

- 2.29 The universal postal service ('UPS') is a safeguard to ensure that all end users in Ireland can send and receive post nationwide. The UPS means at least one collection and one delivery to all, on every working day (Monday to Friday). The most popular universal postal service is letters for delivery within Ireland. ComReg ensures the provision of a UPS to all nationwide on every working day, at an affordable price, and to a sufficient level of quality. Following consultation in 2023, An Post has been designated as the universal postal service provider ('UPSP') until 1 August 2029, unless otherwise amended by ComReg. As the UPSP An Post is subject to additional regulatory requirements.

## Our postal strategy

- 2.30 ComReg's 2024–2026 Postal Strategy Statement was published in December 2023 and remains in effect until the end of 2025. Upon expiry of the 2024–2026 Postal Strategy Statement, ComReg's postal strategy will be guided by this Strategy Statement. The 2024–2026 Postal Strategy Statement identifies three goals and two objectives for each of those goals, which will continue to guide our postal strategy until the end of 2025:

Goal	Objective
<b>1. Ensure a universal postal service</b>	Assess the reasonable needs of postal service users
	Monitor compliance with universal postal service requirements
<b>2. Promote and protect the interests of postal service users</b>	Empower postal service users by ensuring the availability of accurate and appropriate information
	Protect postal service users by ensuring the availability of complaints and redress procedures
<b>3. Promote the development of the postal sector</b>	Promote the development of the postal sector by providing research, data, and information
	Facilitate the development of the postal sector by delivering our legal mandate

## 2.5.5 New and likely new areas of responsibility

### **Consumer accessibility to services**

- 2.31 ComReg has acquired new consumer accessibility responsibilities. Under the European Union (Accessibility Requirements of Products and Services) Regulations 2023, which transpose into Irish law the European Accessibility Act, ComReg has been designated as a compliance authority in respect of electronic communications services and emergency communications to the 112 emergency number.
- 2.32 This means that, from 28 June 2025, ComReg is responsible for monitoring the compliance of these services with the obligation to be accessible to, and usable by, consumers and, in particular, people with disabilities.

### **Physical network resilience and cybersecurity**

- 2.33 ComReg is in the process of being assigned significant roles under two EU directives. Under the NIS2 Directive ComReg will take on certain responsibilities in the field of cybersecurity, while under the CER Directive (which has been transposed into Irish law by means of the European Union (Resilience of Critical Entities) Regulations 2024) ComReg has been designated as the competent authority for the resilience of critical entities in the digital infrastructure sector including, but not limited to, publicly available electronic communications networks, cloud computing services, and data centres.
- 2.34 Under NIS2, ComReg expects to take on significant responsibilities in cybersecurity on a pan-European basis, given the principle of main establishment. NIS2 considers an entity to have its main establishment in the EU Member State where it predominantly takes decisions related to its cybersecurity risk-management measures. Thus, for any entities where such decisions are taken in Ireland, ComReg will have lead regulatory responsibilities.

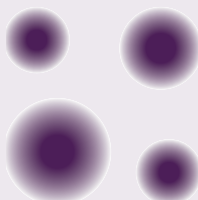
### **Data**

- 2.35 The Data Act is an EU regulation which entered into force in January 2024 and will take effect from September 2025. Under the forthcoming EU Data Regulation Bill, ComReg is likely to be designated as the competent authority in the State for the switching and interoperability of data processing services delivered through cloud services, namely Infrastructure as a Service ('IaaS'), Platform as a Service ('PaaS') and Software as a Service ('SaaS'). ComReg's role in respect of data regulation will be clarified as the relevant legislation develops.



## 3. Our stakeholders

- 3.1 We are guided by our values in our interactions with our stakeholders. In particular, we practice transparency, to ensure trust and confidence by being clear and open in the work we do. In practice this means that, unless we are constrained to respect the confidentiality of the information we hold, we communicate openly and proactively with our stakeholders. We want our stakeholders to engage with us, so that we deliver results which are targeted, effective, and proportionate. We also want our stakeholders to understand the reasoning underpinning our decisions and actions, and what that means for them.



