



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Emergency Call Answering Service

Call Handling Fee Review for 2026-2027

Consultation

Reference: ComReg 25/75
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Chapter 1

1 Introduction

- 1.1 In Ireland, emergency services are contacted by dialling 999 or 112, and such calls are initially received by the Emergency Call Answering Service ("ECAS").
- 1.2 In accordance with relevant Irish legislation¹, emergency calls are free of charge to the caller on all networks.
- 1.3 On 12 February 2018, the Minister for Communications, Climate Action and Environment² ("the Minister") awarded a contract to BT Communications Ireland Ltd ("BT") with respect to the ECAS. This contract known as "the Agreement" is between the two parties alone.
- 1.4 The ECAS is funded entirely through the Call Handling Fee ("CHF"). This is a fee payable by the presenting Electronic Communications Network ("ECN") operator and/or the Electronic Communication Service ("ECS") provider whenever their customers make an emergency call to the ECAS.
- 1.5 ComReg is required to annually review the maximum CHF that may be charged by the ECAS operator³.
- 1.6 The following table shows the CHF applicable in each year since the signing of the Agreement:

Table 1: CHF values since the signing of the Agreement

Period	CHF	Document
Up to 2020	€3.93	Agreement between the Minister and BT
2020/2021	€1.77	ComReg Document No. 20/03
2021/2022	€2.83	ComReg Document No. 21/02

¹ Regulation 93(1) of S.I. No. 444 of 2022 European Union (Electronic Communications Code) Regulations 2022

² The Department of Communications, Climate Action and Environment (DCCAE) became the Department of Environment, Climate and Communications ("DECC") in September 2020. It became the Department of Culture, Communications and Sport ("DCCS") in June 2025.

³ Section 58(D)(I) of the Communications Regulation Act, 2002, as amended ("the Act")

2022/2023	€2.98	ComReg Document No. 22/01
2023/2024	€3.78	ComReg Document No. 23/05
2024/2025	€3.12	ComReg Document No. 24/03
2025/2026	€3.93	ComReg Document No. 25/02

- 1.7 This consultation, by ComReg, concerns the maximum chargeable CHF applicable from 12 February 2026 to 11 February 2027, the latter date being the ninth anniversary of the date on which the Agreement was entered into, in accordance with Section 58D(1) of the Act.
- 1.8 The Agreement was due to expire in November 2025.⁴ In June 2025, due to developments in the public procurement process for the upcoming ECAS operator and in line with the current contract, DCCS requested continuation services to assist with the migration of the service, extending up to a period of 24 months (i.e. no later than 24 November 2027).
- 1.9 This extension means that pursuant to the Act, two further CHF reviews may be required;
- (a) this consultation; and
 - (b) a further consultation in Q4 2026 to determine a CHF from February 2027 terminating in, or before, November 2027.
- 1.10 The cost base of the ECAS has been assessed by ComReg for this purpose. During the review, an assessment of reasonable costs was also undertaken. ComReg has been assisted by its consultants, Analysys Mason, in carrying out its review (See ComReg Document 25/75a).
- 1.11 Having concluded its analysis of reasonable costs and forecast call volumes, as set out below, ComReg proposes that the CHF to be applied from 12 February 2026 ("2026 CHF") will be **€3.96**. This proposed CHF will run to 11 February 2027.
- 1.12 The proposed CHF of €3.96 is slightly higher than the original CHF of €3.93 contained in the Agreement. While discussed in more detail in subsequent chapters the €0.03 increase is largely a result of the following factors:
- (a) Additional expenditure was required on NG eCall;

⁴ ComReg 23/101

- (b) Overall operating costs have declined marginally even though there was an upgrade to a dedicated circuit previously based on TDM technology.
- (c) While an increase in call volumes is forecast it is not expected to absorb all of the cost changes. In previous CHF reviews cost changes were absorbed over a longer period of time, thereby reducing the impact on the CHF.

