Network Incident Reporting Processes

Review and Subsequent Revision of ComReg Decision Instrument D08/24

Non-confidential submissions to Consultation 25/84

Submissions Received from Respondents

Document No:	[26/18]
Date:	10/03/2026

Consultation:	25/84

Content

ALTO

alto

alternative operators in the communications market

Consultation: Network Incident Reporting Processes - Review and Subsequent Revision of ComReg Decision Instrument D08/24 Consultation Ref: 25/84 & 25/91

Submission By ALTO

Date: January 16th 2026

ALTO is pleased to respond to the Consultation: Network Incident Reporting Processes - Review and Subsequent Revision of ComReg Decision Instrument D08/24 Consultation – Ref: 25/84 and extended by ComReg Ref: 25/91.

ALTO welcomes this opportunity to comment on this important consultation. It is obvious that with changes to the various weather systems impacting Ireland with more frequency, that the work and reporting processes under review and consistent with D08/24 make sense.

Preliminary Remarks

ALTO notes that the requirements set out in the Consultation appear largely aimed at incidents affecting mass-market providers, notably mobile providers that are most likely to be impacted by storm and weather conditions, yet the requirements applied uniformly across all provider types.

ALTO submits that this approach serves to potentially create disproportionate compliance burdens for smaller, and particularly B2B-focused providers.

ALTO submits that the chosen approach could also be counterproductive for the regulator, leading to an excessive volume of incident reports that are ultimately insignificant for customers.

Presently, and possibly purposefully the proposals cannot be said to be a one-size-fits-all approach. While that is fine on the basis of the undertakings most relied upon on the network, should the current processes be extended on an *ex-ante* basis, and perhaps even on a storm or incident event basis, then it is at least likely or probably that some, if not all small to medium sized operators on the market will have difficulty achieving compliance with ComReg's processes and reporting expectations. Such a position may be alright for now, but it is unsatisfactory in the medium to long term.

Other Remarks

ALTO makes some high-level remarks on the Consultation that are consistent with our preliminary remarks set out above.

Adoption of Municipal District ("MD") as Geographic Reference Unit
ALTO notes that major network incidents often require intensive, immediate focus on service restoration and root cause analysis.

ALTO submits that using MD as Geographic Reference Unit would require diverting critical engineering and operational resources to compile and verify extensive data points could, paradoxically, hinder the speed of recovery efforts.

Localised Significance Threshold
ALTO submits that the 50% customer threshold for mandatory incident reporting presents a challenge in areas with low customer density.
In such low customer density locations, a single outage could easily reach the threshold even if the absolute number of affected customers is relatively small. For example, B2B providers have low volumes of customers spread-out across the country, and therefore may have only one site in that MD. Under the current ComReg proposals, a single customer impacted would be a reportable incident which in ALTO's submissions seems to be entirely disproportionate (and may result in acknowledge false positives).

Proposal
ComReg should consider adjusting the reporting mechanism to incorporate a de minimis threshold to reduce burden on smaller providers. Specifically, an incident should only require mandatory reporting if it affects at least 50% of the provider's customer base within a single Metropolitan District (MD), and the provider has at least 100 customers in that MD.

In the alternative, ALTO submits that ComReg should require MD-level reporting only where providers have more than 1% of the national user base as per the current incident reporting requirements, and consider implementing a lighter, more proportionate reporting process for highly isolated incidents that are not "*a significant network failure*".

Adjustment of Storm Reporting Frequency and Deadline

ALTO supports the ComReg proposal to reduce the reporting frequency. Nevertheless, ALTO would prefer the report to be requested later in the day. This later timing preference is necessary to ensure the availability of all relevant internal stakeholders and to provide a more accurate representation of the situation, especially given that incident handling functions might be located in other countries. ComReg should note with interest that often Network Operations Centres or NOCs are both in-country and remote within the European Union depending on the kind of operator in question and the kind of technology under supervision.

Standardisation of Reporting with New Templates

ALTO submits that the proposed requirement for sharing granular information is far too complex. ALTO submits that the proposal lacks any clear justification regarding its proportionality and necessity. It is not demonstrated how this level of detail is strictly required to tackle operational bottlenecks at the MD level or improve coordination response.

ALTO members may make their own submissions on this Consultation, as is usual, however we are available to discuss the issues raised in this response should the need arise and in order to assist ComReg's deliberations on the subject.

ALTO

16th January 2026

Eir

Eir

eir's Response to ComReg Consultation:

Network Incident Reporting Processes

ComReg Documents: ComReg 25/84

16 January 2025

DOCUMENT CONTROL

Document name	eir response to ComReg 25/84
Document Owner	eir
Status	Non-Confidential

The comments submitted in response to this consultation document are those of **Eircom Limited (trading as 'eir' and 'open eir'), collectively referred to as 'eir Group' or 'eir'.**

eir comments

Introduction

1. eir welcomes the opportunity to provide comments on ComReg's proposals. Prior to the consultation ComReg engaged with network operators bilaterally and together through TII. eir is disappointed that eir's input during the pre-consultation engagement does not appear to have been properly considered as ComReg has provided no feedback on the points raised by eir and other interested parties.

2. It is important that storm reporting is designed to be implemented efficiently with minimal manual intervention so that efforts can be focussed on primary recovery activities. Unfortunately ComReg's proposals for the daily reports go beyond a reasonable level of detail and exceed the minimum necessary for DCCS and NECG to understand the extent of storm impact to communication services either directly or through loss of power. eir urges ComReg to streamline requirements as discussed further in this response.

3. It should be noted that eir is responding to this consultation from a network operator perspective, and not from the perspective of an RSP. That said, it is not clear from the consultation whether wholesale operators or RSPs would be required to report to ComReg under this Decision – clarification on this is needed. The draft templates blend information that is in some cases available to network operators and in other cases it is available to RSPs – the full suite of information required by the draft templates is not available to either wholesale operators or RSPs. Detail on this is provided below.

4. eir expects that reported data will continue to be treated as confidential and used solely to inform the Minister and DCCS.

Geographic Unit

5. eir notes the proposed introduction by this consultation of a new geographic unit of analysis for reporting purposes i.e. a Municipal District (MD) and we note the following stated in the RIA:

    In Ireland, 106 municipal districts were established in 2014 and are a sub-division of the county and act as a decision-making subdivision of the full Council that respond to extreme weather.'

6. Whilst eir has no principled objection to the use of MDs as the geographic unit it must be acknowledged that MDs do not align to network topologies which may lead to a degree of inaccuracy in reporting end user impact. eir's fixed network is organised into exchange areas which roll up to County level, which has been the basis of reporting for many years. In order to implement MDs eir will need to plot the physical location of network equipment within MDs and label them as such for the operation of reporting systems. This means it may be possible that some end users served by a network node in one MD may be located in an adjacent MD. eir's network monitoring and reporting systems are designed and operated on a top down basis, i.e. moving from core nodes (housed in exchange buildings) out to local access nodes (such as street cabinets). It is

not practical or indeed feasible for eir to redevelop its approach based on end user location, particularly when eir does not have precise location details for all end users. As such, it is conceivable that, under the proposed approach, open eir reports will reflect some end-users as residing in one MD (defined by the exchange associated with their address), when in fact their address is located in a neighbouring MD. The same is also true for mobile networks where a base station may be serving end users in more than one MD.

Additional Reporting Threshold

7. The consultation proposes that an additional reporting threshold be introduced for significant security incidents. A significant security incident is currently defined by reference to the proportion of the national user base impacted. These thresholds have served well ensuring that incident reporting has operated in an efficient manner. ComReg proposes that an additional incident reporting trigger be defined at more than **50% of a provider's users in the MD. ComReg offers no rationale for its proposal** and does not set out the impact of this, in quantified terms in the RIA. Nor does ComReg provide any evidence of past deficiencies in incident reporting where a security incident in a more localised area would have benefited from the triggering of incident reporting.

8. It is notable that ComReg did not consider a geographic area based reporting threshold when storm reporting was **aggregated at the County level. ComReg's** proposal is too granular and may be difficult for operators to implement when reporting systems for security incidents have been designed based on national thresholds.

9. This change could have a significant impact on reporting from a threshold perspective, which, as mentioned, we do not see assessed in the regulatory impact assessment. The number of reports to ComReg could rise imposing additional unnecessary burden on operators (even though no issue is described by ComReg that requires redress in this manner). This is very significant in terms of regulatory burden and we do not see what value this would add to what the priority should be, namely structured clear communication in the event of significant impacts to the network. **As such eir requests that ComReg does not implement the proposed additional reporting trigger threshold.**

Frequency of reporting

10. eir agrees with the proposal that reporting should be done on a daily basis. However eir has reservations with regard to the proposal to require reports to be delivered by 9am. The daily reports proposed by ComReg are very detailed. They will require compilation of data from a number of sources including from staff who work during standard office hours. The population of some of the fields, such as number of access issues, cannot be automated and will require manual intervention which takes time. eir requests that the deadline for daily report submission be set at 10am.

Draft Initial & Update Template

11. eir has reviewed the draft templates in Annex 2 and the definition of terms in annex 3 and has the following comments and observations. As noted above it is not practical or feasible for eir to align all end users precisely with MDs. As a general point, eir would expect to see a far more comprehensive data dictionary to have accompanied the draft templates. Sample completed templates would also help to ensure operators understand the requirements and respond consistently. Simplification is key in achieving this objective.

