

## **Eir Response to ComReg's Further Questions on WN2025-021 (Received 6 October 2025)**

**Q1** – In the Pricing Compliance Statement CRD1181 v1.0 received on 8 August 2025 (“the PCS”) several of the tables refer to “FTTH Growth Target on FTTH base”. “FTTH Growth Target on FTTH base” could be interpreted to refer to the total connections/additions by reference to the opening base, or to refer to the number of connections added in a period less cessations. By way of illustration, if the Access Seeker has an opening base of 20,000 Eircom FTTH customers and achieves 2,000 new Eircom FTTH connections while also losing 2,000 Eircom FTTH customers, the Eircom FTTH base doesn't grow as it still 20,000 at the end of the period. Please confirm that “FTTH Growth Target on FTTH base” refers to the total connections/additions that the Access Seeker achieves (e.g. +2,000) rather than additions less cessations (e.g. 2,000 - 2,000)?

**Open eir response:** The “FTTH Growth Target on FTTH base” refers to net growth over the promotional period. Specifically, it is calculated by comparing the FTTH base at the start of the eligibility window (01 June 2026) with the FTTH base at the end of the window (30 November 2026). This means that cessations are taken into account, and only net additions contribute toward meeting the growth thresholds for the purposes of the discount scheme. . We believe that this ensures fairness and equality for Access Seekers e.g if it was not as Eircom has structured (net additions), those Access Seekers who achieve growth without significant cessations, would, in terms of the discount, be treated the same as this Access Seekers who had achieved minimal net growth.

**Q2** – The PCS includes the statement “Customers who upgrade or downgrade their FTTH profile during the promotional period from 01 June to 30 November 2026 and remain with the same wholesale customer will still qualify for the discount, which will be applied in January 2027. However, if they change their FTTH profile after the discount has started to be applied, the promotion will end.” Please provide the rationale why following an upgrade or downgrade outside the 6-month promotional period the discount is no longer applied?

**Open eir response:** The original intention behind applying this rule was to address system and billing limitations. However, following an internal review, we can confirm that the billing issues have now been resolved, and the rule has been removed.  
As a result, where a new FTTH connection is made within the promotional period, any subsequent upgrade or downgrade to another qualifying FTTH profile will continue to be eligible for the discount.

**Q3** – On slide 7 of the Annex to Pricing Compliance Statement CRD1181 received on 8 August 2025 (“the Annex to the PCS”) Eircom presents data on the “FTTC Eircodes” over time and by Access Seeker. Please confirm whether this includes only “FTTC Eircodes”, or whether it includes both FTTC and copper (CGA) Eircodes?

**Open eir response:** The “FTTC Eircodes” referenced in slide 7 of the Annex to the PCS include both FTTC and copper (CGA) Eircodes. This broader definition reflects the full legacy broadband base from which FTTH migrations may occur and aligns with the eligibility criteria for Part B of the promotion. open eir only has access to circa [X] of FTTC Eircodes.

**Q4** – Please confirm that under WN2025-021 the Access Seeker would receive the same FTTH VUA monthly rental discount when it purchases FTTH VUA either as a standalone VUA service or as part of an Eircom Bitstream service?

**Open eir response:** Yes, the FTTH VUA monthly rental discount under WN2025-021 applies equally whether the FTTH VUA is purchased as a standalone service or as part of an Eircom Bitstream service. The discount is applied equally at the wholesale level.

**Q5 –** Under the promotion notified as WN2024-021 and approved under ComReg Decision D21/24, Eircom offered a €2 discount on monthly rental for 24 months for any connections to 1GB FTTH. The promotion was available for a 6-month window which commenced on 3 November 2024 and ended on 30 April 2025. On slides 8 & 9 of the Annex to the PCS Eircom presents data on the “the Case of 1GB” which shows the impact of WN2024-021 for November 2024 – the first month of the promotion. Please provide details of the impact of WN2024-021 for the entire 6-month period ending 30 April 2025 and how WN2024-021 performed in relation to its aim of incentivising “all operators to upgrade their retail customers to a 1 Gbps profile speed”. Please also provide an analysis of the impact by Access Seeker and by month, similar to slide 9 of the Annex to the PCS. In addition, please provide an analysis of the uptake of the promotion between migrations from FTTC, upgrades from existing Eircom FTTH and new Eircom FTTH connections. Finally, please provide a list of the Eircodes of the premises that qualified in the 6-month window ending on 30 April 2025 for the discount notified as WN2024-021.

**Open eir response:** open eir is preparing a detailed analysis of the full 6-month impact of WN2024-021 (03 November 2024 – 30 April 2025), including:

- Monthly uptake by wholesale customer
- Breakdown by connection type:
  - FTTC to FTTH migrations
  - Upgrades from existing FTTH
  - New FTTH connections
- A list of qualifying Eircodes

This data will be provided separately.

**Q6 –** The promotion notified as WN2025-002 and approved under ComReg Decision D05/25 includes a €2 discount on monthly rental for 24 months for migrations from FTTC to FTTH. The promotion is available for an 8-month window which commenced on 1 August 2025. Please provide details of the impact of WN2025-002 to date and how WN2025-002 is performing in relation to its aim of incentivising “FTTC – FTTH generally, but also to remedy a lower rate of migration for ‘other operators’”? Please provide an analysis of the impact by Access Seeker and by month. Also please provide a list of Eircodes of the premises that have qualified for the discount to date.

**Open eir response:** open eir is compiling performance data for WN2025-002 (effective from 01 August 2025), including:

- Monthly uptake by wholesale customer
- Analysis of migration trends, particularly among “other operators”
- A list of qualifying Eircodes to date

This information will also be provided separately.