1.13 The evolution of the CHF from the Agreement to now is as follows:

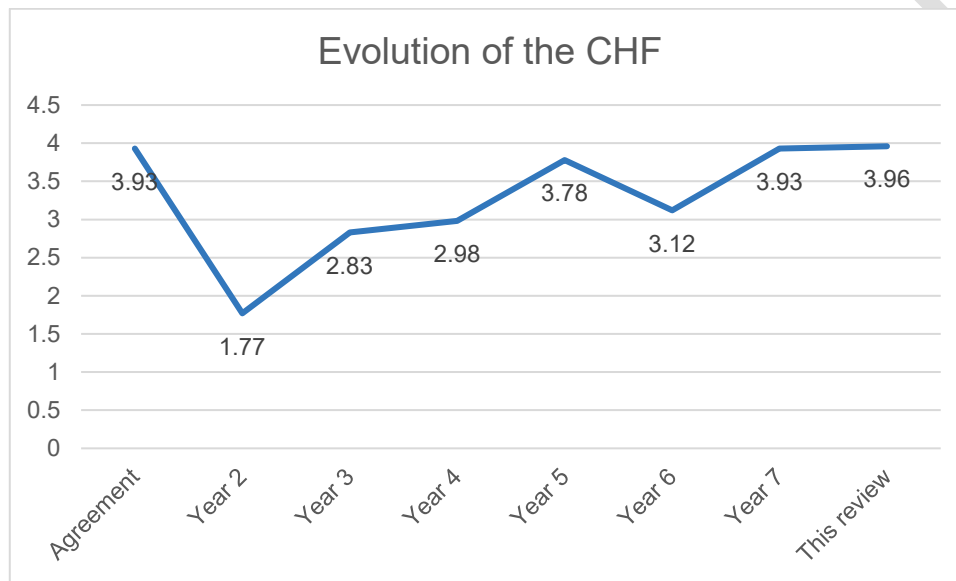


Figure 1: Evolution of the CHF

- 1.14 ComReg is required to complete its review by 12 December 2025. If, by that date, it appears that the expected rate of call annual volumes will differ from the current forecast of 2.25m calls ComReg may further adjust the CHF calculation accordingly.
- 1.15 ComReg may publish responses to this consultation in due course in accordance with its policy. Respondents are therefore asked to provide confidential and non-confidential versions of any document in respect of which any confidentiality is claimed (e.g. commercially sensitive information). In this respect, please see ComReg's Consultation Procedure Guidelines (ComReg 24/04)⁵ and Guidelines on the Treatment of Confidential Information (ComReg 05/24).

⁵ <https://www.comreg.ie/publication/consultation-procedure-guidelines>

Chapter 2

2 Movement in the proposed CHF

2.1 The following are the significant movements in the proposed CHF.

Table 2: Movements in the proposed CHF

2025 CHF	€3.93
Operating costs	€<
Depreciation	€<
Increase in call volumes	€<
2026 CHF	€3.96

Operating costs

- 2.2 Underlying operating costs have largely remained static. There have been marginal increases and decreases throughout all categories.
- 2.3 While there is an anticipated increase in call volumes the ECAS operator considers that these can be handled through its existing staffing levels and there is no consequent increase in operator costs.
- 2.4 A 15-year-old circuit that was based on TDM technology has had to be replaced. The new circuit provides greater resilience and is dedicated to the ECAS. It is based on a monthly rental charge and there is no capital element to it.
- 2.5 Real Time Text (“RTT”) is live, and the ability of the platform to receive NG eCall is required to be live in January 2026, with some additional operating costs required to support them.

Depreciation

- 2.6 Further additional capital expenditure was required to implement NG eCall⁶ and ensure it is fully supported by January 2026. This additional cost is being written off over the remaining life of the Agreement.

⁶ Next Generation eCall is an evolution of the existing eCall service that is based on IMS using 4G/5G technology. With NG eCall, the IMS emergency call, as specified in 3GPP Release-14, is used. See [here](#) for further information. See also Commission Delegated Regulation (EU) 2024/1084

Increase in call volumes

- 2.7 As discussed in Chapter 4 an increase in call volumes has been forecast which reduces the cost per call.

Sinking Fund contribution

- 2.8 ComReg understands that DCCS is not returning further contributions as it considers it more appropriate to retain funds to support the transition from BT to the new ECAS operator.

Monitoring Costs

- 2.9 ComReg can confirm that its monitoring costs⁷ associated with the carrying out of this review are not, at this time, being recovered through the CHF.