Fixed ECN

12. *Column F: Number of users with mitigations to minimise the impact of the incident.* It is not clear what is being contemplated in this context. open eir is aware that some retail providers deploy mobile based temporary solutions to end users without fixed broadband service. However this is not overseen by the fixed ECN provider and should not be included in this report. If ComReg has some other mitigations in mind within the gift of the ECN provider these should be clearly explained by way of examples and offered for further consultation.

13. As previously discussed with ComReg, the inclusion of both access and core faults may lead to some double counting in the figures.

14. Secondly and as also discussed, access network faults are only known to open eir, and therefore reportable, when a customer reports a fault via their retail service provider. It will typically be 48 hours after the weather event before open eir is in an informed position to report on storm related access faults distinctly from business as usual access faults.

15. Number of users impacted by a node outage: eir proposes that an additional column be added for the total of these users so the reports can be auto generated with column E, **'Total Service Users'**, being the sum of this new column and column G.

16. It is eir's interpretation that with the inclusion of column R, *Service*, there will be separate lines for fixed voice and fixed broadband services in each MD. Is this interpretation correct? It should be noted, as previously highlighted to ComReg during previous storms, that there may be some double counting of the end user impact where they are availing of both a PSTN voice and broadband service. Secondly, if this is the intention, eir proposes that the template should be clearly set out to allow for this i.e. operators should not need to add rows or change the structure of the template in order to complete the data required.

17. Column H 'Access Network: No. of CPE's (ONT, NTU etc.) affected'. open eir will need to undertake development to report on the number of CPEs impacted. The development will be for modern technology only, i.e. FTTH. No CPE reporting is being considered for legacy copper based services. The definition proposes that the reporting should not include those [ONT} lost due to a general loss of power to the premises. open eir does not have the capability to identify which ONTs have been lost due to a local power failure in the context of a storm event due to the sheer volume of alarms that will be

generated. It should also be noted that such reporting will include ONTs that have been powered down by the end user and will thus overstate storm impact.

18. **Column J 'Fixed Transport Network: No. of Nodes affected':** open eir requests that this column be removed as it is not necessary. open eir does not monitor the transport network in the manner contemplated in the draft templates. The transport network is built with redundancy so the loss of a node would not necessarily have an end user impact. To the extent that transport is lost the effect of this will be reported on for number of nodes and related end users isolated.

19. *Column L to P, Nodes/Exchanges at Risk and outage reasons:* ComReg proposes that ECN operators report on sites (and associated volumes of end users) that are at risk with sub-divisions between power, access, and other reasons. For the daily reporting to be efficient, and to not place a burden impeding recovery activities, it should be automated as much as possible. It could be possible to produce automated reporting for nodes that are on back-up power supply. However capturing access and other reasons will require manual intervention consuming resource and adding no value to the recovery operation. Columns L and M should solely relate to nodes / customers at risk of power loss. Columns N, O, and P should be removed. A more granular breakdown of outage reasons can be provided in the RCA. With regard to daily reporting, the notes field can be used to flag any particular location with access issues. However it should be noted that the TRRG has established an escalations mailbox which can be used to escalate matters where additional assistance from the ESB, Councils or other agencies, would be beneficial. Consequently it would be better for escalations / concerns to be managed separately to daily reporting.

20. Column Q – Average ETR for 95% of issues: It must be acknowledged that it will not be possible to provide ETRs with any precision in the immediate recovery phase following a storm event as a lot of the remediation will be dependent on power restoration.

Mobile ECN

21. **With regard to Column E 'Total Number of Service Users Affected (all faults) [as per agreed calculation methodology]'.** Firstly it is not clear where this methodology originated or who agreed to this. Secondly, eir notes , with regard to calculating the approximate number of mobile users affected by an incident, that the consultation proposes:

   a. *The number of users affected is calculated by measuring actual daily unique users per base station (averaged over a three month rolling period) and sum these figures for all impacted base stations during an outage, delivering a more realistic and reliable count of consumers affected.*

22. In advance of Storm Bram, December 2024, the MNOs agreed and advised ComReg of a common approach to estimating mobile user impact based on a snapshot of the volume of users per site in the busy hour. This informed reporting on the mobile user impact arising from Storm Bram. The snapshots would be taken quarterly to minimise the administrative burden on MNOs. Without any reasoned explanation ComReg proposes an alternative approach based on a rolling 3 month average of daily unique

users per base station. **ComReg's proposed approach will be burdensome to maintain** as it requires substantial daily data capture and analysis. The regulatory impact assessment does not set out what benefits are to be had from this approach relative to the one adopted by the MNOs and neither does it consider the additional cost burden **of ComReg's proposed approach. eir request**s that the estimation of mobile user impact be allowed to continue per the approach already agreed between the MNOs.

23. *Column F 'Number of users with mitigations to minimise the impact of the incident'*. As noted above, this is not something that is managed by the ECN operator. It is also unclear what mitigations could be contemplated as an alternative to a mobile service (in contrast to the loss of a fixed service where an active mobile service can provide an *alternative means of communication).*

24. *Column H 'Mobile Transport: No of nodes affected'*: As noted earlier in our comments on the fixed template, we do not believe it is necessary to amend reporting to include transport nodes. The impact of lost transmission will be captured in the number of impacted base stations and end users. eir therefore requests column H be removed to avoid unnecessary development work.

25. *Columns J-N*: Please see earlier comments regarding these proposed requirements in the fixed template. In summary eir believes it should be possible to report on nodes / end users at risk because the nodes are on back-up power (columns J and K). Columns L, M, and N should be deleted.

26. *Column O – ETR for 95% of issues:* Please see our earlier comments on the fixed template equivalent requirement.

27. *Column P 'Service'.* While the same point could be made for the Mobile ECN sheet as in the fixed section, in practice when mobile service is down this will impact both voice and data so differentiation is not required. Therefore the service column should be removed as it is unnecessary duplication.

ECS (Fixed Retail, MVNO, NIICS)

28. It is assumed that this template is only to be used by a retail provider or MVNO when they experience additional issues impacting their end users, over and above what is reported by the underlying ECN operator in the preceding fixed and mobile ECN templates.

29. Please see earlier comments on equivalent columns.

30. With regard to mitigations, retail providers will not be aware whether a customer experiencing a fixed outage has access to alternative services. It is assumed that this requirement relates to the deployment by some retail service providers of temporary mobile broadband devices in the event of an anticipated prolonged access outage for a fixed broadband service. From the eir Retail perspective this is a manual reactive process which does not lend itself to daily reporting. It may be possible to include such information in the RCA.

Draft Root Cause Analysis Template

31. It appears that the consultation only includes a root cause analysis template, to be provided within 30 calendar days, for weather related events, although the consultation document also refers to the requirements for a root cause analysis report for non-weather related security incidents. Clarification is needed on this, including a consultation period for this if it is to be applied to other security incidents.

Fixed ECN

32. *Column H 'Total number of users with mitigations to minimise impact of incident'*: As noted earlier in this response, this is not information in the possession of the ECN operator. It should be possible for ComReg to obtain this information from retail service providers to the extent they offer temporary alternatives.

Fixed ECN Premises

33. There is no explanation for this requirement in the consultation. eir assumes that ComReg is seeking to gather the location details of all premises impacted by a storm event. This appears to be an excessive requirement and ComReg has provided no information on what it needs this information for. ComReg must clarify its intention and offer further consultation on this proposal. It should be acknowledged that eir does not have a complete record of customer locations particularly in respect of those served by legacy copper services.

34. eir notes the template refers to lat/longs The consultation document refers to ITMs. A consistent approach is required and we consider the correct standard is ITM.

Mobile ECN

35. Please note our earlier comments regarding mitigations in the context of mobile services.

ECS (Fixed Retail MVNO NIICS)

36. As per earlier comments. It is assumed that this sheet is only to be used where a retail provider / MVNO encounters issues over and above those already recorded in the ECN sheets. Clarification is required on this point.

Affected Network Elements

37. The draft template is blank, however we believe that the information referenced in the table on page 20 of the consultation should be included. The column headers should be included accordingly. eir requests clarification as to what the requirements are in respect of **'Network Entity Identity' and 'Network Entity Name'** as a network node may only have 1 unique identifier.

Ending of reporting of a security incident

38. It has become ComReg's practice since storm Eowyn to maintain daily reporting until all related access faults have been cleared. This is not an efficient use of resources and a business as usual threshold should be maintained.

Implementation Timeline

39. The consultation proposes to allow three months from publication of the Decision Instrument to when the new requirements will become effective. In the context of system and operational changes that this will require, including the introduction of a new unit of geographic analysis **and to allow for 'at risk' category counting in the data, this is** insufficient. We are proposing a minimum of 6 months is needed based on an initial consideration of the effort involved including project dependencies. This is separate to the specific points made by eir in this response where we highlight that a further consultation period is needed.

Implementation Timeline

National Broadband Ireland (NBI)

National Broadband Ireland ("NBI") Non-Confidential Response to ComReg Consultation on Revision of ComReg Decision Instrument D08/24

16 January 2026

Introduction

NBI welcomes the opportunity to comment on the proposed revisions to ComReg Decision Instrument D08/24 (the "Consultation") and the new proposed templates for reporting of weather-related security incidents.

While NBI welcomes the clarity introduced by some of the proposed changes, it has significant concerns on other aspects of the suggested revisions, as set out in more detail below.