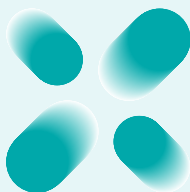
### Society

The public  
NGOs and advocacy groups  
Representative bodies  
End users of relevant services located in Ireland or, in the case of products and services for which ComReg has EU-level supervisory responsibilities, end users located in the EU  
Media organisations



### Industry

- Businesses located in Ireland and serving Irish clients or multinational businesses whose EU headquarters are in Ireland, active in the provision of:
  - Electronic Communications Services
  - Electronic Communications Networks
  - Premium Rate Services
  - Postal Services
  - Services reliant on radio spectrum
  - Data
  - Cloud services
  - Data centres
  - Cybersecurity
- Legal, economic, and regulatory professionals



### Government, the EU, and the Public Sector

- The Government of Ireland
- The Houses of the Oireachtas and their Members
- Irish Civil Service and Public Sector Bodies
- The European Commission Directorate-General for Communications Networks, Content and Technology (DG CONNECT)
- The European Commission Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW)
- The Body of European Regulators for Electronic Communications ('BEREC')
- The European Regulators Group for Postal Services ('ERGP')
- International policy and advisory bodies
- EU National Regulatory Authorities ('NRAs')
- EU National Competition Authorities ('NCAs')
- International non-EU NRAs

## 4. A Changing Environment

### 4.1 Industry – and regulation – in transition

- 4.1 Over the past strategy period, ComReg has delivered on its mandate. Alongside our existing functions, we must now turn to delivering on what will be new in our mandate. We will provide regulatory clarity and certainty to entities that have not previously been regulated by ComReg, as well as to our existing stakeholders.
- 4.2 We expect our mandate and, as a result, our organisation to expand significantly over the two-year term of this strategy statement, driven by the legislative developments set out above. New responsibilities will require ComReg to adapt how it regulates and integrate new skillsets into its existing operations. We will do so in the first instance by leveraging our existing capabilities to the greatest extent possible. We will also recruit people with the skills we need to deliver on our new functions.
- 4.3 Under ComReg's watch, strong investment in next generation networks has continued. As of Q4 2024, 85% of Irish premises are passed by at least one fibre to the premises ('FTTP') or cable network capable of delivering download speeds greater than 100Mbps. 57% of those premises are connected to these networks.<sup>18</sup> The ongoing rollout of FTTP by Eircom, Virgin Media and SIRO on a commercial basis, and by NBI on a state-aided basis in the Intervention Area, leaves Ireland well-placed to reach its EU Digital Decade coverage targets. Similarly, 5G rollout continues, with the European 5G Observatory noting population coverage of 85.3% in Ireland as of 2023, the most recent period for which data are publicly available.<sup>19</sup>
- 4.4 Economic regulation continues to have a critical role to play in encouraging market entry and expansion, facilitating competition, and protecting the interests of end users, in circumstances where markets do not otherwise deliver these outcomes. ComReg has focussed on the prudent application of regulation where warranted, and the removal of regulation where, on the basis of the evidence available, it is no longer justified. ComReg will, however, continue to actively monitor those wholesale markets which are no longer subject to economic regulation and, where necessary, stands ready to reintervene on an *ex ante* (using regulation) or – in the case of telecommunication markets – an *ex post* basis (using competition law) in markets which it has previously deregulated. In this respect, a key challenge for ComReg will be how to facilitate the proper working of markets which have been deregulated, but remain highly concentrated.

---

<sup>18</sup> Irish Communications Market Summary: Quarterly Key Data Report, Q4 2024. Reference: ComReg 25/13.

