



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Notice of proposed Spectrum Transfer

Proposed transfer of spectrum rights in the 2.3 GHz Band from BCP IV Telecommunications OPCO Limited to Eircom Limited

Information Notice

Reference: ComReg 25/94

Date: 19/12/2025

Notice of proposed Transfer of spectrum rights of use

1. This document provides notice of a proposed spectrum transfer as detailed in Annex 1 and informs interested parties that submissions may be provided to ComReg on the proposed transfer by **Monday, 19 January 2026, 5:00 PM.**
2. In summary, the proposed transfer is for 40 MHz of spectrum rights in the 2.3 GHz Band from BCP IV Telecommunications OPCO Limited (formerly Imagine Communications Ireland Limited) to Eircom Limited.
3. ComReg will consider the proposed transfer, including all submissions received in accordance with ComReg's Spectrum Transfer and Lease Procedures and Guidelines (Document 25/46).

Background

4. The Commission for Communications Regulation's ("ComReg") framework for the Transfer or Lease of Individual Rights of Use for radio spectrum for electronic communications networks (ECN) and services (ECS) in Ireland is established in the Wireless Telegraphy (Transfer and Lease of individual rights of use for radio spectrum for the provision of electronic communications networks and services) Regulations 2024) (Statutory Instrument No. 99 of 2025) (the "Regulations").
5. The procedures and guidelines that ComReg typically expects to follow in facilitating and considering a proposed transfer or lease of Individual Rights of use are set out in ComReg Document 24/86 ("Procedures and Guidelines")¹.
6. Unless otherwise stated, defined terms have the meanings ascribed to them in the Regulations and the Procedures and Guidelines.

Proposed Transfer of spectrum rights in the 2.3 GHz Band from BCP IV Telecommunications OPCO Limited to Eircom Limited

7. On 12 December 2025, ComReg received a Notification of a proposed Transfer² of 2.3 GHz Band spectrum rights of use from BCP IV Telecommunications OPCO Limited's (formerly Imagine Communications Ireland Limited) ("BCP IV") to Eircom Limited ("Eir") (together the "2.3 GHz Band Notifying Parties") ("2.3 GHz Band

¹ See [ComReg's Spectrum Transfer and Lease Framework webpage](#)

² In accordance with Regulation 4 of the Regulations and Section 2.1.3 of Document 24/86.

Notification").

8. The proposed Transfer is for 40 MHz of spectrum rights of use in the 2.3 GHz Band as contained BCP IV's MBSA2 Liberalised Use Licence [LU1005](#) ("Proposed 2.3 GHz Band Transfer").
9. Relevant details of the Proposed 2.3 GHz Band Transfer as provided by the 2.3 GHz Band Notifying Parties is set out in Annex 1 below, where the information is provided in two parts:
 - Part 1: sets out general information relating to the Transferor, Transferee and a general description of the Proposed 2.3 GHz Band Transfer; and
 - Part 2: sets out relevant detailed information as provided by the 2.3 GHz Band Notifying Parties in support of the Proposed 2.3 GHz Band Transfer.
10. ComReg notes that the 2.3 GHz Band Notification does not require any amendments to the conditions of the MBSA2 Liberalised Use Licence.
11. As the 2.3 GHz Band Notification relates to spectrum rights of use issued under a MBSA2 liberalised Use licence (see Table 1 of the Document 24/86), ComReg will apply the Standard Procedure.
12. In this regard, and in accordance with Section 2.3.2 of the Procedures and Guidelines, ComReg welcomes submissions from interested parties on the Proposed 2.3 GHz Band Transfer by **Monday, 19 January 2026, 5:00 PM.**
13. Submissions must be provided in written form (e-mail) to marketframeworkconsult@comreg.ie, clearly marked – Submission to ComReg Document 25/94.
14. ComReg will consider the Proposed 2.3 GHz Band Transfer, including all submissions received in accordance with the Procedures and Guidelines.

Other Information - spectrum holdings in the mobile and wireless broadband licences

15. Information on the spectrum holdings of licensees in the mobile and wireless broadband licences is set out on the ComReg website³.
16. The information on this webpage has recently been updated to reflect BCP IV's notice of 12 December 2025 to ComReg, and ComReg's acceptance of same, that BCP IV has surrendered 15 MHz of 2.6 GHz Band TDD spectrum rights of use contained in

³ <https://www.comreg.ie/industry/radio-spectrum/licensing/search-licence-type/mobile-licences-3/>

its MBSA2 Liberalised Use Licence, specifically in the frequency range (2570 – 2585 MHz) with immediate effect.