NBI Comments

A. *Proposed adoption of Municipal Districts/ MDs as the geographic reference area for <u>reporting</u> purposes*

NBI has serious concerns regarding the feasibility, accuracy, and overall utility of the proposed change to the use of Municipal Districts ("MDs") as the geographical basis for reporting security incidents to ComReg.

NBI records, monitors, and manages its network on a per-county and per-deployment area /OLT-area basis, reflecting how the infrastructure is physically designed, operated, and restored. The proposal to introduce an additional layer of MD-based assessment and reporting would require NBI to re-map its network data to a geographic framework which is in no way aligned with how the network is built or managed. This introduces significant additional complexity that NBI does not consider to be counterbalanced by any operational benefit or improvement in end-user experience.

NBI's OLTs are regionally based and serve defined deployment areas (DAs). In practice, these DAs may cross county boundaries and are not aligned in any way with MD boundaries. As a result, a single NBI OLT area or deployment area may span multiple MDs

(in some cases up to five). This misalignment gives rise to a fundamental reporting concern: a single network event affecting one OLT or DA could be required to be reported as multiple separate MD-based incidents, notwithstanding the common underlying cause, affected infrastructure, remediation activity, and restoration timeline.

In such circumstances, the same network event could be disaggregated into multiple MD-level incident reports, creating the appearance of several distinct incidents when, in reality, there is only one. This issue is exacerbated by the lack of clarity in the proposed reporting templates; for example the request in Column G of the Initial Incident and Updates template for figures on "*physical access paths affected*" in the relevant MD could result in one network break in one MD being reported in multiple MDs due to the knock-on consequences of this one incident, which only requires a single repair. This would result in a significant over-statement of the scale, frequency, and impact of the event, potentially distorting ComReg's understanding of network resilience, outage severity, and operator performance. It would also undermine the consistency and comparability of incident data over time and across operators, as the number of reported incidents would be driven by geographic boundary effects rather than by actual network failures.

To accommodate ComReg's proposal, NBI would need to translate its existing network maps and operational datasets into MD-based overlays and then assess impacted infrastructure and services at an MD level for each incident. This would require [*confidential*]. Initial internal estimates indicate that the cumulative cost [*confidential*].

In addition to system costs, there would be a significant operational burden on NBI's Operations teams, particularly during major storm events. Teams would be required to validate, reconcile, track, and report MD-level data in highly time-critical and resource-intensive conditions. This would [*confidential*].

NBI also notes that MD-based reporting would introduce a further layer of outage reporting that is inconsistent with the frameworks used by NBI when reporting to RSPs and to the Department of Culture, Communications and Sport. This divergence would increase the risk of [*confidential*].

It is not clear to NBI how ComReg intends to use MD-based reporting in a way that would deliver tangible benefits to end users. The primary rationale cited in the Consultation

appears to be to facilitate end users' understanding of connectivity availability within their MD. In NBI's view, county-based reporting would achieve the same objective in a clearer, more proportionate, and more comprehensible manner.

Furthermore, end users are typically concerned with the status of their own individual connectivity and are best served through direct and reliable communications from their retail service provider. Introducing MD-level regulatory reporting does not materially enhance this customer experience and risks duplicating or conflicting with existing, more effective information channels.

In summary, NBI does not consider that MD-based reporting would lead to quicker, more efficient, or better-targeted repairs for end users. Instead, it would introduce a high risk of duplicate incident reporting, over-statement of network impact, confused communications, and disproportionate operational effort, for a benefit that remains unclear and remote.

NBI also submits that the Regulatory Impact Assessment in the Consultation underestimates the operational and cost impact on operators and potentially overestimates the benefits to end users by not adequately accounting for existing, more effective mechanisms through which end users receive information on service availability and restoration.

NBI therefore has significant concerns regarding the proposal to introduce MD-based reporting and urges ComReg to reconsider this aspect of the Consultation.

B. *Proposed adoption of Municipal District ("MD") or island as a geographic reference area for* *triggering reporting*

NBI considers that the existing reporting triggers are fit for purpose. However, in the event that more granular geographic triggers are considered appropriate, NBI would favour a modification to the current reporting regime to introduce county-based triggers. NBI considers this to be a more proportionate and pragmatic approach to achieving enhanced geographic oversight of incidents.

A more granular geographic areas trigger (e.g., MD and/or island based) could lead to near constant reporting by NBI given our end-user numbers in some MDs and islands. In some cases, [*confidential]* user outages could trigger NBI's reporting obligations in specific MDs, and this would frequently be the case in respect of [*confidential]*. This does not offer meaningful data to ComReg and is unworkable for NBI from an operational perspective. It would trigger unnecessary reporting where minor events occur, wasting time and resourcing in both NBI and ComReg.

More granular triggers would also create a risk of fragmented and inconsistent reporting, as incident boundaries and affected areas can evolve rapidly during dynamic network events. Maintaining accuracy at a sub-county level would require frequent reassessment and reclassification of incidents as faults are identified, repaired, or re-scoped, further increasing administrative overhead and the potential for error. From a systems and process perspective, [*confidential.]*

By contrast, county-based triggers provide a clearer, more stable geographic framework that aligns with existing operational, planning, and stakeholder communication structures. County-level triggers would materially improve visibility for customers and senior stakeholders compared to national-level reporting, while avoiding the disproportionate operational effort and complexity associated with alternative reporting triggers which are based on more granular geographic segmentation. It would also reduce the likelihood of repeated or overlapping reports for closely related incidents, supporting clearer oversight and more consistent messaging.

In summary, NBI believes that in the event that a change to the current reporting triggers is required, county-based geographic triggers strike a more appropriate balance between the desire for improved incident visibility and the practical realities of operating and restoring a national access network during major events.

NBI considers that the method of application of any proposed more granular geographic threshold also requires further consideration because as devised it introduces significant disparity between operators. 50% of users for one operator in a specific geographic area could be a materially higher or lower number of end users than that arising from the application the same threshold to a different operator. NBI submits that thresholds should be devised based on the relevant geographic area (rather than the operators' user base in

that area) to avoid circumstances where one operator is reporting outages of a small number of users in one county, while another operator with significantly more outages in that area would not have to report.

C. Frequency of weather-related security incident reports

NBI supports the proposal to move to a single daily operator report in place of the current twice-daily reporting regime. However, NBI considers that a 0900 reporting deadline allows insufficient time for adequate validation and assurance of data prior to publication or release to ComReg. Overnight incidents, network events, and operational updates are frequently processed and confirmed between 0900 and 1000, meaning a 0900 submission risks being incomplete or subject to subsequent correction.

NBI therefore proposes a 1000 reporting deadline, which would enable more accurate and reliable reporting, supported by appropriate internal validation and review. This approach would improve data quality while maintaining timely and effective regulatory oversight.

D. Information required – new reporting templates

NBI notes the two draft replacement storm/weather related security incident reporting templates that have been published for comment. As a general observation, NBI considers that the underlying purpose and intended use of some of the requested reporting is unclear. In particular, it is not evident how the level of detail sought will materially enhance customer outcomes, inform decision-making, or drive meaningful operational improvement when weighed against the level of investment, system changes, and ongoing manual effort required to produce and maintain such reporting.

In NBI's view, the proposed reporting requirements are disproportionately granular and, in many cases, focus on parameters that are subjective, operationally ambiguous, and/or not actionable. As a result, the reporting risks becoming an administrative exercise rather than a tool that delivers clear value to ComReg, operators, end users or other stakeholders. This

imbalance between reporting effort and practical benefit is a recurring theme across the specific observations set out below on the Initial and Update Reports Template and/or the Root Cause Analysis/RCA Template as applicable.

- **Geographic granularity**:

    NBI's comments on the MD geographic area basis for reporting are provided in section A above. In summary, NBI considers the proposed level of geographic granularity to be excessive and to drive a cascading increase in reporting complexity across subsequent columns. This level of detail is overly burdensome to produce and maintain, particularly during storm events, and is not justified by any demonstrable operational or end-user benefit. It is also likely to be misleading by leading to duplicative reporting across MDs. From a senior stakeholder perspective, such granularity is unlikely to support clearer decision-making or prioritisation and may instead obscure key insights.

- **CPE versus ONT classification**

    NBI suggests that Customer Premises Equipment (CPE) should be captured in a separate column from the Optical Network Terminal (ONT). Responsibility for CPE rests with the Retail Service Provider (RSP), whereas the ONT is installed and managed by NBI, and NBI has direct visibility of its operational status following storm events. Combining these elements in a single reporting line risks double counting and creates ambiguity around ownership, accountability, and remediation responsibility, reducing the accuracy and usefulness of the reporting.

- **Users with mitigations**

    NBI does not consider the "number of users with mitigations" to be a relevant or appropriate reporting parameter. [*confidential.*]

[*confidential*]. This is irrational and would add significant monitoring overhead without delivering commensurate insight or value. NBI accordingly requests that ComReg remove this requested field in light of the operational realities (i.e., that service has been restored and the outage is over) and absence of any end-user impacts.

- **Repair estimates**

NBI submits that the repair estimate columns should be excluded from the reporting templates. Where restoration is dependent on [*confidential*], NBI is often not in a position to provide reliable or definitive repair timelines. In such circumstances, NBI would frequently be required to populate these fields with "*not available*," which would reduce the overall credibility and usefulness of the reporting.