⁷ Section 58 (E) of the Act

Chapter 3

3 Reasonable Costs

- 3.1 As part of this review ComReg has reviewed the costs incurred by BT under the Agreement to determine whether or not they are considered reasonable. In conducting its review ComReg has had extensive interaction with BT.
- 3.2 As in previous years, ComReg has visited the two call centres in Ballyshannon and Navan as part of this review.

Comparison of 2026 CHF costs with 2025 CHF costs

- 3.3 ComReg has compared the ongoing costs as estimated by BT up to the end of the term and compared them to the costs from the 2025 CHF review⁸. The variances are discussed in further detail below.

Table 3: Movements in the ECAS cost categories

Cost Categories	€'000
2025 CHF review – Ongoing costs ⁹	€3<
Salary costs	€3<
Depreciation	€3<
Other cost categories	€3<
Total cost movement	€3<
2026 CHF review - Ongoing costs	€3<

- 3.4 Total running costs of the ECAS from the 2026 CHF review are expected to be €3< m. These costs include depreciation and exclude the Sinking Fund.

⁸ In the 2025 CHF review total ongoing costs from the start of the contract to its completion were €3<. Over the various reviews these costs had been assessed and were considered reasonable. With the extension to the Agreement costs for a further 18 months are required. Therefore, the total costs of ECAS (II) to the end of the Agreement are now estimated at €3<, an increase of €3<. The costs included in the 2026 CHF review are considered reasonable. The cost estimate for the final period do not vary significantly from the 2026 CHF review but will be considered for reasonableness for the 2027 CHF review.

⁹ Including depreciation

3.5 These main variations in costs are discussed below.

Salary costs

3.6 There has been minimal change in salary costs. There have been some increases in accordance with inflation while there has been some reduction in other roles and consolidation of activities.

3.7 While increased calls per annum are forecast for the coming period, this will not have a linear relationship with staffing requirements. BT is of the view that its current staffing levels are sufficient to maintain call quality and to adhere to the standards as set out in its contract with the DCCS. This is consistent with when there has been a decline in call volumes. Where there has been a decline as the ECAS is required to maintain certain minimum staffing levels regardless of call volumes there has not been a commensurate reduction in staffing levels.

Depreciation

3.8 The increase in depreciation reflects additional costs incurred to ensure the operation of NG eCall which, in accordance with legislative requirements, has to be fully supported by Q1 2026. These costs will be written off over the remaining life of the Agreement.

All other costs

3.9 There have been some minor increases in the other cost categories. For example:

- (a) There are some additional operating costs associated with supporting NG eCall and RTT as opposed to the capital costs noted above;
- (b) The end-of-life requirement to replace the TDM circuit has allowed for greater resilience and capacity. It is a dedicated circuit and maintenance of which is being kept in-house thereby reducing the risk of over reliance on a third-party supplier.

3.10 ComReg is of the preliminary view that the costs incurred by the ECAS are reasonable.

Impact of extension of term

It should be noted that no additional costs have been added to the CHF in anticipation of the move from ECAS (II) to a future ECAS (III) or with the transition from BT to a new ECAS operator. The costs in the CHF model reflect those of the ECAS under “business as usual” circumstances.

Chapter 4

4 Volumes

- 4.1 As discussed above, annual volumes to September 2025 are currently c. 2.2m per annum and the movement in actual calls is reflected in Figure 2 below:

