



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Information Notice

Market Review

Wholesale Dedicated Capacity (WDC) Market

Delay in Publication of Final Decision

Information Notice

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1. This Information Notice provides an update on the Commission for Communications Regulation's ('ComReg') review of the wholesale dedicated capacity ('WDC') market in Ireland. WDC is the wholesale input for the provision of retail leased lines which are high quality, symmetric data connectivity services, typically used by medium to large enterprises for a range of ICT services.
2. The WDC market is currently regulated by ComReg's Decision D03/20¹ which was adopted by ComReg in January 2020 ('2020 Decision'). Eircom is required under that decision to provide wholesale leased line services to other operators ('Access Seekers') at regulated prices in certain geographic areas. Over the period 27 November 2024 to 31 January 2025, ComReg carried out a public consultation ('Consultation')² on its analysis of the WDC market, with this setting out proposals for the future regulation of the WDC market.
3. Having assessed responses to the Consultation, in October 2025, ComReg made its intended draft decision ('Draft Decision') accessible to the European Commission and other relevant parties (the 'Article 32 Notification') and published the Draft Decision by way of an information notice in ComReg Document 25/69³. By letter of 11 November 2025 ComReg received the EC's comments ('EC Response').⁴
4. ComReg had intended to adopt and publish the WDC decision in January 2026 having taken utmost account of the EC Response. However, in the meantime, ComReg became aware of potential issues concerning Eircom's wholesale leased lines data, in particular as regards the geographic location information (Eircodes or X Y coordinates) of the customer premises connected to a leased line ('Connected Premises' or 'CP(s)'). This arose as a result of a desktop-based data cleansing exercise by Eircom in advance of its migration to a new billing system, which led Eircom to communicate to its wholesale customers its intention to adjust amounts invoiced to them over the past twenty-four months for leased line services. ComReg issued an Information Notice on this in December 2025⁵.
5. As part of an ongoing separate data collection exercise, Eircom (and other operators) provides ComReg with a range of information in relation to leased lines pursuant to a statutory information requirement⁶ on a biannual basis ('Biannual Statutory Data

¹ Market Review - Wholesale High Quality Access at a Fixed Location, Response to 2018 Further Consultation and Decision, [ComReg Document 20/06](#), 24 January 2020 ('2020 Decision').

² Market Review - Wholesale Dedicated Capacity, Consultation and Draft Decision, [ComReg Document 24/92](#), 27 November 2024 ('Consultation').

³ Information Notice - Wholesale Dedicated Capacity, Notification to the EC of the WDC Draft Decision, [ComReg Document 25/69](#), 13 October 2025.

⁴ EC decision pursuant to Article 32(3) of Directive (EU) 2018/1972, [Case IE/2025/2605](#), 11 November 2025 ('EC Response').

⁵ 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.

⁶ Pursuant to Section 13D of the Communications Regulation Act 2002.

Collection'). This information supports a range of regulatory functions, including market analysis. Amongst the information gathered from Eircom is the actual geographic location (Eircode or X Y coordinates) of leased line CPs.

6. Given the above, ComReg has been engaging with Eircom extensively on this matter. While its desktop-based data cleansing exercise is ongoing, Eircom has confirmed that, in its view, an initial tranche of data ('Tranche 1') has resulted in revisions to geographic location information for a subset of circuits⁷. Eircom also informed ComReg that it expected to complete its desktop-based review of the data by the end of March.
7. The above revisions to geographic location information in the context of Eircom's invoice adjustment exercise also means that the corresponding information provided by Eircom under ComReg's Biannual Statutory Data Collection exercise is also incorrect, noting that such information has been used by ComReg in the WDC market review and the Draft Decision. The extent of inconsistencies within the Eircom data and the accuracy of the geographic location information provided by Eircom remain uncertain at this stage.
8. The accuracy of the geographic location information provided to ComReg is critical to ComReg's WDC market review as, for example, the geographic market definition and associated competition assessment for its analysis of WDC markets relies on the granular analysis of existing leased line CPs (as identified by the Eircode or X Y coordinates provided) and their proximity to operators' leased line networks.
9. Until such time as ComReg is satisfied with the quality of the leased line CP geographic location information provided by Eircom (and ComReg has an opportunity to assess any implications for its analysis of the WDC market), ComReg considers it prudent to postpone the adoption of a final decision on its WDC market review.
10. At this stage, ComReg is not in a position to give a definitive timeline for its final decision. ComReg will provide a further update on timelines and next steps in due course.

⁷ ComReg notes that Eircom has and intends to engage with Access Seekers with respect to Eircom's review of the accuracy of the geographic location information.