



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Emergency Call Answering Service

Call Handling Fee Review for 2027-2028

Consultation

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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 Suíomh | Web www.comreg.ie

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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 Ltd³ ("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 operator⁴.
- 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

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 Subsequently transferred to BT Business Telecoms Ireland Limited

⁴ Section 58(D)(I) of the Communications Regulation Act, 2002, as amended ("the Act")

2021/2022	€2.83	ComReg Document No. 21/02
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
2026/2027	€3.96	ComReg Document No. 26/01

- 1.7 This consultation, by ComReg, concerns the maximum chargeable CHF applicable during the period of 12 months beginning 12 February 2027.
- 1.8 BT has divested its business in Ireland, and this has impacted the cost base. There will be a new ECAS provider and contract in due course. As previously noted⁵ by ComReg, the current ECAS contract which was due to expire in November 2025 was further extended until November 2027. ComReg understands that arrangements are being put in place to ensure the continued provision of the ECAS from that point but that these arrangements have not been finalised yet, and therefore they cannot currently be assessed in the context of the relevant legislation for the purpose of establishing the CHF for the relevant period.
- 1.9 When the arrangements have been finalised consideration will need to be given to any consequences they may have for the CHF.
- 1.10 The cost base of the ECAS, excluding the continuation of services, 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 26/71a).
- 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 2027 ("2027 CHF") will be **€3.82**. during the period of 12 months from February 2027.
- 1.12 The proposed CHF of €3.82 is c. 4% lower than the original CHF of €3.93 contained in the Agreement and which was set in 2018 by DCCS.
- 1.13 While discussed in more detail in subsequent chapters the €0.14 decrease is largely a result of a relatively stable cost base and a slight increase in actual call volumes

⁵ ComReg 24/84 and 25/75

over those previously forecast.

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

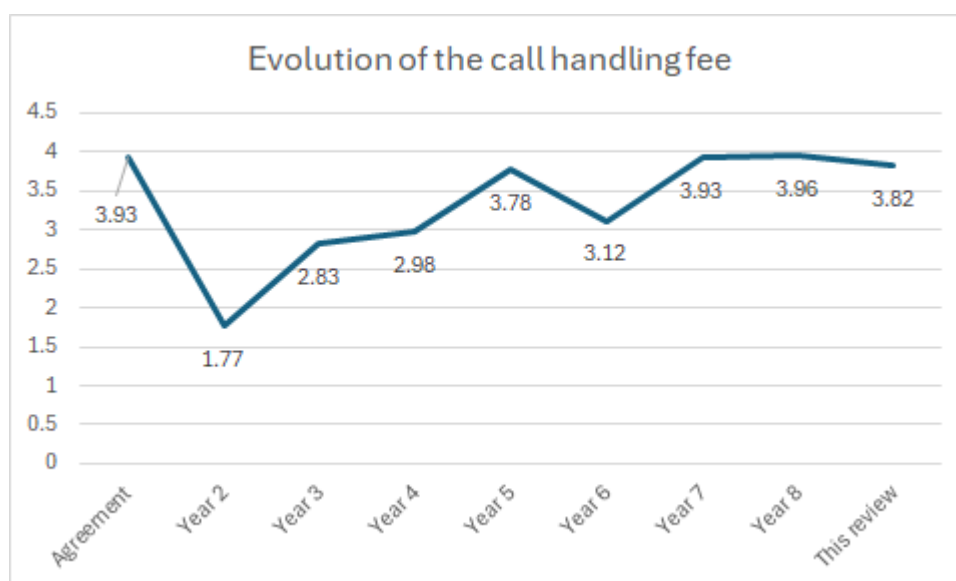


Figure 1: Evolution of the CHF

- 1.15 ComReg is required to complete its review by 12 December 2026. If, by that date, it appears that the expected rate of call annual volumes will differ from the current forecast of 2.34m calls ComReg may further adjust the CHF calculation accordingly.
- 1.16 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)⁶ and Guidelines on the Treatment of Confidential Information (ComReg 05/24).

⁶ <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

2026 CHF	€3.96
Operating costs	€✂
Depreciation	€✂
Increase in call volumes	<€✂>
2027 CHF	€3.82

Operating costs

2.2 There has been a slight increase in non-labour operating costs largely due to the divestment of the BT business in Ireland. Much of this increase has been offset by an increase in call volumes.