<sup>19</sup> [5G Scoreboard – 5G Observatory](#)

- 4.5 As the response to the disruption to telecommunications networks and services occasioned by Storm Éowyn in January 2025 indicates, network resilience is a prerequisite for Irish businesses and end users. As resourcing becomes available over the lifetime of this Strategy Statement and beyond, ComReg will aim to exercise its powers under the CER Directive so that operators deliver reliable and resilient networks that consumers can trust.
- 4.6 Over the lifetime of this Strategy Statement, we expect to take on additional regulatory responsibilities, and, accordingly, new stakeholders. We will engage with our stakeholders consistent with our mandate, mission, vision, and values. Our outputs benefit from high-quality stakeholder inputs. Therefore, we will communicate with our stakeholders in a focussed, clear, and timely manner.
- 4.7 The term of the 2025–2027 Strategy Statement coincides with a period of significant legislative, sectoral, political and economic change. In Europe, policy makers have identified challenges to completing the Single Market and ensuring Europe’s competitiveness on a global stage. Against this backdrop, European growth and competitiveness remains a key challenge, prompting the recent Letta<sup>20</sup> and Draghi<sup>21</sup> Reports, and the EC Competitiveness Compass<sup>22</sup> initiative. ComReg has carefully assessed the analysis and proposals set out in these reports and will continue to provide comments on any forthcoming legislative proposals through the Department of Culture, Communications and Sport, and BEREC. Other geopolitical challenges include assuring the security of Europe’s physical and digital communications assets in the face of malfeasance by state and non-state actors.
- 4.8 Ireland’s – indeed, Europe’s – future competitiveness also depends on our capacity to respond to the pace and scale of technological change. As the rollout of next generation fixed and mobile networks matures, regulators must decide, consistent with their statutory mandate, where and how to intervene in communications markets to best deliver for end users. Additionally, increased and more data-intensive usage trends and emerging technologies, such as, for example, Generative AI, may lead to services and networks becoming constrained. If so, regulators must agree how those constraints should best be managed.

---

<sup>20</sup> ‘Much more than a Market – Speed, Security, Solidarity. Empowering the Single Market to deliver a sustainable future and prosperity for all EU Citizens’ [Enrico Letta - Much more than a market \(April 2024\)](#)

<sup>21</sup> ‘The future of European competitiveness’ [The Draghi report on EU competitiveness](#)

<sup>22</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions – A Competitiveness Compass for the EU [10017eb1-4722-4333-add2-e0ed18105a34\\_en](#)

- 4.9 The importance of managing the digital transition is coupled with the need for a green transition, focused on minimising the negative impact of human activity on the planet. This approach is reflected in the EU's 'twin transition', and substantial change will be required across all sectors to meet Europe's – and Ireland's – climate and emissions targets. The communications and digital sectors have their part to play, both by minimising their own environmental footprints, and by enabling other sectors to minimise negative environmental impacts through digital connectivity use cases.
- 4.10 For the communications sector, the rollout of fibre, which is replacing relatively less energy efficient legacy copper networks, is one example of a development which will help ensure the sector's environmental sustainability. ComReg is taking an oversight role in ensuring that, in meeting its obligations under the EECC, Eircom applies a copper switch-off process which occurs in an orderly and timely fashion, while ensuring that end users who currently rely on services delivered over copper infrastructure continue to be protected during the transition to full fibre.
- 4.11 ComReg has set out a framework for migration from legacy copper infrastructure.<sup>23</sup> The first step in that framework is for Eircom to submit a Switch Off Proposal to ComReg for approval. In September 2024, ComReg published guidelines for retail operators on customer migration during the copper switch-off process.<sup>24</sup>
- 4.12 ComReg is a relevant body under the Climate Action and Low Carbon Development (Amendment) Act 2021 and will continue to support DECC in the process of revising the Communications Sectoral Adaptation Plan ('SAP') due in 2025 under the revised National Adaptation Framework ('NAF'). Certain adaptation measures undertaken in the face of extreme weather conditions caused by climate change, i.e. energy efficiency measures for resilience, can also contribute to the mitigation of the sector's negative environmental impact.