More importantly, the inclusion of repair estimates at a geographic area level carries a material risk of setting incorrect or misleading expectations for end users. Where multiple faults exist within a given area, repair times can vary significantly depending on the nature of the damage, accessibility, safety considerations, third-party dependencies, and resource availability. A single estimated repair timeframe for the entire area would inevitably reflect the longest or most complex restoration activity, even though many individual faults may be resolved considerably sooner. For end users, this could lead to unnecessary frustration and loss of confidence, as customers whose service is restored earlier than the stated estimate may have been led to believe that a much longer outage was unavoidable.

[*confidential.*]

In addition, the dynamic nature of storm response means that repair priorities and sequencing can change rapidly as new damage is identified or access constraints evolve. Estimates may quickly become outdated, further increasing the risk of misinformation.

In summary, NBI considers that the inclusion of repair estimate columns introduces a high risk of misunderstanding and misaligned expectations, without delivering commensurate value. Excluding these fields would avoid the provision of incomplete information and support clearer, more accurate communications, while allowing NBI and RSPs to continue to provide targeted, connection-specific updates to end users through established and more appropriate channels.

- **"At risk"**

NBI submits that "at risk" (Column L) could be open to differing interpretations between operators. NBI requests that ComReg provides more detailed guidance on what constitutes "at risk" if this is included as a reporting parameter.

- **Eircode-level reporting**

In respect of the Root Cause Analysis template ("*Fixed ECN Premises*" tab), NBI considers that reporting to Eircode level is too granular given the numbers of premises potentially impacted by major events. To deliver this level of granularity in reporting, [*confidential*] would be required by NBI without providing any appreciable gain in service assurance/performance or network availability. Along with some other elements of the templates flagged in this response, this risks serving as a distraction from the primary focus - service restoration following a significant network impacting event.

In summary, NBI considers that the requested reporting, in its current form, lacks a clear and proportionate purpose. The operational effort, system dependency, and manual intervention required to deliver this level of detail would be significant, particularly during major incidents, yet the resulting outputs would offer limited incremental value in terms of end user experience, strategic oversight, or operational improvement. NBI therefore recommends that the reporting requirements be reconsidered and streamlined, with a focus on objective, actionable, and outcome-driven metrics that better align with stakeholder needs and operational realities.

E. Number of Mobile [and Fixed] users affected

NBI notes the proposals in the Consultation on numbers of mobile users affected, and considers that accuracy and consistency in reporting and in onward publication of numbers of users affected is essential to avoid misunderstandings. This is also an issue for fixed networks. NBI requests that ComReg ensures that all fixed operators are reporting on the same basis, noting that in the past some confusion has arisen where some operators [*confidential*].

F. Ending of reporting of a security incident

NBI notes that in respect of security incidents due to weather events, ComReg is proposing that rather than allowing an operator to assess whether it had returned to Business as Usual/BAU, it would instead instruct the operator as to when reporting of a security incident will stop.

NBI requests that to ensure proportionality, the declaration of the end of reporting must take account of what operators consider to be a return to BAU, and the factual matrix, under which the RSP has the direct contact with the end user. NBI is generally [*confidential*]. In this context, NBI considers that daily reporting by the network operator to ComReg until the final end user's service is restored may not be a proportionate approach.

G. Interim Root Cause Analysis / RCA

NBI notes the ComReg proposal that, in the case of storm or other weather-related security incidents, an initial RCA would be provided to ComReg 30 calendar days after the event, but this would serve as an interim RCA in cases where full recovery is not yet achieved due to the severity of the security incident. NBI understands that a final RCA would be submitted to ComReg at a later date. NBI has no issue with this proposal but requests that clarity on the relevant dates for reporting be provided at the time(s), whether via the portal or otherwise.

Conclusion

In summary, while NBI supports the overarching objectives of the Consultation, it has serious reservations about several aspects of the proposed changes as summarised below.

- The move to adopt Municipal Districts (MDs) as the geographic basis for incident reporting poses significant risks and challenges. It would be unduly costly and operationally burdensome to implement, lead to operational inefficiencies, and give rise to confused and misleading reporting which overstates the perceived impact of incidents. It is also unlikely to deliver any incremental benefits to end users compared with county-based reporting.

- Applying reporting trigger thresholds that apply to small geographic areas such as MDs or islands would lead to far too frequent reporting in the case of NBI, which would not be meaningful to ComReg or helpful to end users. Furthermore, a percentage threshold that applies to the specific operator's user base in the relevant area would result in unequal and unfair outcomes between operators, as the same percentage can represent vastly different numbers of affected end users depending on operator scale and footprint. This undermines consistency and proportionality in incident reporting.

- NBI considers several proposed data fields in the draft reporting templates to be unclear, subjective, or not useful. These include: MD-level and Eircode level reporting (which are far too granular); requests for numbers of users with mitigations (which is not meaningful); and repair estimates (which are liable to be misleading when available). These fields could cause inconsistent interpretations, misleading results, and unmet expectations, without providing practical or useful insights.

- NBI requests that greater consideration be given to aligning the end of reporting criteria with when a provider genuinely returns to BAU following an incident to ensure proportionality in implementation.

- NBI welcomes proposed simplifications such as submitting a single daily report rather than twice a day.

- NBI reiterates the importance of consistent reporting standards across all fixed and mobile operators to avoid misunderstandings.

- Finally, NBI highlights the need for enhancements to ComReg's portal to facilitate efficient data uploads, particularly in the context of the expanded reporting requirements. We would also request the ability to view and download historic reports (e.g., for Storm Éowyn, Storm Darragh etc.) and that this facility be made available for all reports going forward.

NBI appreciates the opportunity to contribute to this Consultation and requests that ComReg reviews and engages further with industry before moving to final Decision in light of the serious concerns outlined in this response.

SIRO

SIRO

The Herbert Building,
The Park, Carrickmines,
Dublin 18
info@SIRO.ie
www.SIRO.ie

Suzanne O'Toole
marketframeworkconsult@comreg.ie
Commission for Communications Regulation,
One Dockland Central,
Guild Street,
Dublin,
D01 E4X0.

14th January 2026   BY EMAIL

SIRO Response to ComReg Consultation on the Review and Subsequent Revision of ComReg Decision Instrument D08/24

Executive summary (SIRO position)

SIRO supports ComReg's objectives to improve national coordination and situational awareness during major storms and severe weather events, and we recognise the learnings from Storm Éowyn that underpin this review.

However, as drafted, Option 2 risks becoming operationally unworkable for wholesale and fixed-network operators unless ComReg makes targeted changes, notably:

1. Municipal District (MD) reporting: SIRO cannot reliably report incident impacts by MD because our network topology, asset hierarchy, and GIS/OSS design are not aligned to administrative boundaries; forcing this mapping at premises level would be uneconomic and may reduce accuracy rather than improve it. ComReg's view that MD reporting is unlikely to create significant costs does not reflect the realities of network design and operational triage.
2. ">50% of users in an MD/island" trigger: The trigger is ambiguous and can lead to disproportionate reporting obligations in small MDs (e.g., 4 of 8 affected). It needs an absolute floor and clear definitions for wholesale providers.
3. Templates and expanded data fields: SIRO supports standardised templates in principle, but many fields are not captured in our systems in the required format, and some (e.g., Eircode-level premise listing) are disproportionate and may introduce data-quality and confidentiality risks.
4. Reporting cessation "until ComReg is satisfied": This should be tied to objective, pre-agreed thresholds rather than open-ended discretion, while preserving ComReg's ability to request further information under s.11(3)(g).
5. Interim RCA within 30 days: SIRO already performs RCAs internally and can share appropriate outputs, but the additional ComReg-specific interim reporting should be strictly proportionate and aligned with practical restoration realities.

Key request: ComReg should (i) publish precise definitions and calculation methodologies for all fields, (ii) provide a worked example, and (iii) hold a short technical workshop to finalise feasible and comparable reporting.

Context: SIRO network model and incident operations (why MD/premise reporting is problematic)

SIRO is a wholesale-only FTTH network operator. Our operational "unit of work" during outages is the network asset chain (Point of Interconnect → Point of Presence → feeder/distribution → ODPs), not administrative boundaries.

During storms, the location and customer impact of faults is often initially inferred from alarms and only confirmed after field investigation—frequently after the storm has passed. SIRO therefore:

- correlates alarms to common fibre assets,
- derives impacted access identifiers,
- issues a Master Fault to retailers, and
- pushes automated updates through systems aligned to our Incident Management Plan.

Retailers then decide whether/how to communicate those updates onward to end-users (SMS, agent scripts, or other). This operational reality matters because the consultation assumes a level of remote certainty (fault location + impacted customers + administrative geography) that is not consistently achievable in real time.

In this overall context, we wish to highlight a practical limitation in fault localisation during live incidents. While our monitoring systems can generate alarms indicating loss of service affecting specific end users or network elements, determining the precise physical location of the underlying fault along the relevant route (and therefore the definitive set of impacted customers) can be complex in real time and, in some cases, may lead troubleshooting teams to an initially incorrect likely location.

By way of example, a damaged or severed cable may carry multiple layers and services (e.g. interconnect links, metro, feeder and distribution fibres). Even where the asset is accurately modelled as deployed in the field, the observed impact can be ambiguous during the active fault window. Apparent "fibre break" symptoms may, for instance, be driven by faults or breaks on retailer networks and present upstream as an outside plant issue until field verification is completed. Accordingly, correlating a single "master fault" to the exact physical location and the complete list of impacted customers is not an exact science while the incident remains ongoing; the picture typically becomes clear only once crews have located, verified, and resolved the issue on site.