2.3 The anticipated increase in call volumes will drive a small increase in existing staffing levels. At the same time, the divestment of BT's business in Ireland has led to a reduction in costs of indirect support staff to the ECAS. The effect of the increase in direct staffing levels and a reduction in indirect support staff is a net increase in costs.

2.4 Premises costs have increased and comprise essential roof repairs in the Navan PSAP and also an increase in property management costs due to the divestment. These property management costs which were previously an internal BT charge are now being negotiated with a third party on a commercial basis.

2.5 Maintenance costs have also increased. Again, given the divestment the ECAS operator is now incurring costs on a commercial basis which were previously subject to an internal transfer. These include the integration of eircodes, the requirement for additional data storage and some technical upgrades due to end-of-life.

Depreciation

2.6 There is a minimal change in depreciation with the ECAS assets largely written off.

Increase in call volumes

- 2.7 As discussed in Chapter 4 a slight increase in call volumes has been forecast.

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 2027 CHF costs with 2026 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 2026 CHF review. The variances are discussed in further detail below.

Table 3: Movements in the ECAS cost categories

Cost Categories	€'000
2026 CHF review – Ongoing costs ⁸	€3<
Salary costs	€3<
Depreciation	€3<
Other cost categories	€3<
Total cost movement	€3<
2027 CHF review - Ongoing costs	€3<

3.4 The main variations in costs are discussed below.

Salary costs

3.5 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.

3.6 While increased calls per annum are forecast for the coming period, this will not have

⁸ Including depreciation

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.

- 3.7 Following the divestment of BT's Irish operations certain salary cost categories have decreased as the ECAS is now largely managed from the UK.

Depreciation

- 3.8 There has been a reduction in depreciation as many of the ECAS assets are coming to the end of their economic lives.

All other costs

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

- (a) Roof repairs were required in the Navan PSAP. Per the lease agreement these were not the responsibility of the landlord.
- (b) Some costs which previously were charged as BT internal transfers are now being charged more in line with commercial rates. The BT site in Clonsaugh was transferred as part of the divestment. As there is a test lab and standby call centre at that site the ECAS still needs access. The cost of the associated footprint is now charged on a per area commercial basis. A similar arrangement is now also in place for the two data centres in Ballymount and Citywest.
- (c) Most other cost categories are largely unchanged and are in line with expectation.

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

Chapter 4

4 Volumes

- 4.1 As discussed above, annual volumes to September 2026 are currently c. 2.32m per annum and the movement in actual calls is reflected in Figure 2 below:

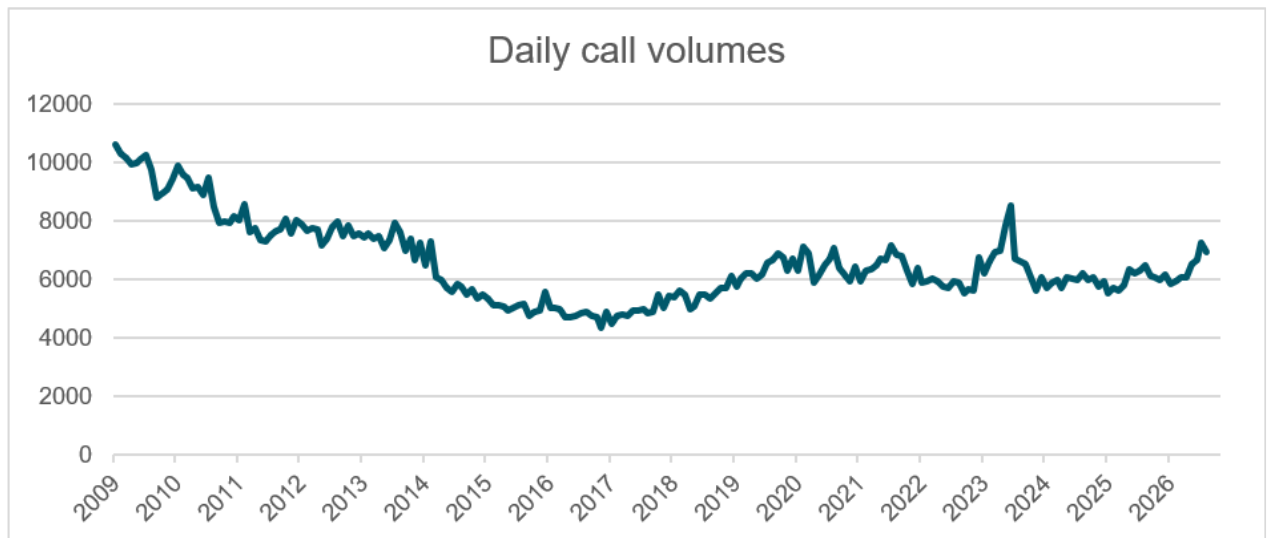


Figure 2: ECAS monthly call volumes July 2010 to September 2026

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 calls.
 - 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 2028 when a new ECAS operator is expected to be in place.

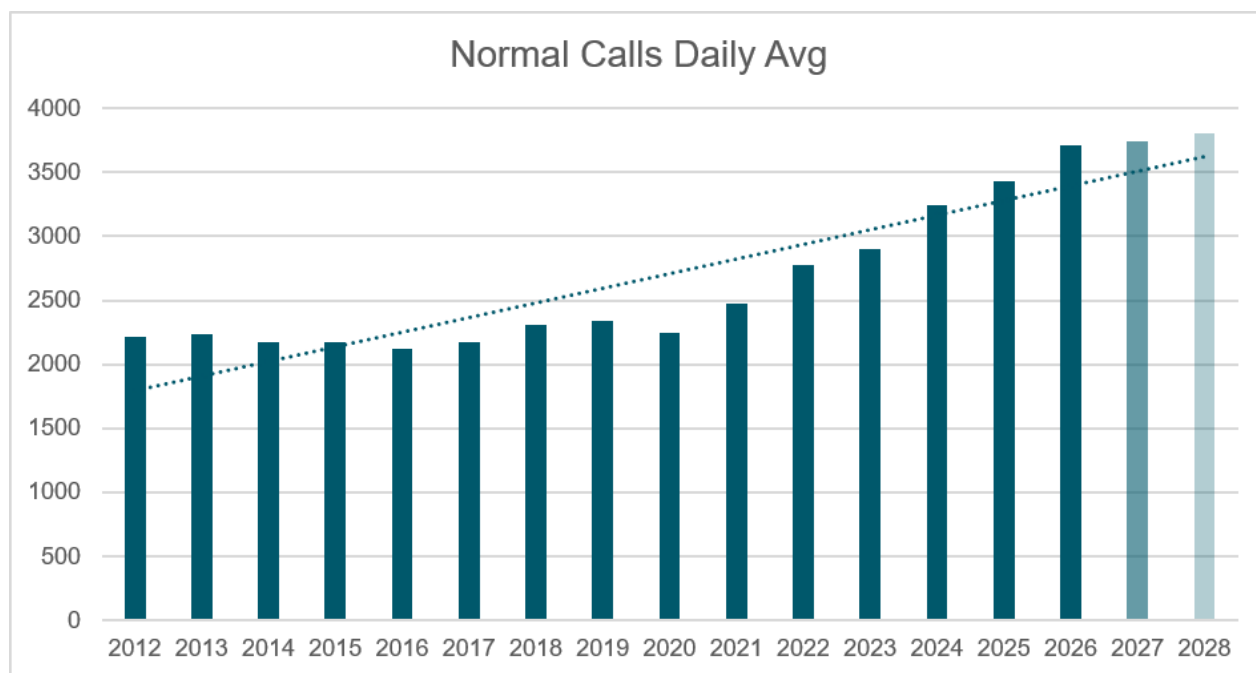


Figure 3: Normal calls

Source: BT

4.4 Normal calls continue to show 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, 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 observed that call volumes can increase with adverse weather. With increased weather warnings in winter, resulting at times with school and business closures, calls driven by adverse winter weather are stabilising. However, the ECAS operator has also noticed a significant increase in calls during periods of warm weather as more people are out and about and there is additional water-based activity. The call volumes forecast to the end of the contract takes a conservative approach to weather related call volumes.

