



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Information Notice

Correspondence between ALTO and ComReg
concerning ComReg Decision D09/26 and
ComReg Information Notice 25/92

Information Notice

Reference: ComReg 26/55

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1. This Information Notice (ComReg Document 26/55) publishes correspondence between Alternative Operators in the Communications Market (**'ALTO'**) and the Commission for Communications Regulation (**'ComReg'**) concerning matters set out in ComReg Decision D09/26¹ (**'WDC Decision'**) and its relevance to the matters dealt with in ComReg Information Notice 25/92².
2. ComReg has decided to publish this correspondence (See Appendix 1) in the interests of transparency for all relevant stakeholders. Personal information such as individual email addresses has been redacted in the correspondence.

¹ Market Review, Wholesale Dedicated Capacity (WDC) Market, [ComReg Decision D09/26](#), 31 July 2026.

² Information Notice, Eircom's proposed adjustments to invoices for MI WHQA circuits regulated under ComReg Decision D03/20, [ComReg Document 25/92](#), 19 December, 2025.

Appendix 1: Correspondence



alternative operators in the communications market

Herbert House
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12 August 2026

Garrett Blaney
Chairperson
Commission for Communications Regulation (ComReg)
One Dockland Central
Guild Street
Dublin, D01 E4X0
By email: [REDACTED]

Dear Commissioners

Re. Decision D09/26 - Revised Connected Premises Location Data

We refer to ComReg Decision D09/26 on the Wholesale Dedicated Capacity ("WDC") market review.

This letter is submitted on behalf of ALTO and without prejudice to the rights and positions of individual members, including in any appeal, complaint, contractual dispute or regulatory dispute relating to Decision D09/26 or the matters addressed below.

ALTO seeks clarification on the regulatory status and operational implications of the revised Connected Premises ("CP") location data supplied by Eircom Limited ("Eircom") and used by ComReg in the Decision.

Information Notice 25/92 identified a concern that Eircom's systematic calculation of distances for billing appeared to change the approach previously applied. ALTO members understand the relevant operational changes to be associated with Project Alpha.

Information Notice 26/07 subsequently confirmed that issues concerning Eircom's CP location information were sufficiently material to delay the final WDC decision.

*Directors: Gemma Whiteley (Verizon), John O'Dwyer (eNet), Kieran Meskill
(Independent), & Ronan Lupton (Chair) Company Number: 305462*

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ComReg states at paragraphs 2.45 and 2.46 of Decision D09/26 that it received a revised dataset on 8 June 2026 and used it in the final analysis.

ComReg explains that the corrections to the H2 2024 data did not materially affect the geographic market outcome: 3% of workplace zones ("WPZs") changed classification, with a net movement of one WPZ from Zone A to Zone B. It also states that the geographic assessment methodology was unchanged, that the current data was sufficiently robust, and that re-consultation was not required.

Annex 15 provides additional detail on ComReg's general treatment of service-provider data, including a new building-polygon method for identifying duplicate CPs, the circulation in July 2025 of cleansed datasets to providers for verification, and ComReg's view that the revised treatment is more accurate than the approach used for the 2024 Consultation.

ALTO acknowledges those explanations. However, they principally address the suitability of the data for the geographic market analysis. They do not clearly resolve the separate question of the status of Eircom's location data and methodology for pricing, ordering, billing and contractual purposes.

It remains unclear whether ComReg's reliance on the revised data was confined to Decision D09/26 or whether ComReg considers that dataset, or Eircom's underlying location methodology, authoritative for wider regulatory purposes.

This distinction has practical consequences. CP location and distance calculations can affect the regulatory classification and price of circuits, customer quotations, invoice validation and rights arising under the Leased Line Reference Offer ("LLRO").

Access seekers routinely rely on Eircom's pricing, ordering and billing systems for those purposes. ALTO members continue to report discrepancies between revised location data supplied by Eircom and results generated through Eircom's pricing tool, as well as unresolved challenges to individual records.