In this context, we are concerned that the proposed reporting approach could imply that an operator has inaccurately communicated incident location or customer impact, where any variance is simply a function of the information reasonably available within the interval between alarms manifesting and on-site confirmation. We consider further engagement with network operators necessary to ensure the reporting framework appropriately recognises these operational realities—particularly for high-volume, complex faults on mature, efficiently deployed networks—and avoids creating an expectation of real-time certainty that cannot be consistently achieved in practice.

Detailed comments on Option 2 (the "eight measures")

I. Geographic unit for reporting: Municipal District (MD)

ComReg proposes MDs as the geographic reference area for reporting (including storms). ComReg further considers the incremental cost impact unlikely to be significant.
SIRO position: We do not object to ComReg (and State agencies) *using* MDs operationally, but SIRO cannot be made responsible for converting network events into MD impacts at the level implied by the templates.

Why this is not feasible/accurate for SIRO

- *Topology mismatch:* Fibre serving areas do not follow MD boundaries; ODPs and feeder/distribution segments can span MDs, and the "fault location" can be upstream of the impacted premises.
- *Data-model mismatch:* Our GIS is built to support provisioning and restoration (accurate asset location), not to attribute every premise to an MD "tile".
- *Incident uncertainty:* Early reporting is necessarily "best estimate"; demanding granular geographic certainty creates a conflict between timeliness and accuracy (a point already raised by industry).

Recommended modification (practical alternative)

1. Allow county-level reporting as the default during active storm restoration, with optional "sub-county" detail where reliable.
2. For additional granularity, permit reporting based on network-meaningful units (e.g., PoP area / ODP clusters / outage polygons) and allow ComReg to translate these to MDs centrally.
3. Where MD reporting is retained, mandate it only for validated post-incident analysis (RCA stage), not as a strict requirement for daily operational updates.

II. Definition of "significant incident": >50% of provider's users in an MD/island

ComReg proposes an additional trigger: where >50% of a provider's users in an MD or island are affected.

SIRO position: The objective (capturing severe localised impacts not visible in national thresholds) is reasonable, but the trigger is too ambiguous and risks disproportionate reporting for small MD user-bases.

Specific issues:

- It can be read as requiring ComReg portal reporting for small-n impacts (e.g., 4 of 8 users), which is not proportionate.
- For a wholesale operator, "users" must be clearly defined (end users vs wholesale customers vs access paths).

Recommended   modification   (clear   and   proportionate   trigger)
Adopt a dual threshold:

- Relative threshold: >50% of users in the MD/island ***AND***
- Absolute floor: at least X affected users (e.g., 500 or 1,000), or "user hours" above a fixed minimum.

For SIRO operational alignment: SIRO typically appoints an Incident Manager once impact exceeds ~1,000 affected customers/access paths. We recommend ComReg adopt a floor aligned to meaningful incident command activation to avoid trivial-trigger reporting.

<u>III. Root-cause categorisation (five categories)</u>

ComReg proposes aligning categorisation to ENISA-style subcategories: human error, system failure, natural phenomena, malicious actions, third-party failures.

SIRO position: Support in principle, but ComReg must clarify terminology: the consultation repeatedly uses "security incident" in a way that reads like it is intended to capture *all operational outages* (including storms).

Key request:

- Provide an explicit definition of "security incident" as used in this instrument, and how it maps to (i) availability/outage reporting and (ii) other incident reporting regimes, to avoid duplication and confusion.
- Publish standardised definitions/methodologies for all fields so reporting is consistent and comparable across providers.

<u>IV. Reporting cadence: one daily update at 09:00</u>

ComReg proposes moving from twice daily (10:00 / 16:00) to a single daily submission at 09:00 for weather events.

SIRO position: Noted and broadly supported, as it reduces operational burden during live restoration. This aligns with industry's preference for a more proportionate cadence. We recommend ComReg also allow limited flexibility for exceptional circumstances (e.g., connectivity constraints, major restoration surges).

<u>V. Additional information via two new templates uploaded to the portal</u>

ComReg proposes two templates: (a) daily updates and (b) RCA, submitted via file upload.
SIRO position: Standardisation is welcome, but the templates must be redesigned so they are (i) feasible for wholesale/fixed providers, (ii) based on clear definitions, and (iii) proportionate.

Main concerns:

1. Fields not captured in SIRO systems as currently defined (e.g., "nodes deployed per municipal district", certain "at risk"/mitigation constructs, premise-level geo-fields).
2. Premises/Eircode-level RCA requirement: ComReg's RIA suggests Eircode-level data enables deeper analysis and enrichment.
   - For SIRO, producing "all affected Eircodes" is not a reasonable by-product of restoration and would require additional system work and governance controls.
3. Accuracy vs timeliness: ComReg recognises emergency decision-makers may act on incomplete information and seeks clarity and avoidance of misinterpretation; however the templates risk compelling precision that cannot exist early in incidents.
4. Escalation/public reliance risk: ComReg notes incident information may be relied upon by the Minister and could appear in Dáil records; ComReg also references making incident information publicly available.
   This increases the need for: (i) clear "best-estimate" labelling, (ii) validation stages, and (iii) confidentiality/security controls.

Recommended modifications (template design):

- Make key fields optional/"unknown at this stage" for early daily updates, with a structured process to firm up numbers later.
- Replace MD-mandated fields with "geographic reference (county + optional sub-county)" and/or "network entity identity + coordinates", letting ComReg map to MDs centrally.
- For RCA: require asset-level location (nodes/poles/ODPs) as appropriate, but remove any blanket requirement to provide a complete Eircode list of impacted fixed connections unless ComReg can clearly demonstrate necessity, proportionality, and secure handling (and provides a realistic implementation timeframe).
- Publish precise definitions and calculation methodologies for every reporting field (affected users, at-risk, mitigations, infill coverage, time windows), and provide a worked example.

VI. Measurement of users affected: "actual daily unique users per base station"

ComReg proposes improved methodology for mobile user impact estimation using three-month rolling average "daily unique users per base station".

SIRO position: For SIRO (fixed wholesale FTTH), this is not applicable. We request that the final instrument:

- cleanly separates mobile-only methodologies from fixed network obligations; and
- clarifies how wholesale fixed providers should quantify "users affected" (e.g., impacted access paths / active access identifiers), consistent with the template definitions for fixed ECN.

VII. Ending reporting: continue until ComReg is satisfied and instructs cessation

ComReg proposes that weather-related incident reporting continues until ComReg instructs otherwise, considering geographic concentrations and related factors.

SIRO position: SIRO does not consider it appropriate for reporting cessation to be open-ended and solely at ComReg discretion where objective thresholds can be agreed in advance.

Recommended modification:

- Define objective cessation criteria, e.g.:
  - daily reporting ceases when impacted users fall below a defined threshold *and* no MD/island exceeds a defined concentration threshold;
  - thereafter, move to less frequent summary updates (e.g., every 48–72 hours) until full restoration.
- Preserve ComReg's right to request further information under s.11(3)(g) where warranted.

This approach achieves ComReg's consistency goals while avoiding unnecessary operational burden and uncertainty.

VIII. Interim RCA within 30 days where recovery is prolonged

ComReg proposes an interim RCA within 30 days where services are not fully restored by then.

SIRO position: SIRO already completes RCA activity internally and, where appropriate, shares findings with retailers. A ComReg-specific interim RCA should not become a parallel reporting workstream that diverts resources from restoration.

Recommended modification

- Permit interim RCA to be a high-level summary (root cause hypothesis, restoration blockers, and immediate mitigations), with final RCA delivered after closure.
- Confirm that interim RCA is not expected to include full validated geographic premise-level datasets (e.g., complete Eircode lists) while restoration remains ongoing.

4. Implementation timeframe

The draft decision indicates the new requirements would apply three months after making of the instrument.

SIRO position: Three months is insufficient for the system, data-model, governance, and automation changes implied—particularly if MD attribution and/or premise/Eircode-level RCA outputs remain.

Recommended approach

- Minimum 9–12 months lead time, with phased implementation:
    1. Phase 1: once-daily reporting + simplified template (county-level + best-estimate).
    2. Phase 2: standardised definitions + automation/API approach.
    3. Phase 3: enhanced RCA requirements (asset-level), subject to proportionality and secure handling.

5. Process recommendations (to finalise a workable and comparable regime)

Consistent with the attached the IBEC industry position, SIRO requests ComReg:

1. Publish precise definitions and calculation methodologies for every reporting field (including time windows and how to treat wholesale structures).
2. Provide a worked example of each template using realistic hypothetical data.
3. Hold a short technical workshop (c. 60 minutes) to align on feasibility, intent, and comparability.

6. Conclusion

SIRO supports ComReg's resilience and coordination objectives and is willing to engage constructively to improve storm incident reporting. However, Option 2 requires targeted changes to avoid mandating reporting constructs that do not map to real network operations, especially for wholesale fixed networks.

SIRO would welcome follow-up engagement with ComReg to progress the practical modifications proposed above.

Thank you for considering this response to consultation. Please do not hesitate to contact us for further discussion on this matter.

Yours sincerely

No signature as sent by email

Rory Ardagh

Head of Regulatory Affairs

For and on behalf of SIRO

Sky Ireland

Consultation on Network Incident Reporting Processes.

ComReg 25/84

16th January 2026

Introduction.

1. Sky Ireland Limited ("**Sky**") appreciates the opportunity to respond to ComReg's Consultation on Network Incident Reporting Processes.

