



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Guidance on the use of AI in End-User Dispute Resolution

Information Notice

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Commission for Communications Regulation

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Additional Information

Related Publications	Document Number
End-user Dispute Resolution Procedures	ComReg 24/22aR1
Postal Dispute Resolution Procedures	ComReg 24/102a

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At the time of updating the Guidance, ComReg will explain and describe the changes to any updated versions of the document.

Legal Disclaimer

This Guidance sets out ComReg’s views on the use of AI in submissions made to it in relation to dispute resolution for users of electronic communications services, electronic communications networks or postal services only. It does not represent ComReg’s views on the use of AI in relation to the exercise of ComReg’s other statutory functions and powers. It does not limit ComReg’s discretion in carrying out its end user dispute resolution functions. ComReg will apply this guidance, as appropriate, when exercising its end user dispute resolution functions and powers, but it does not necessarily set out ComReg’s final or definitive position on particular matters i.e. it is not an exhaustive list. ComReg may decide, as circumstances dictate, to depart from this Guidance where justified. This Guidance does not replace any regulations or laws and does not amount to legal advice. Whilst this Guidance endeavours to set out ComReg’s views, ComReg’s powers and responsibilities are often subject to change and are likely to evolve over time. Depending on the specific circumstances of such change, ComReg may review and amend this Guidance as it sees fit, including to take account of legislative developments, case-law, guidance from relevant bodies, advancements in technology, or any other matters which may impact ComReg’s views.

1 Background to the Guidance

1. The Commission for Communications Regulation ("**ComReg**") undertakes formal dispute resolution of disputes between end-users of electronic communications services or networks ("**ECS**" and "**ECN**" respectively)¹ and their providers²; and disputes between postal service users and their postal service providers³.
2. Artificial intelligence ("**AI**") is already a part of everyday life in Ireland, operating in the background of many products and services used online, and is developing quickly.⁴ AI, when used appropriately, can be a powerful tool with many benefits.
3. ComReg is providing guidance on the use of AI by parties⁵ to disputes referred to it for resolution. The guidance covers all interactions in this context, including applications, submissions, supporting documents, correspondence and other communications with ComReg. This document sets out the background to why ComReg is introducing the guidance with the guidance set out in full at [Annex 1](#).

1.1 What is AI?

4. Artificial Intelligence (AI) can be described as the ability of a machine to display human-like capabilities such as reasoning, learning, planning and creativity.⁶ AI covers a wide range of technologies and tools that can vary significantly in their capabilities and applications.⁷
5. Generative AI ("**GenAI**") which is a subset of AI that many AI users will be familiar with, has been described as "*...technology or software capable of generating new content, including text, images, audio, video, data or computer code, typically in response to user prompts or instructions*".⁸ GenAI tools include software and online services accessible through mobile phones, computers and other devices which can generate text and content. Examples include ChatGPT, Claude, Google Gemini, Microsoft Copilot and AI-based websites and research tools e.g. Perplexity, Zapier, Grok.

¹ For the definitions of ECS and ECN see Part 1(2) of the European Union (Electronic Communications Code) Regulations ("ECC Regulations") [Online:] [S.I. No. 444 of 2022](#), published 12 September 2022

² In accordance with its published procedures 'End-user Dispute Resolution Procedures' [Online:] [ComReg24-22aR1.pdf](#)

³ In accordance with its published procedures 'Postal Dispute Resolution Procedures' [Online:] [ComReg-24-102a.pdf](#)

⁴ AI Office of Ireland [Online:] <https://aioffice.gov.ie/for-the-public/ai-in-daily-life/>

⁵ 'party'/'parties' can be an end-user or their representative and/or a provider in the context of an ECS/ECN dispute; or a postal service user or their representative and/or a postal service provider in the context of a Postal dispute.