Annex 1: 2.3 GHz Band Notification – BCP IV and Eir

Part 1 Information submitted for Transfer Notifications

Table 1: General information⁴ - Transferor/Lessor

No.	Transferor / Lessor details	Information provided
1a1	Legal name	BCP IV Telecommunications OPCO Limited (CRO 546906) (formerly known as Imagine Communications Ireland Limited)
1a2	Trading name	Not Applicable
1a3	Provider Name ⁵ (as listed on ComReg's Electronic Register of Authorised Undertakings (ERAU))	Not Applicable as the company is not providing or intending to provide an electronic communications network (ECN) or electronic communications service (ECS).
1a4	Business address ⁶	2nd Floor, 1-2 Victoria Buildings, Haddington Road, Dublin 4
1a5	Website	None
1a6	ComReg's eLicensing account number	[Redacted]
1a7	Contact person – name	[Redacted]
1a8	Contact person - telephone	[Redacted]

⁴ In light of GDPR, the relevant e-licensing account number, and the following details of the contact person: name, telephone and e-mail address – are not being published.

⁵ Undertakings need to hold a General Authorisation (unless exempt in accordance with [Document 03/90](#)) and the Provider Name (where required) needs to be the same as the Legal name provided. See ComReg website for further details on obtaining a [General Authorisation | Commission for Communications Regulation \(comreg.ie\)](#).

⁶ Complete postal address of registered office or, if it does not have a registered office, the principal place where it carries on business

1a9	Contact person – e-mail address	[Redacted]
1a10	Contact person – postal address	Brookfield Asset Management, One Canada Square, Level 25 Canary Wharf, London, E14 5AA

Table 2: General information - Transferee/Lessee

No.	Transferee / Lessee details	Information provided
1a11	Legal name	Eircom Limited
1a12	Provider Name ⁷ (as listed on ComReg's Electronic Register of Authorised Undertakings (ERAU))	Eircom Limited
1a13	Trading name	eir
1a14	Business address ⁸	2 Heuston South Quarter, St. John's Road, Dublin, D08Y42N
1a15	ComReg's eLicensing account number (if held)	[Redacted]
1a16	Website	eir.ie
1a17	Contact person – name	[Redacted]
1a18	Contact person - telephone	[Redacted]
1a19	Contact person – e-mail address	[Redacted]
1a20	Contact person – postal address	2 Heuston South Quarter, St. John's Road, Dublin, D08Y42N

⁷ Undertakings need to hold a General Authorisation (unless exempt in accordance with [Document 03/90](#)) and the Provider Name (where required) needs to be the same as the Legal name provided. See ComReg website for further details on obtaining a [General Authorisation | Commission for Communications Regulation \(comreg.ie\)](#).

⁸ Complete postal address of registered office or, if it does not have a registered office, the principal place where it carries on business

Table 3: Description of the proposed Transfer or Lease

No.	Description of proposed Transfer or Lease	Information provided
1b1	Is the spectrum rights of use being transferred or leased?	Transferred
1b2	Licence type being transferred or leased (e.g. Fixed radio link, Telemetry (National), MBSA2 Liberalised Use licence etc....)	MBSA2 Liberalised Use Licence
1b3	ComReg Licence reference number(s)	LU1005
1b4	Frequencies or frequency ranges to be transferred /leased (kHz, MHz, GHz) (please provide all relevant frequencies)	2360–2400 MHz
1b5	For an area-defined licence (e.g. a national licence or a licence not limited to specific sites/stations) what is the geographic extent of the proposed Transfer or Lease (For example, entire area covered by existing Licence, county or geographic contour, specific site only. For anything other than the “entire area covered by existing licence” please provide all relevant details)	National - entire area covered by existing Licence
1b6	Proposed effective start date of Transfer or Lease ⁹	14 February 2026
1b7	Proposed end date of Lease ¹⁰	

⁹ The effective date is subject to the Procedures necessary for ComReg to make a determination in relation to any notified Transfer or Lease. Notifying parties should aim to take into account the indicative time periods set out in the Procedures in providing this date. ComReg cannot provide any guarantee that the determination will be made by the proposed effective start date.

¹⁰ If a Transfer the expiry date on the licence will be the end date.