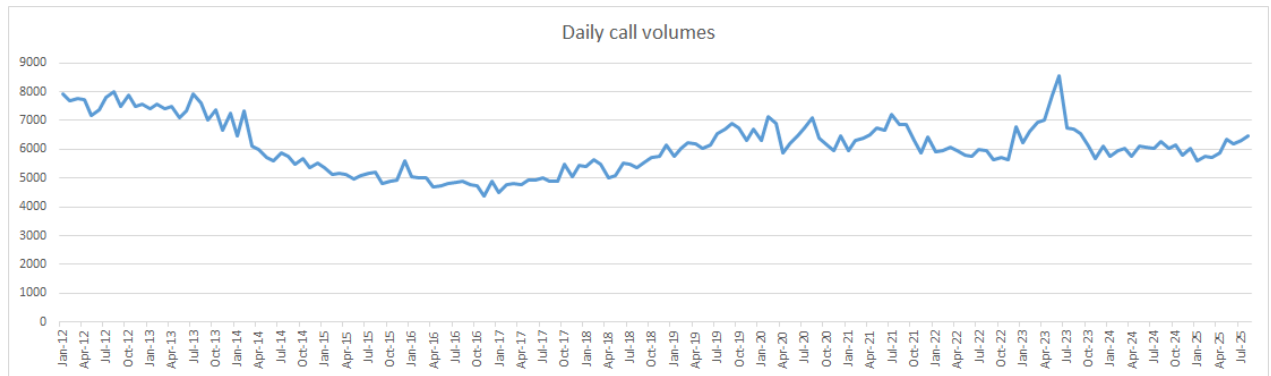


Figure 2: ECAS monthly call volumes July 2010 to September 2025

Source: BT

- 4.2 This includes all call categories:
- Normal – calls are connected to an emergency service.
 - Noisy – calls are generated from technical faults, mainly on fixed line networks.
 - Abandoned – calls of an extremely short duration to the extent that the call operator does not have time to interact with the call.
 - Silent – Calls, while reaching an operator, have often been dialled in error. Examples of this are pocket dials or other inadvertent call.
 - Other – this covers several categories such as nuisance calls.
- 4.3 The following are graphical representations of these categories since 2012 and their projection to the end of the contract in November 2027.