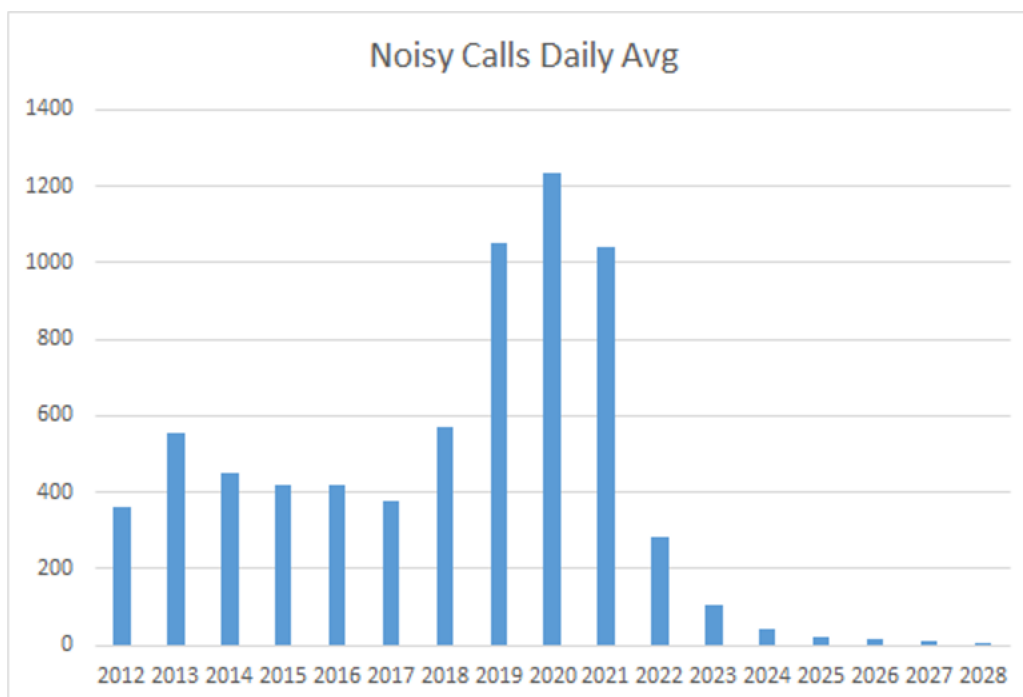


Figure 4: Noisy Calls

- 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.

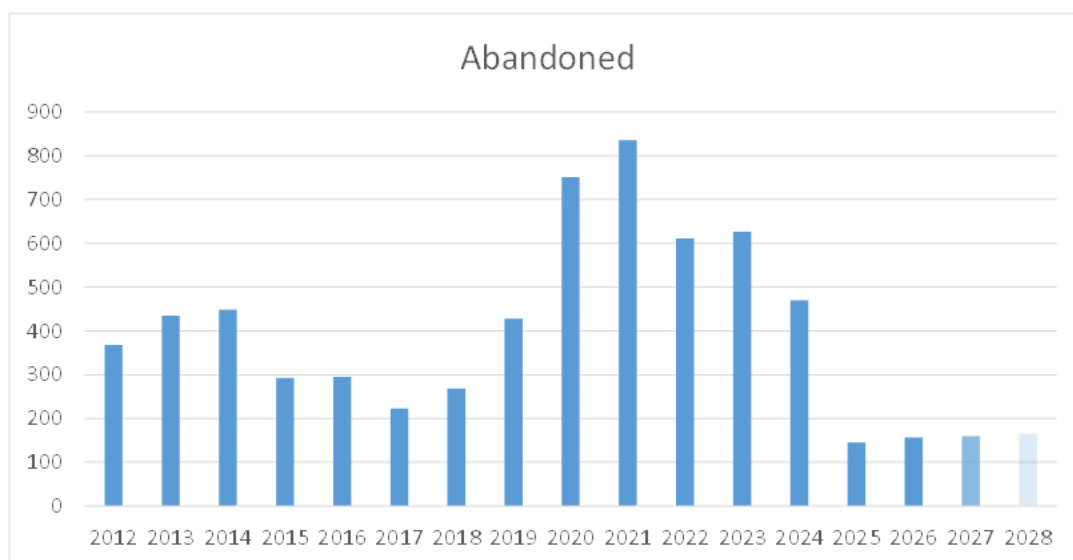


Figure 5: Abandoned calls

- 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.