1b8	Intended use of the spectrum following the Transfer or Lease	To provide mobile network services
1b9	General description of the proposed Transfer or Lease (Additional information may be submitted alongside this Notification Form. For example, the proposed Transfer / Lease agreement between Notifying Parties)	The proposed transfer is the full acquisition of BCP IV Telecommunications OPCO Limited's MBSA2 Liberalised Use licence for spectrum in the 2.3GHz band by eir. eir will assume full responsibility for complying with the terms of the licence when the transfer is made.
1b10	Please provide information to demonstrate the ability of Transferee / Lessee (if appropriate) to meet any existing Licence Conditions	eir has extensive experience of operating mobile networks including in the 2.3GHz band and has, to date, met annual licence compliance assessments.
1b11	Details of the existing spectrum holdings (i.e. the quantum of spectrum held under all licences) of each Notifying Party in Ireland (including details that the parties' subsidiaries hold). (For example in the case of Fixed Links Party A has 10 Fixed link licences, each licence is for 2x50 MHz. Party B has 5 Fixed Link Licences, each is for 2 x 50 MHz. Party A's existing spectrum holdings for the licence type is 2 x 500 MHz or 1000MHz, Party B's existing spectrum holdings for the licence type is 2 x 250 MHz or 500 MHz) For licence types that are indicated to fall under the simplified procedure , please provide details of the existing spectrum holdings for	eir's mobile spectrum holdings are: 2x10 MHz in the 700MHz band 2x10 MHz in the 800MHz band 2x10 MHz in the 900MHz band 2x15 MHz in the 1800MHz band 2x20 MHz in the 2100MHz band 60 MHz in the 2300MHz band 80 MHz rural and 85 MHz urban in the 3600MHz band Transferor holds 3.6GHz - Rural: 60Mhz (3560-3620 MHz) spectrum issued under a 3.6 GHz Band Liberalised Use Licence 2.3 GHz TDD (40 MHz)(2360-2400 MHz) and 2.6 GHz TDD (15 MHz)(2570-2585 MHz) spectrum issued under an MBSA2 Liberalised Use Licence

<p>the licence type subject to the Transfer or Lease.</p> <p>At its discretion, ComReg may request that Notifying Parties submit all existing spectrum holdings.</p> <p>For licence types that are indicated to fall under the standard procedure, please provide details of all existing spectrum holdings.</p>	
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Part 2: Information that must be submitted for licence types that are to be considered in ComReg's Standard Procedure

The information provided by the Notifying Parties is contained in the text boxes below, redacted where appropriate.

Detailed information of each of the Notifying Parties:

- the jurisdiction in which it is incorporated and its respective geographical area of activity.
- a description of each Notifying Party, their business activities in the State, including their respective corporate groups (if relevant), in the proposed Transfer or Lease.
- the turnover of each of the Notifying Parties (including that of their respective corporate groups), both worldwide and in the State for the last financial year for which such information is available and for any available interim period in the current year.

Eir is a telecommunications provider in Ireland that offers quad-play bundles on an integrated network. Eir offers a range of retail and wholesale services on its fixed and mobile networks. Eir is the principal provider of fixed line telecommunications and the third largest mobile telecommunications provider in Ireland. Eir generates virtually all of its revenue in Ireland, where substantially all of the reported subscribers and customers are located. Eir is ultimately controlled by NJJ. Revenue for the year ended 31 December 2024 was €1,325 million.

BCP IV Telecommunications OPCO Limited (“BCP IV”) is incorporated in Ireland. Its’ sole geographic area of activity is within Ireland. It was formerly named Imagine Communications Ireland Limited. It operates solely for the business of holding its’ spectrum assets. It is part of the Brookfield related telecoms investment structure which divested control of Imagine Communications Group Limited in December 2024. Ultimately, BCP IV is controlled by Brookfield Asset Management, a NYSE listed Alternative Asset Management. BCP IV has no turnover.

Detailed description of proposed Transfer or Lease:

- description of the nature of the proposed Transfer or Lease.
- details of the commercial objectives sought to be achieved by the proposed Transfer or Lease (e.g., pre and post-Transfer/Lease capacity utilisation, strategic alternatives such as equipment upgrades or spectrum farming, network investment plans).
- any contractual arrangements made in relation to the Transfer or Lease - this can be in the form of a draft Transfer or Lease agreement between the parties;
- in the case of partial Transfers, a proposal for the division of spectrum usage fees in accordance with the relevant licensing regulations between the licence holder and the Transferee so that there is no net reduction in the spectrum usage fees payable to ComReg as a result of the Transfer. In the case of a Lease and noting whether the proposed fees would be provided for under the licensing regulations, the Lessor shall continue to remain responsible for paying the licence fees.