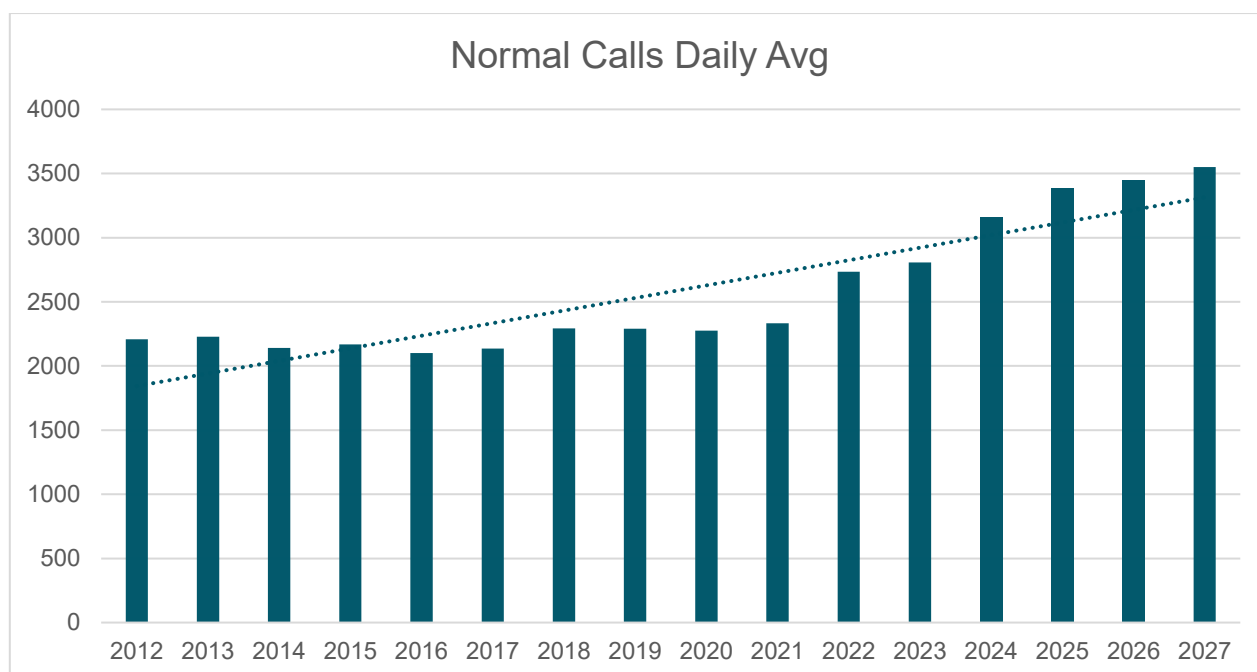


Figure 3: Normal calls

Source: BT

4.4 Normal calls have shown a general upward trend. There are four main drivers for this:

- (a) General economic activity is a significant driver as more people and vehicles are out on the roads;
- (b) Ireland's population has seen significant growth in recent years. In addition, the age profile is also changing with an increasing older population who may be more dependent upon the emergency services;
- (c) In previous years there were some increases in call volumes due to technological matters. However, at times these increases often reversed in subsequent periods. The projections do not reflect any increases in volumes due to possible technological changes.
- (d) The ECAS operator has noticed that call volumes can increase with adverse weather in the winter, with storms and flooding, but also during fine summer weather when more people are out and about. There was an increase in call volumes during summer 2025 over the level predicted in the 2025 consultation. The call volumes forecast to the end of the contract takes a conservative approach to weather related call volumes as there is a distinct level of unpredictability to forecasting these.

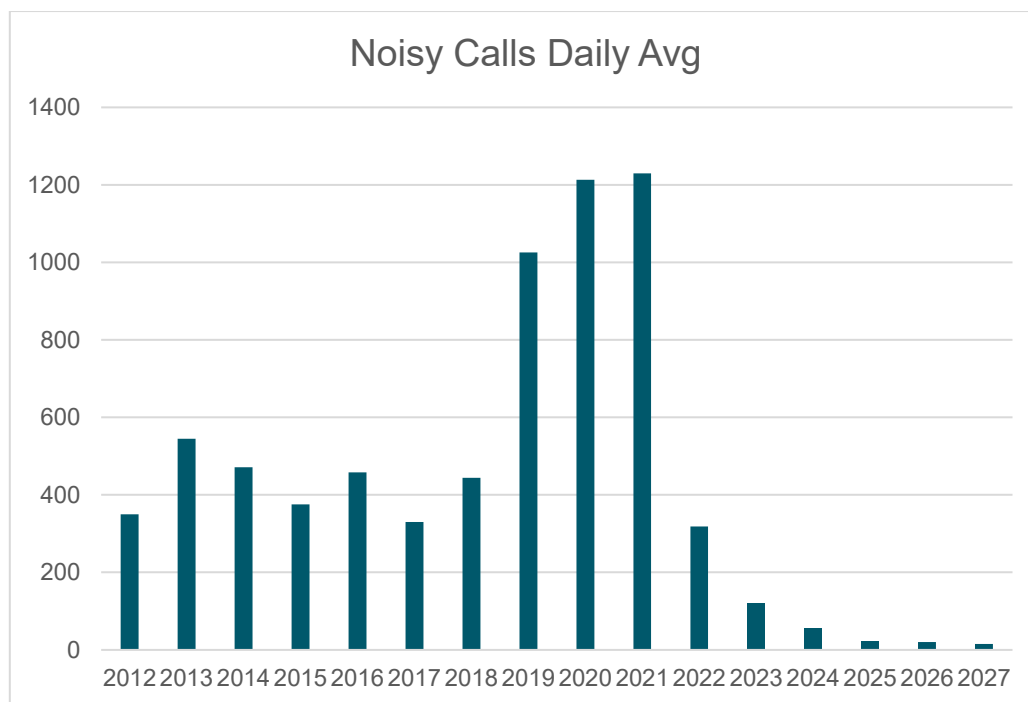


Figure 4: Noisy Calls

- 4.5 ComReg understands that the reduction in noisy calls is mainly as a result of migration from copper. There has been a distinctive change in this category and it no longer has a significant impact on call volumes.