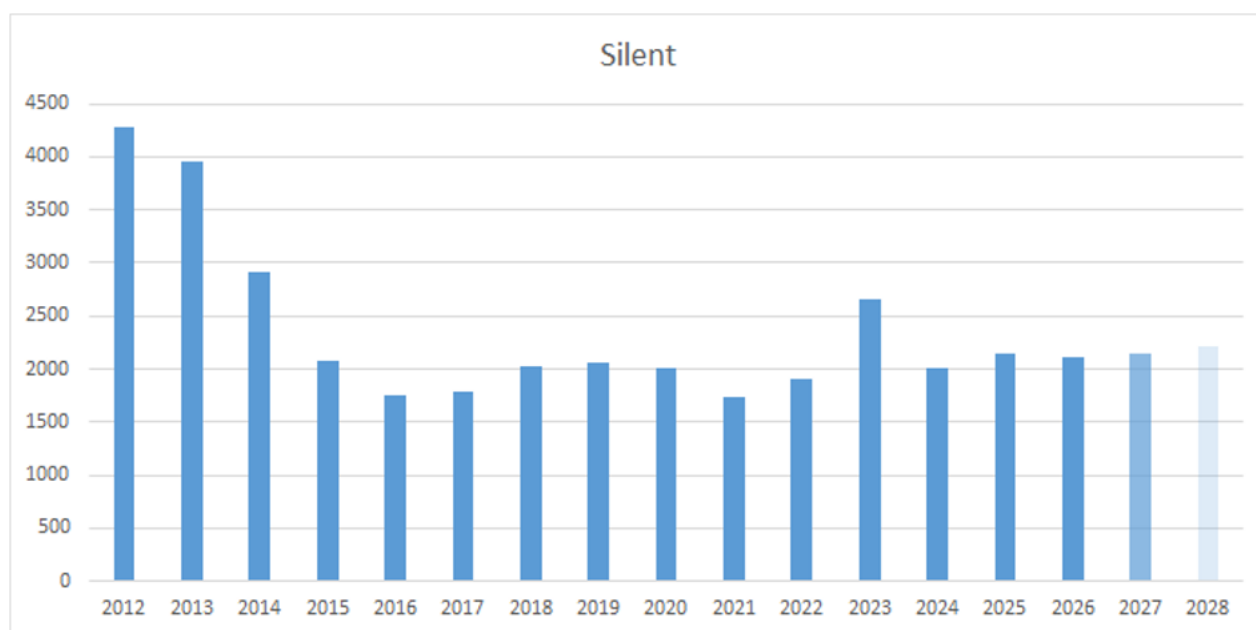
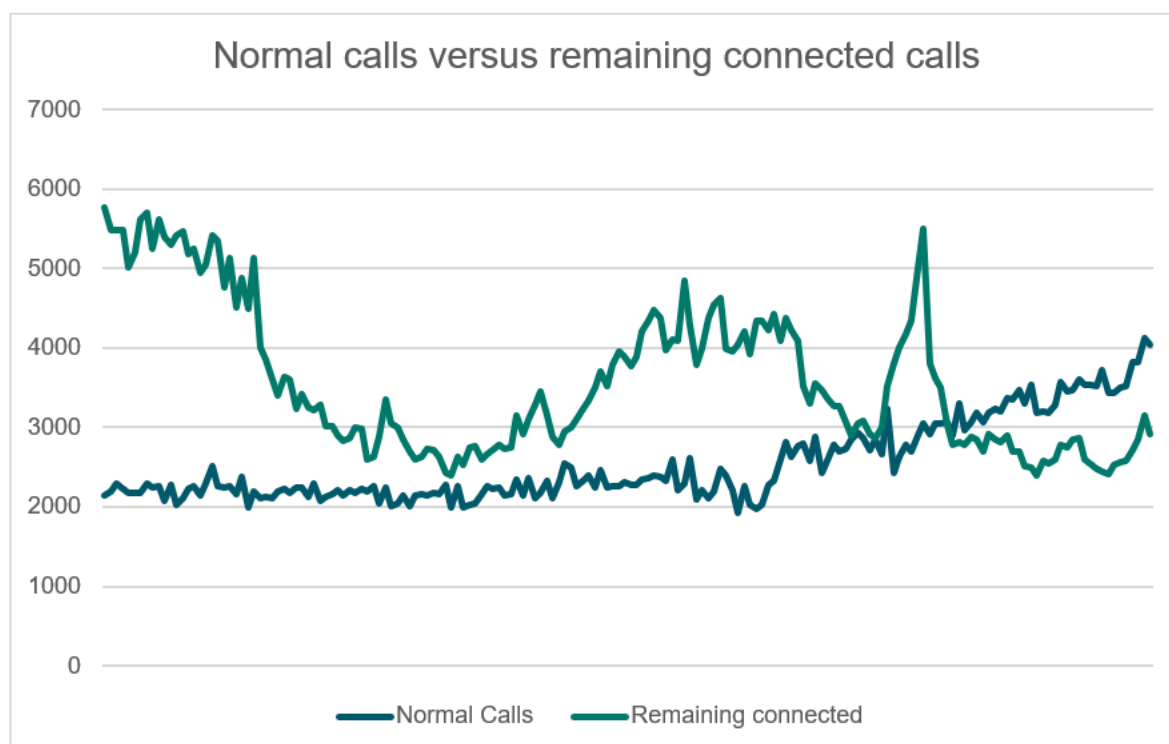