⁶ European Parliament [Online:] ['What is artificial intelligence and how is it used?'](#)

⁷ Law Society of Ireland [Online:] [Generative AI Guidance](#)

⁸ Courts Service 'Practice Direction on the Responsible Use of Generative Artificial Intelligence in Court Documents' [Online:] ["Practice Direction HC142"](#)

1.2 Why provide guidance?

6. As noted, there are many **benefits associated** in the use of AI, when used appropriately, and in the context of dispute resolution these include:
 - Identifying and summarising issues of dispute;
 - Helping to set out the details of a dispute and in the drafting of correspondence and/or supporting information for a case;
 - Speeding up the process of setting out dispute details and provision of related information that may assist in that process;
 - Assisting in structuring thoughts, improving clarity and overcoming language or literacy barriers;
 - Assisting with formatting, spell-checking and similar functions; and
 - Helping people with neurodevelopmental differences to access services and communicate effectively.
7. However, and notwithstanding these benefits, ComReg has received contacts related to dispute resolution where it is evident that AI has been used to generate lengthy and/or complex submissions or other communications and where users have placed undue reliance on the accuracy of the AI generated content. Typically, additional time is required to review and verify the accuracy, completeness and relevance of such content. This can result in delays in the progression of cases.
8. ComReg notes in this regard that any party to civil proceedings in the Superior Courts in Ireland, including lay litigants, is generally required to limit written submissions to no more than 5,000 words⁹ in total.¹⁰
9. There are **recognised risks**¹¹ in using AI to assist in the preparation of submissions and other communications, including the following:
 - AI tools may generate information that appears plausible or authoritative but is inaccurate, incomplete, misleading, biased, outdated, and unreliable.
 - AI systems can produce "hallucinations", including fabricated facts, references, citations, sources or other information that is entirely false.

⁹ Which equates to approximately 10 A4 pages of typing using Times Roman size 12 font with double spacing.

¹⁰ Under [Practice Direction HC97](#) (as amended); exceptions are only permitted with leave of the court.

¹¹ See: (i) Practice Direction HC142; and (ii) 'Guidance on the use of AI tools to prepare material for submission to the WRC' [Online:] "[WRC Guidance](#)"

- AI generated content may incorrectly summarise genuine sources or misrepresent information.
 - Personal and other confidential data may be processed in ways that are unexpected or unknown to the user.
10. ComReg seeks to ensure that any use of AI related to submissions in the context of ComReg's dispute resolution process supports, rather than undermines, the integrity and effectiveness of that process and is providing its guidance to:
- assist parties in understanding the responsible and appropriate use of AI in the dispute resolution process;
 - help ensure information provided to ComReg is accurate, complete and verified under human control and supervision¹²;
 - promote transparency where AI has assisted in the preparation of submissions;
 - reduce the risk of misleading or inaccurate AI generated content being used in the dispute resolution process;
 - assist in the timely, efficient and fair provision of its dispute resolution services; and
 - explain the potential consequences where information generated with the assistance of AI is incomplete, misleading or otherwise inaccurate.
11. ComReg has taken account of the experience gained to date in interactions with users of our dispute resolution services and general developments relating to AI use in complaints and disputes in the preparation of the Guidance.¹³
12. Through its guidance ComReg has sought to strike an appropriate balance between facilitating the beneficial use of AI (which can be an effective accessibility tool that brings efficiencies) and mitigating against the associated risks. ComReg will continue to monitor and review the use of AI by Parties engaging in dispute resolution and may amend its guidance as it deems necessary.

¹² [Practice Direction HC142](#) states that where GenAI is used by a court user to produce content, it should be verified by a user through, amongst other things: (a) fact-checking and proofreading; (b) editing and adapting the content to meet the particular circumstances of the case; and (c) verifying references (such as to legislation, articles or case-law) and ensuring they stand for the propositions that are attributed to them.

¹³ The [EU Artificial Intelligence Act](#), an EU regulation designed to provide a high level of protection to people and promote the adoption of human-centric, trustworthy AI was issued in August 2024. There have also been several guidance documents and information notices (as referenced within this Guidance) issued from the courts, professional bodies and other agencies and entities that engage with lay litigants and complainants, regarding the use of AI.