2. While Sky welcomes ComReg's objective of improving data quality and its reporting platform and processes, we believe the revisions proposed in the draft Decision are unduly onerous and will create unnecessary complexity that will be counterproductive to ComReg's stated objective of reporting improvements.

3. While we agree with the alignment of reporting frameworks across industry and support ComReg's objectives of transparency and network resilience, we consider the proposed framework to be unworkable in its current form. This is primarily due to potentially unclear boundaries between wholesale and retail, inconsistent calculation methodologies and disproportionate reporting demands on operators.

4. The absence of standardised metrics, particularly for mobile networks, risks inaccurate reporting. We believe that this form of expanded real-time reporting requirement will divert key employees away from their network restoration roles at the very moment they are most needed.

5. We are also concerned that the revised templates do not represent certain prior feedback given during industry engagement after what was a very welcome pre-consultation engagement process.

6. At no time during Storm Éowyn did any part of Sky's own network fail and as a retail operator with multiple industry partners, we rely on these physical infrastructure networks to deliver consistent reporting on their services. We believe that the proposed revisions may well be so complex as to result in excessive data creation and that potentially double reporting of outages may occur.

Proposed Revisions.

7. We will respond to the Consultation in the same order as the proposed revisions to the Decision.

Geographic area.

8. The expansion of the granularity to the Municipal District ("MD") level causes an extensive increase in the nature of reporting for a retail operator such as Sky. We would have concerns as to the level of accuracy given the mapping and routing of networks across MD borders and the high level of aggregation that exists in the wholesale providers' products, which may result in misrepresentative results in singular MDs that don't reflect the true outages. Networks do not align with administrative boundaries and the MD requirement risks misattribution.

Additional reporting threshold for significant security incidents.

9. We would respectfully highlight that increasing one of the incident thresholds to 50% of a MD will result in extensive reporting for even minor outages across multiple operators. A more suitable alternative would be to adjust the threshold to occasions where 50% of any providers users at a county level would trigger a security incident report. Alternatively, ComReg could establish a standard de minimis level that must be met before MD level reporting is triggered. Otherwise reports will have to be filed for areas of the country that could potentially have small numbers of affected customers. This could also have an impact

on future fibre-roll planning as operators may be mindful of increased regulatory burden as a barrier to entry to a particular MD market.

Security incident category.

10. While the alignment of the reporting categorisation in the daily report with that of the Root Cause Analysis report would appear to be a practical and a useful change, this will result in excessive categorisation of incidents on a daily reporting template. Sky can only report on what information it receives from its wholesale partners and in the initial stages of a significant weather event, this level of granularity in daily reporting will result in increased risk of error or duplication.

Frequency of security incident reports related to weather events, such as storms.

11. While Sky welcomes the removal of the requirement for twice-daily reporting we would suggest that the morning report be furnished at 9.30am. If there is an incident with significant outages, we would expect staffing and travel to also be affected and accordingly this additional time would allow for data verification of the daily report by our relevant teams. As Sky coordinates data from five wholesale partners, additional time is required to validate submissions. Furthermore, the quality and consistency of this wholesale data is key to our ability to report accurately and at the outset of a weather event this may be varied.

Information Required.

12. Overall, the expansion of the reporting requirements is a cause for concern for Sky as we ███ ███ ████████████████████████. Having reviewed the template structure proposed it is a cause for concern that the granularity of data is excessive and we would question its usefulness. We submit that the additional effort and resource risks diverting focus from customer restoration.

Calculation methodology for estimating the number of mobile users affected.

13. As an MVNO, we will be relying on our MNO partner for the delivery to Sky of this particular metric on our customers. However, we would have concerns that the intended methodology of unique users per site per day might inflate figures, particularly in areas where high volumes of foot or road traffic may distort the results. The proposed metrics would be by their very nature just estimates given the way mobile users traverse across multiple masts.

Ending of reporting of a security incident.

14. Sky would also have concerns about not establishing a de-minimis level that would trigger the ending of reporting. Sky would challenge the assumption in ComReg's RIA that operators would still be reporting in a similarly extensive fashion internally at the later stages of a major incident when volumes have reduced. While Sky would be endeavouring to support our customers' return to service, for ComReg to require operators to continue to submit daily reports that may be related to very minor numbers of customers is an unnecessary burden with little benefit. Sky would suggest that ComReg consider alternative options to ensure that operators are not endlessly submitting outage reports that are not relevant nor proportionate. While the desire to control the flow of reporting may be a key goal for ComReg, without any baseline this will be a disproportionate requirement that outweighs the expected benefit. We would suggest that ComReg set a standardised floor at which operators can cease daily reporting.

Interim root cause analysis.

15. Sky would submit that on the occasion of an extreme weather event that operators should only be required to submit an RCA report when requested to do so by ComReg as in such event all parties would be very aware of the overarching cause of the outages as being weather related.

Conclusion.

16. Sky fully believes that the telecommunications sector plays a key role in supporting end-users during a weather crisis event and we remain committed to the ongoing increased resourcing of this area of our business and are mindful of the impact of climate change. Nevertheless, we are of the view that the requirements as outlined are extensive and will, if implemented in full, require significant operational resource, time and expense, together with significant technical implementation.

17. The revised Decision cannot be reasonably said to be an enhancement of the existing Decision, these revisions represent a material step-change in the existing process. The technical implementation and design roadmap of all operators is highly congested with significant regulatory reform already in flight. The expectation that operators could look to introduce automation of such reporting within a three-month window is also unrealistic. This proposed timeframe in the draft Decision will result in Sky having to complete daily reports in an entirely manual fashion for a period.

18. It is generally accepted that the principal loss of ECS services during the recent storms was as a direct result of trees falling and the resulting power failures. ComReg itself accepts in its RIA to this consultation that the root cause was high winds and that only six mobile masts were affected out of the thousands across the country. Sky would welcome greater focus on the ultimate causation of the large level of outages that occurred. We would also suggest that a review be carried out as to the introduction of a national MPRN to Eircode mapping structure, to allow telecoms operators to identify power outages at that level.

19. We would welcome the opportunity to discuss the proposals in more detail or to join further industry engagement meetings.

Vodafone
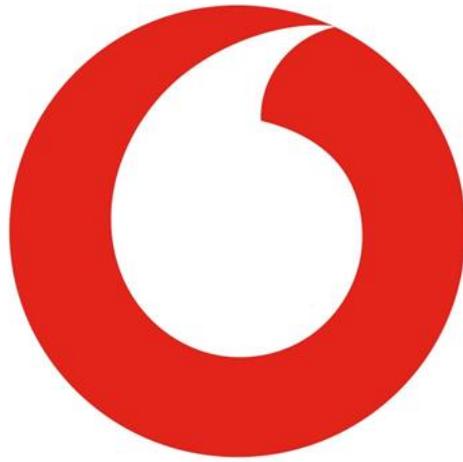
Vodafone Response to Consultation

Network Incident Reporting Processes –
Review and Subsequent Revision of ComReg Decision Instrument D08/24 Consultation

Reference: ComReg 25/84

Version: Confidential

Date: 16/01/26

Confidentiality

Vodafone requests that this entire submission be treated as fully confidential under ComReg's confidentiality guidelines. It contains commercially sensitive operational information and internal assessments that are not publicly available. Disclosure could prejudice Vodafone's commercial interests and operational security. Accordingly, this response is provided on a confidential basis and is not for publication.

Introduction

Vodafone welcomes the opportunity to respond to the Commission for Communications Regulation (ComReg)'s consultation on proposals to revise Decision D08/24. We share the objective of ensuring that incident reporting is timely, accurate and beneficial to emergency coordinators, and we understand our role in facilitating that.

We have invested in an automated process that

operationalises D08/24 efficiently and have been reporting effectively since its implementation.

██

Whilst we welcome proposals such as reducing the frequency of reporting, our principal concern is that the effectiveness of the revised regime depends on clear, quantitative definitions and clear processes, complemented with worked examples for every required field and method.

Without clear, quantitative definitions and well-specified processes, reporting will be inconsistent across providers and difficult to automate to the morning timetable. Moreover, without automation-ready definitions, the increased reporting metrics will place a significant burden on the incident reporting team.

Our response therefore focuses on requests for clarification that support standardisation and cross-industry alignment.

In this response, we set out where clarification is required for various reporting metrics and operational processes.

Definitions and worked examples

ComReg proposes new templates and a substantial increase in reporting metrics.

We ask ComReg to confirm clear, quantitative definitions and provide worked examples for the fields set out in the Annex 2 reporting templates, so that providers can produce consistent and comparable reports and automate daily updates.

Below, we highlight some of the challenges we have faced with the current definitions proposed to illustrate our case for further clarity and worked examples. However, we would like to note that this list is not exhaustive and suggest that ComReg individually review each of their definitions though a more specific and granular lens.

<u>"Total Number of Service Users"</u>

Vodafone asks ComReg to clarify how providers should count the total number of service users within a Municipal District (MD) for the Annex 2 templates.

The consultation introduces a new methodology for mobile services based on actual daily unique users per base station averaged over three months and summed across impacted sites. It also notes that where neighbouring base stations are lost there may be double counting of users who are regularly served by both sites. (3.6)

2

Whilst Vodafone notes that the proposed counting methodology is more accurate than the current proposal, we feel that clearer and more accurate definitions would enhance the data further and help to avoid misalignment in reporting across providers. (3.6)

To ensure consistency and comparability across providers, we ask ComReg to provide further clarity on what they mean by user and provide worked examples. Without the considerations below, there is a risk of inflated reporting figures.