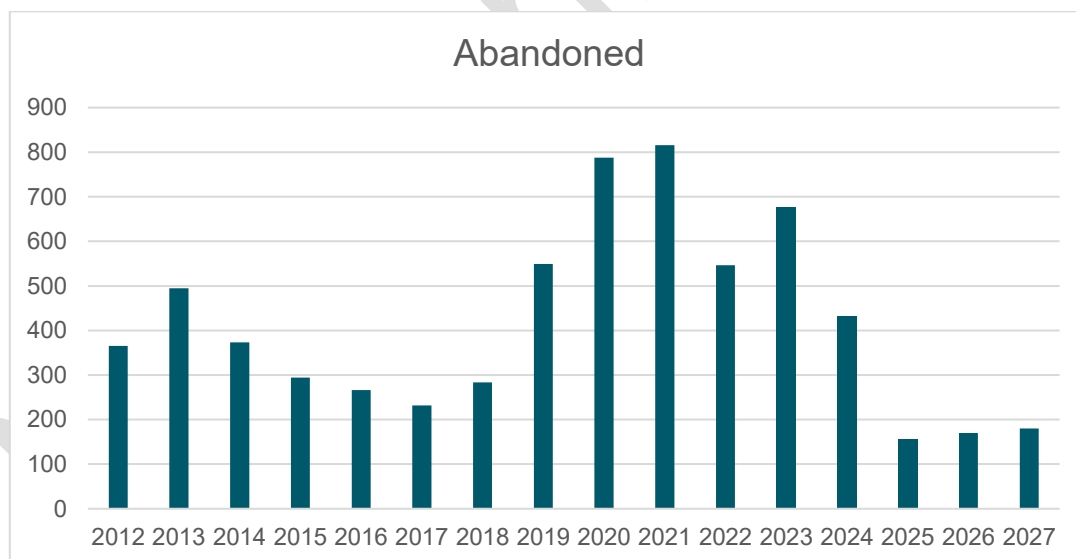


Figure 5: Abandoned calls

- 4.6 Abandoned calls tend to reflect the overall number of calls presented to the ECAS.

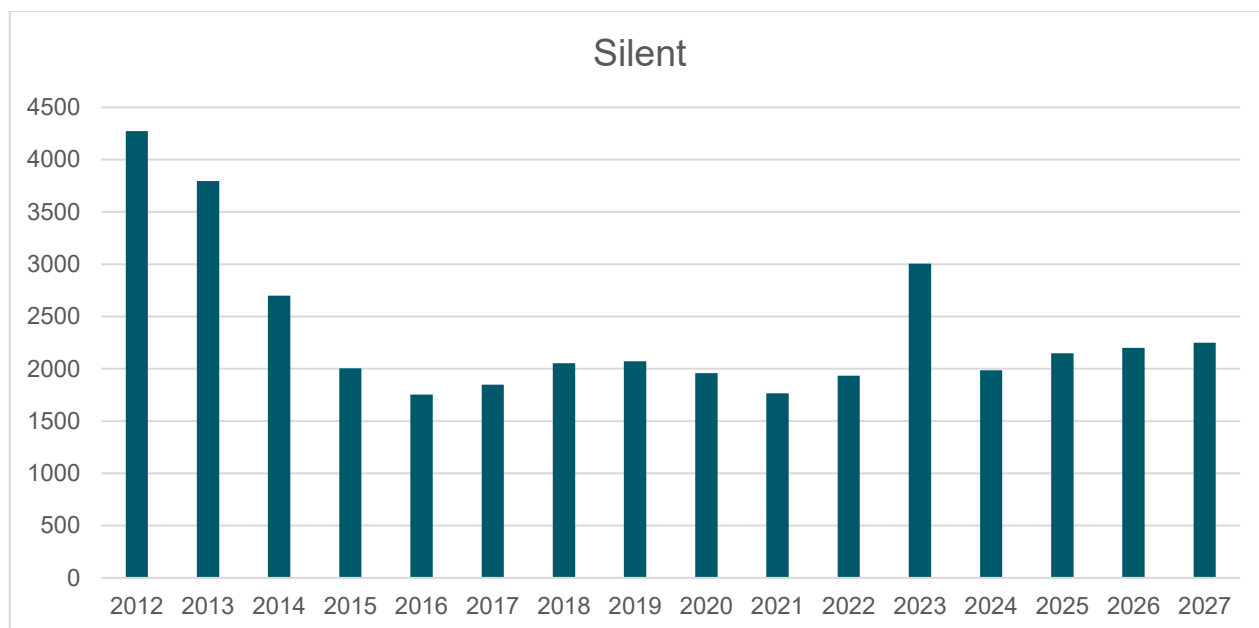


Figure 6: Silent calls

- 4.7 Silent calls tend to correlate with normal calls, although there was a significant increase in 2023 associated with the software issue on Android handsets.