2 Principles for AI use by End Users related to Dispute Resolution

2.1 Responsibility for content

13. AI tools can assist parties in preparing dispute resolution applications. However, AI can produce inaccurate, incomplete or misleading content and is known to present information confidently even where that information is incorrect¹⁴.
14. As ComReg relies on the information provided by parties when evaluating disputes, it is important that all submissions accurately reflect the facts, evidence and arguments that a party wishes to present, and that details are presented as clearly and succinctly as possible.
15. The use of AI does not transfer responsibility for the content of a submission from the individual or organisation submitting it. Guidance from courts, tribunals and professional bodies consistently emphasises that responsibility for written submissions remains with the relevant (AI using) party and is not reduced, removed or replaced by the use of AI. Parties remain responsible for the accuracy and completeness of any material submitted to ComReg whatever its form, and irrespective of who submits it on their behalf¹⁵, where AI is used in its preparation.
16. ComReg has observed instances where AI tools have been used to generate lengthy and sometimes irrelevant submissions in the context of its dispute resolution process that take significant time to consider, require extensive follow-up clarification (both of which have adverse effects on resources and the process in general), and often serve only to obscure the key points requiring resolution. Furthermore, it is inevitably the case that in considering submissions of this nature, the other party (or parties) to the dispute will likely face the same or similar challenges. This has the potential to undermine confidence in the dispute resolution process. Therefore, parties are required to use AI reasonably and responsibly. In particular and in this context, this includes avoiding the use of AI tools to make final submissions, or to generate a key dispute or complaint without human oversight and editing.

¹⁴ As noted by the Solicitors Regulation Authority (UK) 'Misuse of AI – Warning Notice' [Online:] "[SRA](#)"

¹⁵ This covers the parties, any representatives, any civilian or expert witnesses and any other party required to provide information of any kind in the course of the dispute resolution process and upon which a dispute party seeks to rely.

17. An individual representing themselves in a dispute is responsible for their submissions just as much as their representatives.¹⁶ Where parties are represented, professional standards and obligations will also continue to apply to those representatives (e.g. duties of honesty, competence and independence).
18. ComReg's guidance with respect to this matter is set out in '[Responsibility for content](#)' at [Annex 1](#).

2.2 Accuracy and completeness

19. While AI tools can assist in preparing submissions, AI tools can produce 'hallucinations' generating inaccurate, incomplete or fabricated content, omit relevant information, or produce responses and material that appear plausible but are false or misleading or misrepresent the facts of a dispute.¹⁷ Parties to disputes should not, even inadvertently, submit false or misleading information.¹⁸
20. ComReg relies on the information provided by parties to assess disputes fairly and efficiently. Information submitted to ComReg should therefore be accurate, complete, relevant and up to date. Submissions should not contain inaccurate, fabricated, invented, unverified or misleading statements, authorities or factual claims¹⁹.
21. Where inaccuracies, omissions or deficiencies are identified, the relevant content should be corrected before submission²⁰. While it may in some circumstances be appropriate to submit a number of documents or detailed information regarding a dispute, parties should avoid making excessively long and voluminous submissions which can cause process delays and detract from the effectiveness of the dispute resolution process as a whole.
22. ComReg's guidance with respect to these matters is set out in '[Accuracy and completeness](#)' at [Annex 1](#).

¹⁶ *Guerin -v- Doherty* [2026] IECA 48.

¹⁷ Practice Direction HC142

¹⁸ *Guerin -v- Doherty* [2026] IECA 48.

¹⁹ [Online:] [Updated guidance on AI use in workplace...](#) | Mason Hayes Curran

²⁰ See: *Von Geltz v Kelly* [2026] [Online:] [Judgments](#) | [The Courts Service of Ireland](#)

2.3 Verification

23. Content generated with the assistance of AI may not always be current, complete, accurate or relevant and should not be assumed to be reliable without appropriate review.²¹
24. Unreliable information, such as that produced due to an AI hallucination, can affect the assessment and handling of a case relating to a complaint or a dispute, may negatively affect the outcome of a case and may also lead to delays in its processing. It may even amount to an abuse of process.²²
25. To prevent this, verification of all information should be carried out by the submitting party. It follows, based upon the principles set out above, that the use of AI tools to verify AI generated content is insufficient²³.
26. ComReg's guidance with respect to this matter is set out in '[Verification](#)' at [Annex 1](#).