Some factors to consider are:

- What constitutes a "user" for counting purposes in an MD (a device, a user, mobile or IoT/M2M SIM or device).
- Activity state – whether a user must be active on the network or whether an idle attachment also counts during the reporting window.
- Presence or attachment time – whether there is a minimum time in area or minimum attachment duration that must be met to count as a user for that MD.
- Duplication and deduplication – Acknowledgement of these issues with prescribed practice for providers.
- Attribution to MD for cell sites that span multiple MDs.

<u>"Affected"</u>

Vodafone asks ComReg to confirm what "Affected" means in Annex 2 templates, including whether it is limited to complete loss of service or also includes material degradation, and to state the quantitative thresholds, the minimum duration, the measurement window, and the counting method for each service. (3.5)

<u>"Mitigations"</u>

Vodafone notes that Annex 2 templates define mitigations as "the number of users who had partial or full service restored by workaround or alternative methods while awaiting repair of the affected service."

In its current form this definition is not practical. To ensure a standardised approach across providers and remove subjectivity, we ask ComReg to confirm a defined list of mitigation measures and to define "workaround" and "alternative methods," and to state whether counting is at user level, premises level or node level, together with the applicable time window and any minimum duration. Worked examples mapping these rules to the daily and RCA template fields would help ensure consistent reporting. (3.5)

<u>"At Risk"</u>

Vodafone notes that ComReg currently defines "At Risk" as "may be at risk of going off air if some other action is not taken." In its current form, this definition is subjective and not readily automatable. To ensure a standardised approach across providers and remove ambiguity, we ask ComReg to confirm a set of objective, measurable triggers, the measurement window and any minimum duration, and whether counting is at user level, premises level or node level. Worked examples mapping these rules to the daily template and the RCA template would help ensure consistent reporting and avoid inflation of figures. (3.5)

Operational considerations

<u>Reporting sites "At Risk"</u>

3

Confidential

We therefore ask ComReg to acknowledge this operational limitation and to accept "At Risk" information either:

- via the interim/final RCA when engineer assessment is required; or
- with an agreed lag in the daily template for this specific metric.

Vodafone will continue to supply all other daily fields and updates in line with the incident reporting framework.

<u>Reporting cadence and timing</u>

Vodafone welcomes the move from twice-daily to a single daily report for weather-related incidents. This reduces the burden on the incident team and supports efficient reporting during security incidents.

However, the proposed morning submission time is 09:00, rather than the existing 10:00 cadence. From an operational perspective, this is challenging: at 09:00 the incident team is still reconciling overnight events and coordinating plans. In addition, several template fields require manual input (for example, access constraints), which cannot be fully automated at that hour without diverting resources from restoration. A later timing requirement will ensure availability of all staff required to report.

To preserve reporting quality while supporting NECG's morning briefings, Vodafone proposes either a return to a 10:00 submission or an agreed submission window (for example, 09:30–10:00) to reflect the operational demands and challenges.

<u>RCA Operational Guidance</u>

We note that, under the proposed regime, ComReg would determine when reporting ends for a security incident. While this can aid consistency, it may create a long tail of open reporting faults where MDs are only partially resolved. In that context, it is important to consider the operational detail of interim RCA submissions. (3.7)

Vodafone notes ComReg's proposal to require an interim RCA within 30 days and a final RCA upon conclusion. (3.8)

To improve consistency where recovery is partial, Vodafone asks ComReg to consider issuing operational guidance for the RCA template in Annex 2 and, where appropriate, clarifying how the RCA should align with the daily template in the Annex 2 RCA template, specifically:

- Status visibility - whether and how the RCA should distinguish between sites restored and sites outstanding, and how geographic distribution, remedial actions, and outstanding blockers should be represented.
- Worked examples - whether ComReg can provide worked examples for mixed-status incidents (e.g., partial restoration) to illustrate the intended population of RCA fields and the transition from interim to final RCA.

[redacted]

Conclusion

Vodafone supports ComReg's aim of improving the usefulness of incident reporting to public authorities.

4

To enable accurate, comparable and automatable reporting across providers, we ask ComReg to: (i) confirm clear, quantitative definitions for each required field in the Annex 2 reporting templates, (ii) specify measurement windows, minimum durations and counting units (iii) provide worked examples for both templates, and (iv) acknowledge operational constraints for "At Risk" metrics and early-morning submissions.

We would welcome the opportunity to engage with ComReg and industry to refine the Annex 2 templates and accompanying guidance ahead of implementation, and we would be happy to meet with ComReg to support this work.

5

Three

Network Incident Reporting

Response to Document 25/84

9th January 2026

1. Introduction

Three is pleased to reply to ComReg's consultation, which aims to update and amend the process for reporting of network incidents. The informal consultation already carried out has been productive and has helped in developing proposals that work for both ComReg and operators/service providers. This is welcome, and we hope such further consultation will be used if needed to clarify any matters as needed arising out of this consultation. We are of the view that there remains some work to be done to develop a reporting process that works for operators and also provides ComReg the information it needs in a timely fashion.

2. Comments

Municipal Districts

We note the proposal to introduce reporting by Municipal District (MD) as the geographical reference for incident reporting. ComReg has explained the logic for choosing this reference, which is understood. We have a concern that this level of granularity might be too small in many cases, for example in the case of mobile networks following a storm. The coverage of sites does not map to the boundaries of the MDs and many sites will provide service to two or more MDs. This will introduce an error in the mapping of sites impacted to the relevant MDs.

Additionally, we note that many of the MDs cover a relatively small area and there might be no real benefit in breaking down the impact to this level granularity, e.g. MDs 5815001, 5815002, 5815003, all of which are within County Louth. Breaking down the data to this level may provide no real benefit but will create an increased burden on operators to provide their reports. ComReg should consider a higher level of granularity and we note that no particular deficiency has been identified with the current county level reporting.

In addition, ComReg should clarify the method used to determine which reference area a mobile site should be reported against. In cases where a site has coverage in more than one area, it would be misleading to report a loss of service in each one. Our recommendation is that the reporting should be against the area where the mobile site is physically located rather than the area where it might cover. This would seem to make practical sense for example if access to the site needed to be prioritised. ComReg might provide clarification on this.

Significant Security Incidents

ComReg proposes that for any single geographical area (MD or island), where more than 50% of any provider's users in that area are affected by the security incident, it would trigger a security incident report. It should be noted that it can be difficult during an incident to accurately determine the number of impacted users such that 50% of a MD or island could be identified. For the purposes of this requirement, ComReg should specifically acknowledge that this determination may need to be based on an estimate.

Frequency of Weather Related Reports

We note proposal to move to a single report per day, which is welcome. The time for provision of this report might have an impact on its accuracy in some cases. This would occur in cases where both field and office staff have completed work in the morning and would mean that a report delivered at 10:00 might have several differences to one delivered at 09:00. In addition, we would point out that a daily report is a single "snapshot" and that the actual status of a network might change significantly between one report and the next.

Determining the Number of Impacted Users

Several matters arise regarding the determination of the number of impacted users and we agree with ComReg that it is important to avoid providing a misleading representation of the impact of an incident (either over or under representing). In the case of mobile networks, there are varying degrees to which a user might be impacted, e.g. the loss of a single technology layer might have a minor impact on a large number of end users. It would be misleading to report this as an impact on all of those customers as it would significantly over-represent the impact. In addition, in the case of weather related incidents, where a mobile site has lost power, then power conservation measures can be used, e.g. taking down some carriers or a technology layer. This prolongs the availability of service, albeit there might be a reduction in speed or technology available. We are of the view that reporting should count sites where service has been lost completely and should exclude sites where service might be reduced in order to preserve overall availability. This kind of power management is carried out to benefit customers and it would be disincentivised if it was reported as loss of service.

ComReg has proposed a new approach to determine the number of impacted users, which is to measure actual daily unique users per base station (averaged over a three month rolling period) and sum these figures for all impacted base stations during an outage. This method would actually significantly over-estimate the number of impacted users because all sites will have many unique users per day (let alone per 3-months) on average and each user will be attributed to multiple sites. This number will be far greater than the instantaneous number of impacted users if that site is off air. It could lead to a situation where a network operator who has lost less than 100% of their sites is reporting a loss of service to more customers than 100% of their customer base.

This method would only be a reasonable estimate if the total number of customers on each network is divided out among sites in proportion to each site's average three-month customer load. The number of customers per network could come from ComReg's quarterly market data report.

The objective should be to attribute each end user to a site. Three recommends an alternative method to determine the number of impacted users as follows:

- The total number of mobile users on any network should be associated with the sites or cells on that network based on the latest CSO census population and the coverage of each site or cell. This associates the users with sites according to their home location, however we believe this is the most important location for most people during weather events like storms.

- To make this association, operators can use the latest Census data from the CSO, which provides the number of people per household. This data is then mapped to each site or cell on the network making sure each person is associated with only one site (the dominant one).

- The number of users impacted per site/cell is then determined according to the market share of all service providers (including MVNOs) on each network according to the latest published market share information published by ComReg.

In the case of an MVNO, we are of the view that it is better that their MNO reports on total users impacted by any incident impacting the radio access network (RAN) as this reduces the number of reports to be received by ComReg. For non-RAN incidents i.e. those that are caused by systems or networks within the MVNO's own control they should be reported by the MVNO directly. Equally, if a MNO experiences an incident that does not impact on their RAN then their MVNOs should be excluded from reporting.