---

23 Framework for the Migration from Legacy Infrastructure to Modern Infrastructure: Response to Consultation and Decision. Decision: D09/23. [ComReg23102.pdf](#).

24 [Guidance for Retail Service Providers on Customer Migration from Copper-Based Electronic Communication Services – Management of Migration and Future Copper Switch-Off | Commission for Communications Regulation](#)

- 4.13 The scale and pace of change that will confront ComReg and other regulators across the EU is substantial. Managing this change will require substantive engagement with stakeholders from many jurisdictions and an active voice in the process of shaping the regulation of the future. Nationally, ComReg collaborates with other regulators both bilaterally and through fora such as the Digital Regulators Group (consisting of ComReg, the CCPC, the Data Protection Commission, and Coimisiún na Meán) and the Economic Regulators Network (consisting of ComReg, the CCPC, Coimisiún na Meán, the Commission for Regulation of Utilities, the Central Bank, the Irish Aviation Authority, and the National Transport Authority). ComReg is also engaged internationally, and contributes to policy development and technical understanding through bodies such as the OECD, BEREC (which ComReg chairs in 2025), the Independent Regulators Group ('**IRG**'), the International Telecommunications Union ('**ITU**'), and the European Conference of Postal and Telecommunications Administrations ('**CEPT**').
- 4.14 It is important to recall that our Strategy Statement reflects ComReg in a time of transition. We have not yet been assigned all our (likely) new responsibilities. In some instances – for example, NIS2 – we have guidance on our role pending transposition, but we will be focussed on resourcing and establishing our new function over the lifetime of this Strategy Statement. In other instances, such as data and the cloud, we expect to have new responsibilities, but the parameters thereof have not yet been defined. We are clear that ComReg will be a very different organisation by the end of this strategy term. For some functions we may be fully established, while other functions may still be evolving.

## 4.2 Managing change effectively

- 4.15 ComReg is taking on significant changes in its operating environment stemming both from legislative developments and industry trends over the lifetime of this Strategy Statement. Our focus is to articulate a clear vision for our priorities amidst this change. We will manage change effectively by continuing to deliver on our mandate while responding to new imperatives.

### **Delivering across our mandate, now and into the future**

- 4.16 We have a substantial existing mandate to deliver. When we take on new responsibilities which require new domains of expertise, we will endeavour to ensure we have the right resources. We will leverage our existing expertise and provide our staff with opportunities to develop the skills we require to deliver on our expanding mandate. We will also hire people with the skillsets we need to deliver on that expanding mandate. Our people are united by a common sense of purpose and a shared commitment to our values. ComReg is committed to working with relevant Government departments to ensure it is appropriately resourced for its designated Competent Authority roles for the CER Directive, the NIS2 Directive, and the Data Act.

### **Stability in the context of change**

- 4.17 Delivering on the new aspects of our mandate must not be at the expense of our existing functions. While significant organisational change is required to deliver our expanded remit, we will continue to deliver on our current roles and expertise without compromising the quality of our decision making. We will ensure continued resourcing and support for the teams that maintain our existing functions while embarking on a pathway of significant expansion. We will closely align our annual action plan with our Strategy Statement, so that stakeholders can have confidence that our operational planning reflects our strategic thinking.

### **Proactive engagement**

- 4.18 We hold ourselves to high standards. This means reassessing our priorities, processes and procedures to ensure that we are delivering for our stakeholders in accordance with our mandate. We will engage proactively with all of our stakeholders, paying particular attention to taking the time to develop strong working relationships with our new stakeholders. Where we share statutory or regulatory powers with other bodies, we will collaborate to ensure that new and existing regulation is applied effectively, with a minimum of overlap.