2.4 Disclosure

27. Parties should acknowledge the use of AI²⁴ and should consider informing ComReg where AI has been used to generate content, substantive or otherwise, included in an application, submission or supporting document.²⁵ Indeed, the use of AI in accordance with this guidance should enable the disclosure of its use to be viewed in a positive and responsible manner.
28. ComReg's guidance with respect to this matter is set out in '[Disclosure](#)' at [Annex 1](#).

²¹ Practice Direction HC142

²² *Fernando Oliveira -v- Ryanair DAC*, Workplace Relations Commission, ADJ-00055225.

²³ Practice Direction HC142

²⁴ Practice Direction HC142

²⁵ WRC Guidance

Annex 1: Guidance for use of AI in the context of submissions to ComReg regarding End User Dispute Resolution

1) Responsibility for content

- A 1.1 AI should be used as a support tool only and should not replace human judgment, review, or decision-making. Parties remain fully responsible for the accuracy and completeness of all submissions²⁶ they make to ComReg or that are made to ComReg on their behalf.
- A 1.2 The use of AI does not reduce, remove, or replace a party's responsibility for the accuracy, relevance, completeness and reliability of submissions. ComReg will treat all submissions as originating from and approved by the relying party, even where AI has been used to assist with drafting or preparation.
- A 1.3 Failure to take responsibility for content generated with AI assistance may affect the assessment and handling of a dispute. Inaccurate, incomplete, misleading, irrelevant or unreliable information may weaken a party's position, reduce the weight given to a submission, require clarification, correction or withdrawal of information and may result in delays to the dispute resolution process.

2) Accuracy and completeness

- A 1.4 Parties should ensure that factual statements, dates, figures, quotations, references and other information relied upon are accurate, complete, relevant and reliable, particularly if AI is used to assist in their compilation.
- A 1.5 Submissions should not be overly long or complex.
- A 1.6 Supporting evidence and documentation should be provided, where available, to establish the accuracy, completeness, relevance and reliability of information submitted. However, if ComReg receives a submission from a party that is overly long or complex, or it forms the view that a submission has been produced with the assistance of AI, ComReg may seek clarifications from the party regarding the submission and it may ask the party to resubmit it in a different form.

²⁶ In this guidance the term “submissions” covers any communication to ComReg by a party in the context of it carrying out its dispute resolution functions; it includes without limitation, application forms, supporting documents, submissions of fact or law, and correspondence.

3) Verification

- A 1.7 Parties should endeavour to verify any factual assertions, quotations, references, dates, figures, calculations and other information generated by AI; and verify the accuracy, completeness, relevance and reliability of any AI generated content before submitting it to ComReg.
- A 1.8 Information generated by AI should, where appropriate, be validated against known data, research or expertise. Parties should not use another AI tool, or the same AI tool, to verify AI-generated content.
- A 1.9 Failure to appropriately verify AI generated content may result in inaccurate or misleading information being submitted to ComReg. This may require clarification or correction, it may delay the dispute resolution process or affect the weight, reliability or credibility of a submission. In more serious cases, it could amount to an abuse of process. It is ultimately for the Decision Maker to determine whether such information will be accepted and if so, how it will be treated.

4) Disclosure

- A 1.10 Where AI has assisted in the preparation of a submission, parties should acknowledge the use of AI. They should be able to explain the nature and extent of the use of AI.
- A 1.11 ComReg may seek confirmation from parties regarding the accuracy, completeness, relevance and reliability of any submission(s) made to it, where ComReg is of a view the submission may have been produced with the assistance of AI.
- A 1.12 Parties are responsible for ensuring that information submitted to ComReg is accurate, complete, current and relevant to the dispute. Disclosure does not remove responsibility. Even where AI use is disclosed, the submitting party remains responsible for the accuracy, completeness, relevance and reliability of any submission(s) made.