The nature of the proposed transfer is a complete transfer of 40MHz of 2.3GHz TDD spectrum band in the 2360 – 2400 frequency, part of Licence LU1005 from BCP IV to eir. Following a strategic review Imagine (as licensee of BCP IV of 3.6GHz Spectrum) has decided to retire its older wireless network. This is confirmed on Imagine's website <https://www.imagine.ie/about-us/> under the section "Where are we now". As such BCP IV has decided to make available its spectrum licences. Eir wishes to purchase BCP IV's MBSA2 2.3GHz holdings with full ownership of the licence and responsibility for complying with all the licensee's obligations being assumed by eir. Eir intends to combine the transferred spectrum with its existing 2.3 GHz spectrum to support the provision of higher capacity mobile data services enhancing the competitive attractiveness of its services and to support the growth of eir's retail and wholesale customer bases. Eir notes that if the transfer does not proceed the spectrum will not be utilised which is not an efficient use of the spectrum that was recently made available to the market through MBSA2 process.

[redacted]

The parties propose for the division of spectrum usage fees in accordance with the relevant licensing regulations as set out in Schedule 5 of the MBSA2 regulations (S.I. 264 of 2011). As such, post transaction 40MHz of 2.3GHz; SUF = €368,0256 + CPI adjustment [2.3GHz Band Generic: €52,575* 6 (5MHz Block) = €315,450 + CPI & 2.3GHz Band Fixed: €52,575 * 110MHz block = € 52,575 +CPI].

Market Information:

- a description and definition of what the Notifying Party/Parties consider to be the relevant upstream and downstream markets that may be affected by the proposed spectrum Transfer or Lease. This should be informed by the proposed usage of the spectrum which it is proposed to be transferred or leased
- an estimate of the size of the markets described above, information on recent entry, any potential entry, cost of entry, comment on the minimum efficient scale and minimum spectrum requirements for a viable business.

The transfer is relevant to the retail mobile market and the wholesale mobile market in Ireland. The Spectrum will be used to augment the provision of mobile services to eir's retail and wholesale customers. Eir has a 14.6% share of retail mobile market subscribers including MBB and M2M. Eir has a 24.4% share of retail mobile market subscription excluding MBB and M2M. Eir has a retail mobile revenue share of 19%. Vodafone and Three account for 70.8%. Eir is a recent new entrant into the wholesale mobile market hosting the MVNO service of Lycamobile and is engaged in discussions with other potential partners.

Market metrics per ComReg Q2 QKDR, ComReg 25/57

Views of Notifying Parties:

- views as to why the Notifying Parties consider that the Transfer or Lease will not distort competition in the markets described by you above in the State.
- estimates of the shares of each of the Transferee or Lessee (including aggregated market share of any relevant group companies) and of the Transferor or Lessor in the market(s) described by you above. Provide also estimates of the shares of competitors in these markets and explain the basis of these estimates.
- views as to possible efficiencies which may occur as a result of the Transfer or Lease. Please quantify these efficiencies and the extent to which consumers would benefit from them.
- views as to why the Notifying Parties are of the view that the Transfer or Lease does not create a risk of harmful radio interference.

Please see above and ComReg 25/57 for market data.

Eir considers that the proposed transaction will have a positive effect on competition in the markets. The transaction will assist in strengthening the retail and wholesale services eir offers in competition to Vodafone and Three (who have combined market share in excess of 70% for both subscribers and revenue). The additional spectrum offers the ability to support more customers with additional capacity and higher performing competitive services with additional speed and quality. The proposed transaction helps redress the historic spectrum imbalance between eir and the other mobile network operators. Post the proposed transaction eir would have access to 315 MHz of harmonised mobile spectrum compared to Vodafone with 355 MHz and Three with 350 MHz. Eir notes that the acquisition of this quantum of additional spectrum would have been permitted within the MBSA 2 competition spectrum caps. Given that the MBSA 2 process only concluded recently in 2023 it must be assumed that a combined allocation below the caps should not raise any concerns regarding hoarding or reducing competition, particularly where the transferee does not have a position in the relevant mobile markets suggestive of market power.

BCP IV is not currently providing electronic communications services or making use of the MBSA2 licence at present in the market.

The proposed transfer will not create a risk of harmful radio interference as the spectrum is adjacent to eir only in the band and will be operated in accordance with the licence conditions and international harmonisation decisions.

Ancillary Restraints:

- Provide details of any arrangements constituting restrictions which you believe are directly related and necessary to the implementation of the proposed transaction. Justify how, in your view, each such arrangement is directly related and necessary to the implementation of the proposed transaction in the State

The proposed transfer does not have any restrictions. Eir will step into BCP IV's obligations in full respect of the 2.3 GHz spectrum.