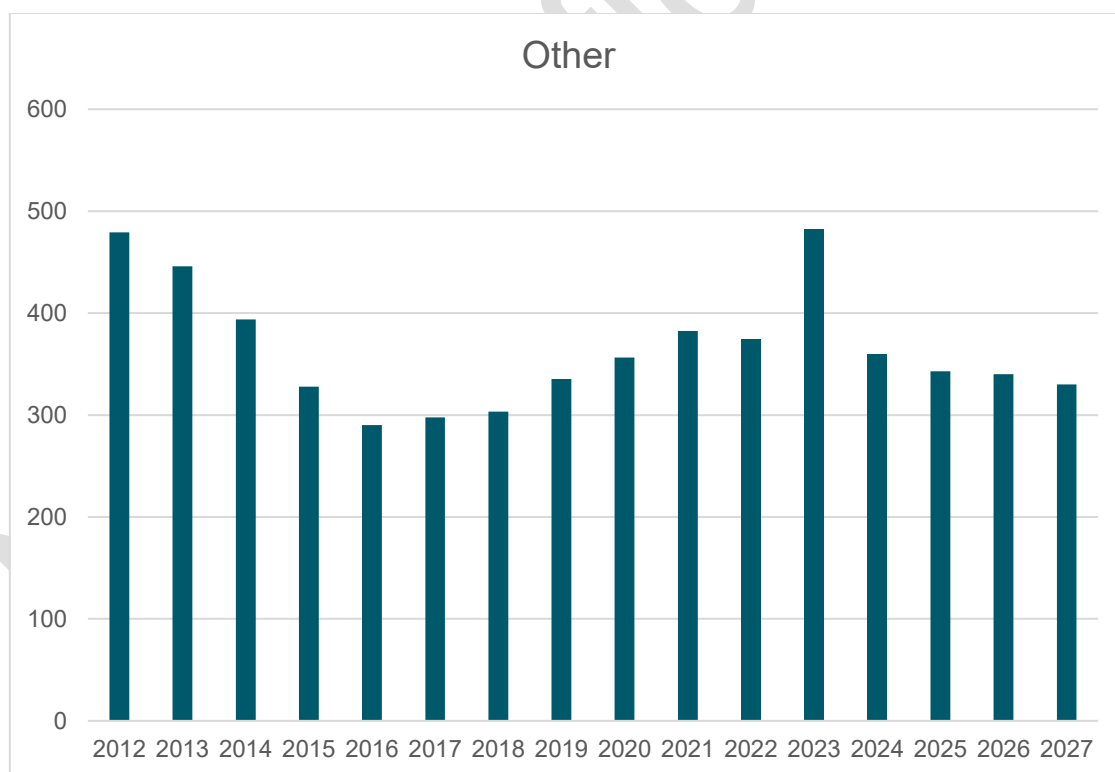


Figure 7: Other calls

- 4.8 ComReg is of the preliminary view that annual call volumes will be c. 2.25m per annum a slight increase on the 2.2m calls handled in the 12 months to September 2025.

- 4.9 ComReg publishes regular information notices on ECAS call volumes. Table 4 below (which is taken from ComReg Information Notice No. 25/48) shows the differences in monthly call volumes between January 2025 and June 2025 when compared to the same period in 2024.

Table 4: Call volumes January 2024 to June 2024 v January 2025 to June 2025

	2024	2025	Difference	% difference
January	177,025	171,127	-5,898	-3.3%
February	171,065	159,723	-11,342	-6.6%
March	185,058	175,075	-9,983	-5.4%
April	171,599	174,801	3,202	1.9%
May	187,862	196,881	9,019	4.8%
June	180,893	185,993	5,100	2.8%
January to June Total	1,073,502	1,063,600	-9,902	-0.9%

Source: BT

- 4.10 Call volumes for July to September 2024 compared to July to September 2025 were:

Table 5: Call volumes July to September 2025 v July to September 2024

	2024	2025	Difference	% Difference
July	185,651	195,819	10,168	5.5%
August	192,628	200,907	8,279	4.3%
September	179,339	184,016	4,677	2.6%
July to September Total	557,618	580,742	23,124	4.1%

Source: BT

- 4.11 While there was a decline in volumes in the first half of 2025 compared to 2024 within this Q1 2025 saw a decline while Q2 2025 saw an increase. This increase has continued into Q3 2025.
- 4.12 Given the unpredictability of call volumes (and their bursty nature) there can be

significant variations month-on-month. BT, through its analysis of the different call types, has predicted that there will be annual call volumes of c. 2,250,000 for the 2026 CHF. This is an increase of c. 50,000 forecast calls per annum.