### **Changing legislation**

- 4.19 Over the lifetime of the 2025–2027 Strategy Statement, further legislative change is likely. At EU level, Commission President von der Leyen has announced the first major initiative of the new Commission – a Competitiveness Compass which is built on the three pillars of the Draghi Report. Additionally, Commissioner Virkkunen has been tasked with delivering a Digital Networks Act building on the EC’s February 2024 White Paper, *How to master Europe’s digital infrastructure needs*, to help boost secure high-speed fixed and wireless broadband, and to incentivise and encourage investments in digital infrastructure. Moreover, the EC has committed to reviewing the operation of the EECC by the end of 2025. Based on our deep understanding of markets, ComReg will play an active role in, upon request, advising the Government, and, through BEREC, the EC.

# 5. Our Strategic Priorities and Goals

## 5.1 Context

- 5.1 We set out below five strategic priorities that will underpin ComReg's activities over the term of this strategy statement, accompanied by a series of goals. These strategic priorities reflect the significant changes ComReg will manage, while not losing sight of the important work we must carry on doing on a day-to-day basis.

### Connectivity, competition and investment

We promote competition, which is a key driver of both innovation and investment in high-speed telecommunications networks, and we ensure the efficient management and use of radio frequency spectrum to deliver widespread access to world class connectivity and communications

### Consumer protection and empowerment

We empower and protect consumers to choose and use communications services with confidence

### Cybersecurity and resilience

We will enhance cybersecurity and resilience by engaging with entities in sectors within scope using the powers available to us to assess their compliance with the NIS2 Directive, upon transposition, and the CER Directive, as transposed

### Compliance and enforcement

We promote compliance by operators and regulated entities with their regulatory obligations and where necessary, exercise our powers to review, audit, and take enforcement action to address non-compliance and deter further breaches

### Our organisation

ComReg is changing. As our mandate evolves to encompass new responsibilities, we will prioritise organisational development to ensure that we perform efficiently at scale and deliver effective outcomes



## 5.2 Strategic Priorities

### 5.2.1 Strategic Priority 1

#### Connectivity, competition and investment

5.2 We promote competition, which is a key driver of both innovation and investment in high-speed telecommunications networks, and we ensure the efficient management and use of radio frequency spectrum to deliver widespread access to world class connectivity and communications.

5.3 We will accomplish this strategic priority by implementing three goals.

##### **Goal 1**

We use the tools at our disposal to help achieve the digital connectivity targets set out in the Government's Digital Connectivity Strategy.

##### **Goal 2**

We promote efficient commercial investment in infrastructure and services by providing regulatory certainty and by using the tools at our disposal to create competitive incentives.

##### **Goal 3**

We promote effective and sustainable competition in retail and wholesale markets. We work towards deregulating markets where possible and levy economic regulation on markets only where there is strong and persistent evidence that competition is not working to benefit users, arising from the presence of SMP.

### 5.2.2 Strategic Priority 2

#### Consumer protection and empowerment

5.4 We empower and protect consumers to choose and use communications services with confidence.

5.5 We will accomplish this strategic priority by implementing four goals.

##### **Goal 4**

We advocate effectively for consumers. We identify and understand consumer harms, assess consumer needs, and raise awareness of and implement rights and protections to mitigate those harms.

##### **Goal 5**

We empower and support consumers by ensuring that they have easy access to the information and tools they need. These should be clear, accurate, understandable, and up to date.