Figure 7: Other calls

- 4.8 Between the 2012 and September 2026 the ratio of normal calls and all other remaining calls connected to the ECAS has changed considerably.



- 4.9 More normal calls are now connected to an emergency service. Significant drivers in this change include the following:

- The removal of noisy calls through copper switch-off/fibre rollout and the removal of soft dial tones; and
- A transition from the use of fixed lines to call the ECAS to predominantly mobile.

4.10 ComReg is of the preliminary view that annual call volumes will be c. 2.34m per annum a slight increase on the 2.32m calls handled in the 12 months to September 2026.

4.11 ComReg publishes regular information notices on ECAS call volumes. Table 4 below (which is taken from ComReg Information Notice No. 26/52) shows the differences in monthly call volumes between January 2026 and June 2026 when compared to the same period in 2025.

Table 4: Call volumes January 2025 to June 2025 v January 2026 to June 2026

	2025	2026	Difference	% difference
January	171,127	180,848	9,721	5.7%
February	159,723	166,949	7,226	4.5%
March	175,075	187,827	12,752	7.3%
April	174,801	182,542	7,741	4.4%
May	196,881	202,431	5,550	2.8%
June	185,993	199,874	13,881	7.5%
January to June Total	1,063,600	1,120,471	56,871	5.4%

Source: BT

4.12 Call volumes for July to September 2025 compared to July to September 2026 were:

Table 5: Call volumes July to September 2026 v July to September 2025

	2025	2026	Difference	% Difference
July	195,819	225,279	29,460	15.0%
August	200,907	215,373	14,466	7.2%
September	184,016	200,289	16,273	8.8%

July to September Total	580,742	640,941	60,199	10.3%
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Source: BT

- 4.13 2026 has seen a continued increase in call volumes over 2025. As noted in paragraph 4.4 these include ongoing economic activity and an increase in population. A further significant factor in this review was the extended spell of fine weather during summer 2026. Between June 2026 and August 2026 there was an additional c. 58,000 more calls than forecast.
- 4.14 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. 2,340,000 for the 2027 CHF. This is an increase of c. 20,000 forecast calls per annum.
- 4.15 ComReg is of the preliminary view that it is prudent to increase the forecast call volume to 2,340,000 calls per annum for the 2027 CHF and to the end of the contract.
- 4.16 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 2027 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;

In this Decision Instrument terms used are as defined in the 2002 Act, unless the context otherwise admits or requires.

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. 26/XX and Commission Document No. 26/XXa;
- Having duly taken account of the responses received to Commission Document No. 26/XX and Commission Document No. 26/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 the maximum permitted call handling fee that the ECAS Operator may charge to entities who forward emergency calls to it for handling such a call shall be €X.XX during the period of 12 months beginning 12 February 2027.

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.

Chapter 6

6 Submitting Comments

- 6.1 The consultation period will run from 30 October 2026 to 30 November 2026, 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 2027.
- 6.3 Responses must be submitted in written form (post or email) to the following address/email and clearly marked “Submission to ComReg 26/71”:

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.

Annex 2: Questions

- Q. 1 Please provide any comments you may have in relation to forecast call volumes for the 2027 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.