The above proposed method provides an approximation of the number of users impacted rather than an exact number, however we believe it more accurate than the method proposed by ComReg.

Reporting Templates

We request that ComReg provide a completed example of each template. They need not use real data but should be realistic. This would greatly assist solving any ambiguities in completing them.

In relation to the initial and update template, we are of the view that ComReg has over-estimated the ability of operators to provide all of the proposed information during an incident and underestimated the burden in providing it. In some cases it is only the staff involved in managing the incident who could provide the information (if available at all) and this could delay the recovery. We are of the view that the following columns should be provided on a best-effort only:

- Number of users with mitigations to minimise the impact of the incident

- Number of Users at Risk

- Utility Power input cause (affected and at risk)

- Access cause (affected and at risk)

- Estimated time to repair (average ETR for 95% of issues)

Similarly, in the proposed RCA template, ComReg has proposed a very detailed analysis and breakdown of the incident by cause and by area. This would take significant time and resource to complete and we believe it would be disproportionate. It is not at all clear that this would be beneficial. ComReg should revise this template and provide a simpler less burdensome one. We suggest a single national RAC is more practical.

./

TII IBEC

Suzanne O'Toole
Commission for Communications Regulation
One Dockland Central
Guild Street, D1
16/01/2026
Via Email: marketframeworkconsult@comreg.ie

Reference: Submission re ComReg 25/84
Network Incident Reporting Processes – Review and Subsequent Revision of ComReg Decision
Instrument D08/24 Consultation

1. Introduction

Telecommunications Industry Ireland (TII), the Ibec industry representative body for the telecommunications sector in Ireland, welcomes the opportunity to respond to the ComReg Consultation 25/84. Industry remains fully committed to ComReg's stated objectives of improving transparency, coordination and resilience in the management of significant security incidents, including extreme weather events. Industry recognises the importance of structured information flows to support national and local emergency response mechanisms.

Industry also acknowledges that the consultation proposes certain improvements relative to the existing framework. In particular, ComReg proposes moving from twice-daily reporting (10:00 and 16:00) to a single daily report due by 09:00 during weather-related incidents. This reflects feedback previously provided by industry and represents a positive step towards reducing duplication during live incidents.

However, while this change is welcome, industry considers that it is not sufficient on its own to render the overall framework workable. The consultation simultaneously proposes a substantial expansion in reporting scope, increasing reporting requirements from approximately four core reporting areas to c.14 distinct categories. This materially increases the operational, technical and resource burden during incidents. As a result, even with reduced reporting cadence, the overall reporting load remains disproportionate and risks undermining network restoration priorities.

2. Critical Issues: Methodology and Operational Feasibility

2.1 Lack of Standardised Definitions and Calculation Methodologies

A core concern for industry remains the absence of precise definitions and standardised calculation methodologies underpinning the proposed reporting templates. This issue was raised clearly by industry during prior engagement with ComReg in summer 2025 and remains unresolved.

The proposed templates introduce a significantly expanded set of reporting fields without accompanying definitions or abstract calculation methods. Key concepts such as "affected users", "users at risk", "mitigations" and "infill coverage" are not defined in a manner that would ensure consistent interpretation across operators.

In the mobile context, industry has particular concerns regarding proposed metrics such as unique users per site per day. Without strict time windows, activity thresholds and clear attribution rules, these metrics represent shifting snapshots rather than stable indicators of impact. Given the dynamic nature of how mobile users interact with multiple sites, such metrics risk materially inflating reported impacts and producing misleading results. Industry has highlighted further concerns regarding potential duplication and inconsistency between retail MVNOs and MNOs in the absence of precise definitions and allocation rules.

Without standardised methodologies, operators will inevitably interpret reporting fields differently, resulting in inconsistent, non-comparable and potentially incorrect data, directly undermining the consultation's stated objectives.

2.2 Conflict Between Reporting Burden and Network Restoration During Live Incidents

Industry is concerned that the consultation does not adequately reconcile its expanded reporting ambitions with the operational realities of managing live incidents, particularly during extreme weather events. It is also unclear why this extra information is required and what its end use is.

While the move to once-daily reporting is welcome, the overall reporting burden has increased materially due to the expansion from c.4 to c.14 reporting areas. Completing detailed, granular reporting during live incidents places significant demands on operational staff at precisely the time when their priority must be restoring network services as quickly and safely as possible.

Industry repeatedly stresses that network restoration must remain the overriding objective during storms. Reporting obligations, while valuable for coordination and post-incident analysis, cannot detract from this primary purpose.

There is also concern that ongoing daily reporting until the last user is restored, combined with resource-intensive RCA requirements, remains overly onerous and of unclear regulatory value. Industry therefore reiterates the need for clearer end-points to reporting obligations and proportionate expectations regarding RCA depth and timing.

2.3 Reflection of Prior Industry Engagement

Industry notes that ComReg did engage with operators through a workshop process prior to this consultation, which is acknowledged as a welcome, positive and constructive step.

However, despite this engagement, the current consultation appears to reintroduce earlier template requirements, and add further fields, without explaining how industry feedback from that process was assessed, or why proposed reductions were not adopted. This creates a perception of scope creep and undermines confidence in the evidence base for the proposals.

Industry considers it important that ComReg both acknowledge prior engagement and clearly explain why industry input was not reflected, in order to maintain trust and support constructive collaboration going forward.

3. Secondary Concerns: Scope, Granularity and Data Integrity

3.1 Proportionality and Geographic Granularity

Industry has raised concerns regarding the increasing use of administrative geographic units for reporting purposes, including the shift from counties to LEAs and now municipal districts.

While industry recognises the intent to align reporting with emergency management structures, electronic communications networks are not designed, engineered or operated along administrative boundaries. Network coverage areas frequently span multiple administrative units, and individual sites routinely serve users across boundary lines.

As a result, increasing geographic granularity heightens the risk of misattribution, site crossover and double counting - particularly during dynamic incidents where network conditions and user behaviour change rapidly. Consequently, several members believe – as earlier referenced – that these geographic granular metrics would only represent shifting hourly snapshots of data, reducing the accuracy of daily reporting.

Industry also notes that successive changes in geographic reporting units have already driven repeated systems reconfiguration, process redesign and development costs for operators. The consultation does not demonstrate that these additional costs are proportionate to the operational or regulatory value of the more granular data now being proposed.

Further complexity is introduced through new geographic-based triggers, such as the proposal to classify a security incident as significant where more than 50% of a provider's users within a municipal district are affected. Industry is concerned that such thresholds add regulatory complexity without clear evidence that they materially improve situational awareness or response coordination. There is also concern that these triggers may have market-chilling effects, particularly for smaller operators, by increasing the likelihood of triggering significant incident obligations and potentially acting as a barrier to entry.

Taken together, industry considers that the consultation has not sufficiently justified the proportionality or regulatory necessity of municipal district-level reporting. In the absence of a clear demonstration that this level of geographic granularity materially enhances decision-making outcomes - relative to less granular approaches - industry recommends that ComReg reassess its proposed geographic reporting framework. Any such framework should better align with network topology and operational realities, while still supporting ComReg's resilience, coordination and transparency objectives.

3.2 Accuracy Versus Timeliness

Industry highlights a structural tension within the consultation between the desire for highly granular, accurate data and the expectation of rapid reporting during dynamic incidents. Early-stage incident data is necessarily best-estimate and subject to rapid change.

There is concern that such provisional data could be escalated to public representatives or public-facing channels without sufficient caveats, creating risk of misinterpretation. Industry therefore reiterates the need for ComReg to explicitly recognise the provisional nature of early reporting and distinguish it from validated post-incident data.

3.3 Data Model Risks and Double Counting

Industry continues to highlight ambiguity around ECS reporting, wholesale customers, mitigation fields and newly introduced concepts such as "infill coverage". These areas were not previously consulted on and create a material risk of double counting and inconsistency.

There is strong support for clarity in this area, as the regulatory burden and the risk of excess duplicate data collection are particularly acute where wholesale and retail services overlap.

4. Implementation Timeline

Industry notes that Part IV (Effective Date) of the draft Decision Instrument provides that "Decisions (1) to (8) above shall apply to providers as from the date of the making of this Decision Instrument plus three (3) months to allow providers to implement the new reporting templates within their organisation, processes and tools".

Given that the nature of the changes involves, amongst other matters, changes to internal business rules and technology, industry requests that a minimum of six (6) months is provided to implement the new reporting templates.

5. Clarification

In relation to the draft Decision Instrument, Decision 7 on page 58 of the consultation document includes the following text: "… and noting the any further details …" If this is a typo (apparent), can it be removed. If this is not a typo, please explain in greater detail what this requires.

6. Recommended Way Forward: Practical Solutions

Industry remains committed to constructive engagement and proposes the following practical steps:

- ComReg to complete worked examples of each proposed template using realistic (hypothetical) data.

- A time-limited technical workshop with operators to walk through definitions, methodologies and use cases.

- Adoption of a tiered reporting model distinguishing immediate operational updates during incidents from retrospective analytical reporting.

- Focus on key, critical, accurate data, ensuring all industry responses are standardised

These measures would materially improve clarity, proportionality and confidence in the reporting framework, while supporting ComReg's resilience objectives without undermining network restoration efforts.

Nicola Cooke
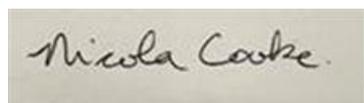
Director,
Telecommunications Industry Ireland