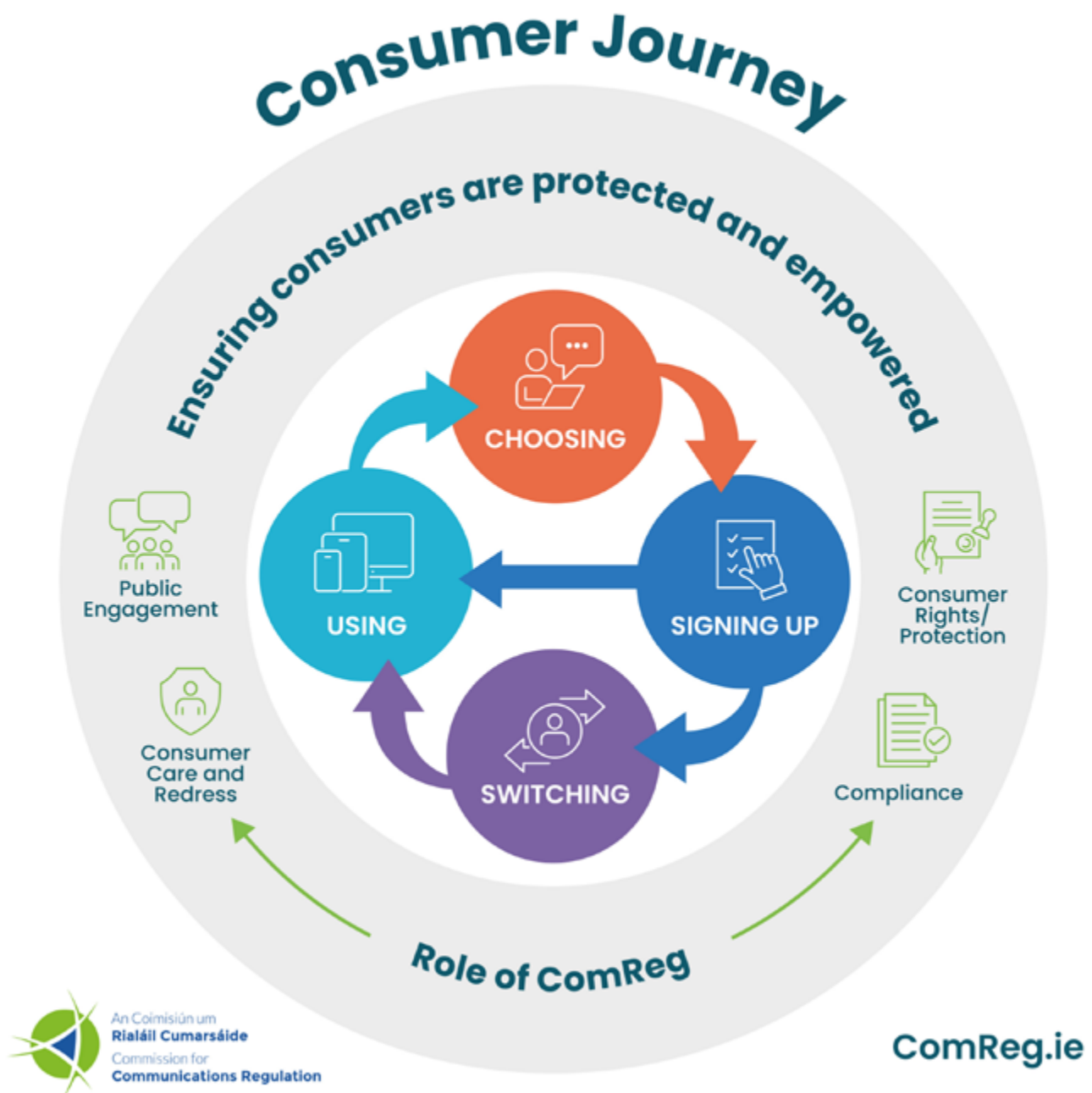


### Goal 6

Service providers proactively uphold consumer rights. Consumers have access to timely and effective customer care, complaint handling, and redress mechanisms.

### Goal 7

Service providers protect the interests of, and provide for the needs of, disabled and vulnerable end users.



### 5.2.3 Strategic Priority 3

#### Cybersecurity and resilience

- 5.6 We will enhance cybersecurity and resilience by engaging with entities in sectors within scope using the powers available to us to assess their compliance with the NIS2 Directive, upon transposition, and the CER Directive, as transposed.
- 5.7 We will accomplish this strategic priority by implementing the following goal.