- 4.13 ComReg is of the preliminary view that it is prudent to increase the forecast call volume to 2,250,000 calls per annum for the 2026 CHF and to the end of the contract.
- 4.14 ComReg welcomes the views of respondents regarding volume predictions.

- Q. 1 Please provide any comments you may have in relation to forecast call volumes for the 2026 CHF. Please provide detailed reasoning and accompanying calculations (where appropriate) supporting your submission.
- Q. 2 Are there any matters which you wish to raise as part of this review? Please provide detailed reasoning and accompanying calculations (where appropriate) supporting your submission.

Chapter 5

5 Draft Decision Instrument

Definitions

5.1 In this determination:

"*the Act*" means the Communications Regulation Act 2002(as amended);

"*the Commission*" means the Commission for Communications Regulation established under section 6 of the Act;

"*emergency call*" has the same meaning as in section 58A of the Act; and

"*the emergency provider*" means BT Communications Ireland Limited.

Determination

5.2 The Commission makes this determination:

- In exercise of its powers under section 58D (2) of the Act;
- Pursuant to the review conducted by it under section 58D (1) of the Act;
- Having had due regard to section 58D (3) of the Act;
- Pursuant to Commission Document No. 25/XX and Commission Document No. 25/XXa;
- Having duly taken account of the responses received to Commission Document No. 25/XX and Commission Document No. 25/XXa; and
- Having regard to the reasoning and analysis conducted by the Commission and set out in this response to consultation and determination.

5.3 The Commission hereby determines that for the period from 12 February 2026 to 11 February 2027 the maximum permitted call handling fee that the emergency provider may charge to entities who forward emergency calls to it for handling such a call shall be €X.XX.

5.4 This determination is effective from the date of the publication of this response to consultation and determination.

Q. 3 Do you agree or disagree with the wording of ComReg's Draft Determination?
Please provide detailed reasoning for your views.

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Chapter 6

6 Submitting Comments

- 6.1 The consultation period will run from 24 October 2025 to 24 November 2025, during which ComReg welcomes written comments. It is requested that comments be cross-referenced to the relevant question numbers from this document.
- 6.2 Having analysed and considered the comments received, ComReg may publish a response to consultation and decision in January 2026.
- 6.3 Responses must be submitted in written form (post or email) to the following address/email and clearly marked "Submission to ComReg 25/75":

Commission for Communication Regulation
One Dockland Central
1 Guild Street
North Dock
Dublin 1
D01 E4XO
Ireland

Email: retailconsult@comreg.ie

- 6.4 In order to promote further openness and transparency, ComReg will publish respondents' submissions to this consultation. However, ComReg must strictly maintain the confidentiality of any information provided to it in confidence. Electronic submissions should be submitted in an unprotected format so that they can be appended into the ComReg submissions document for publishing electronically.

Annex 1: Legal Basis

- A 1.1 Section 58 (A) - 58 (H) of the Communications Regulation Act 2002 (as inserted by section 16 of the Communications Regulation (Amendment) Act 2007 provides generally for the establishment of the ECAS and associated matters.
- A 1.2 Section 58 (D) obliges and empowers ComReg to review and determine the maximum permitted CHF on an annual basis.

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Annex 2: Questions

- Q. 1 Please provide any comments you may have in relation to forecast call volumes for the 2026 CHF. Please provide detailed reasoning and accompanying calculations (where appropriate) supporting your submission.
- Q. 2 Are there any matters which you wish to raise as part of this review? Please provide detailed reasoning and accompanying calculations (where appropriate) supporting your submission.
- Q. 3 Do you agree or disagree with the wording of ComReg's Draft Determination? Please provide detailed reasoning for your views.

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