Decision D09/26 maintains transparency requirements concerning operational processes, IT-system changes and billing information. In that context, clarity is required on whether the relevant systems and datasets are aligned and whether any material change to the applicable methodology was notified to access seekers.

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ALTO is also aware of existing disputes between Eircom and individual operators concerning the application of the LLRO to these matters. This letter does not invite ComReg to determine, or express a view on, any such dispute outside the applicable process.

It would nevertheless assist regulatory certainty and be most welcome, if ComReg confirmed the scope of the conclusions reached for the market review and whether those conclusions have any bearing on separate contractual or regulatory proceedings.

Clarifications requested

ALTO would welcome ComReg's response to the following questions:

- whether ComReg's reliance on Eircom's revised CP location data is limited to the geographic and SMP analysis in Decision D09/26, or whether ComReg regards the data or underlying location methodology as authoritative for other regulatory, pricing, billing or contractual purposes;
- the validation undertaken specifically in respect of the Eircom dataset received on 8 June 2026, including whether ComReg considered discrepancies or challenges submitted by access seekers and how any unresolved records were treated;
- whether the concerns identified in Information Notice 25/92 have been resolved and, if so, the basis for that conclusion, including the relationship between Eircom's systematic distance calculations, Project Alpha and the dataset used in Decision D09/26;
- whether ComReg is satisfied that Eircom's pricing, ordering and billing systems use location data and methodologies consistent with those relied upon in Decision D09/26, and whether access seekers may rely on those systems for quotations and invoice validation;
- whether any relevant changes to Eircom's location methodology or operational systems were notified to access seekers in accordance with the

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applicable transparency obligations under Decision D09/26 or the prior regulatory framework, and whether ComReg proposes any further supervisory or compliance action; and

- confirmation that ComReg's reliance on the revised dataset for Decision D09/26 is without prejudice to the merits of any existing or future complaint, dispute or appeal concerning the LLRO or the application of location data to individual circuits.

Given the ongoing operational and billing implications, ALTO would welcome a written response as soon as practicable and, where appropriate, publication of a short industry clarification so that all access seekers have access to the same information.

ALTO would be available to meet with ComReg to discuss these issues and to provide examples of the discrepancies reported by members.

Yours sincerely,



Ronan Lupton
Chair – ALTO

*Copy: Commissioners Mourik and Hodnett; Donal Leavy – Director Wholesale;
Colette Andrews and Leanne Biggs – ComReg Executive.*

**BY E-MAIL ONLY**

20 August 2026

Ronan Lupton
ALTO
Herbert House
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**Wholesale Dedicated Capacity (WDC) Market Review – ComReg
Decision D09/26**

Dear Ronan

Thank you for your letter of 12 August last concerning matters set out in ComReg Decision D09/26 ('**WDC Decision**') and its relevance to the matters dealt with in ComReg Information Notice 25/92. The Commissioners have asked me to respond on their behalf.

Insofar as the methodology, treatment and use by ComReg of the connected premises ('CP') information supplied by Eircom for the purpose of the WDC Decision are concerned, these matters are explained in the decision itself. The scope of the conclusions reached by ComReg with respect to the CP data used for the purposes of the WDC Decision are confined solely to that decision. The WDC Decision does not address the matter of the data used by Eircom for pricing, ordering, billing and other contractual purposes.

Noting the above, no conclusion may be drawn from the use of the CP data by ComReg for the purpose of the WDC Decision, for the purpose of any complaint or dispute concerned with the matters addressed in Information Notice 25/92.

Over the coming days, in the interests of transparency for all stakeholders, ComReg intends to publish an information notice which would include ALTO's letter and this response. In this respect, ComReg considers that the ALTO letter

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does not contain any confidential information and unless we hear from you by 24 August next, we will take this to be the case.

Yours sincerely

Bears no signature as sent by email

Donal Leavy
Director, Wholesale Division
Commission for Communications Regulation

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