##### **Goal 8**

Entities are required to have appropriate risk-based security measures and procedures in place to manage cybersecurity and resilience risk. We will supervise those entities by monitoring and assessing risks to their cybersecurity and resilience, and we will act quickly to require them to take action where appropriate.

### 5.2.4 Strategic Priority 4

#### Compliance and enforcement

- 5.8 We promote compliance by operators and regulated entities with their regulatory obligations and, where necessary, exercise our powers to review, audit, and take enforcement action to address non-compliance and deter further breaches.
- 5.9 We will accomplish this strategic priority by implementing three goals.

##### **Goal 9**

We maximise our effectiveness by using fair, objective and risk-based processes and criteria to carry out our compliance and dispute resolution roles, and to prioritise and target our investigations.

##### **Goal 10**

We promote a culture of compliance amongst operators and regulated entities, and we encourage them to be proactive in ensuring compliance with their regulatory obligations.

##### **Goal 11**

Our powers are sufficient to allow us to incentivise and monitor compliance, and to deter non-compliance.

## 5.2.5 Strategic Priority 5

### Our organisation

- 5.10 ComReg is changing. As our mandate evolves to encompass new responsibilities, we will prioritise organisational development to ensure that we perform efficiently at scale and deliver effective outcomes.
- 5.11 We will accomplish this strategic priority by implementing four goals.

#### **Goal 12**

We will endeavour to resource our organisation to deliver on our expanded mandate while continuing to deliver our existing responsibilities. As we change, we will regularly review our policies, processes and systems to ensure that they continue to support us in delivering on our mandate, mission, and vision, while meeting the highest standards of corporate governance.

#### **Goal 13**

We will endeavour to ensure that we have people with the appropriate skills to deliver ComReg's mandate by training existing staff, and also through external recruitment.

#### **Goal 14**

We have a deep understanding of the sectors we regulate and will develop a deep understanding of the sectors we are likely to shortly be active in. This will enable us to deliver robust decisions, effective analysis, and informed action, using the best available evidence, including timely and relevant data.

#### **Goal 15**

We will engage proactively with all of our stakeholders – both across our existing responsibilities, and new stakeholders within our expanded remit.

## 6. Strategy delivery and reporting

- 6.1 ComReg's Strategy Statement articulates, at a high level, how we will execute our mission in accordance with our mandate and in pursuit of our vision over the coming years. Each of our five Strategic Priorities identifies key goals which are the intended outcomes of this Strategy Statement. ComReg also has a number of statutory reporting obligations against its Strategic Priorities and Goals.
- 6.2 The Communications Regulation Act 2002 was amended in 2023. Section 31D of the Act now requires ComReg to report annually to the Minister on the state of electronic communications markets, on the decisions we issue, on our resourcing, and on how those resources are attributed.
- 6.3 Separately, we are obliged under s.32(3) of the Act to report in each year's Annual Report on our proposed work programme for the following year, **with reference to progress on the strategy statement.**
- 6.4 Finally, we are mandated under s.31B of the Act to prepare an annual action plan setting out the principal activities that we propose to undertake, **having regard to our strategy statement. Our strategy statement therefore informs our annual action plan**, which will link specific actions to the associated Strategic Priorities and Goals set out in this Strategy Statement.

**An Coimisiún um Rialáil Cumarsáide**  
**Commission for Communications Regulation**

1 Lárcheantar na nDugaí, Sráid na nGildeanna, BÁC 1, Éire, D01 E4X0.  
One Dockland Central, Guild Street, Dublin 1, Ireland, D01 E4X0.

Teil | Tel +353 1 804 9600

Rphost | Email [strategy@comreg.ie](mailto:strategy@comreg.ie)

Suíomh | Website [www.comreg.ie](http://www.comreg.ie)