



Report for ComReg

Review of maximum permitted emergency call handling fee for 2027/2028

29 October 2026

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1 Introduction

In Ireland, the emergency services are called by dialling 999 or 112, and these calls are initially received by the Emergency Call Answering Service (ECAS). Emergency calls are currently free of charge to the caller on all networks. The ECAS is funded through the Call Handling Fee (CHF). The CHF is charged by the ECAS operator, BT Business Telecoms Ireland Ltd (BTBTIL), to the operator on whose network the emergency call originates.

The current CHF is EUR3.96 per call, as determined by the Commission for Communications Regulation (ComReg) in January 2026, pursuant to Section 58D (1) of the Communications Regulation Act 2002 (as amended). The contract between the Department of Culture, Communications and Sport (DCCS) and the ECAS operator is approaching its annual review point, which triggers an assessment of the maximum permitted CHF that the ECAS operator can charge for handling emergency calls.

ComReg has selected Analysys Mason to provide assistance in relation to the CHF review. This report sets out the findings of our work:

- Chapter 2 sets out our cost review
- Chapter 3 presents our review of call volumes
- Chapter 4 sets out the new CHF and our explanation and quantification of the main contributors to the change in CHF

Items in this report marked with [X] have been redacted in the version for publication due to confidentiality requirements.

1.1 Operating period

BTBTIL's current model runs to November 2027. However, ComReg's obligation is to set the CHF for a twelve-month period, from 12 February 2027 to 11 February 2028. For the purposes of this review, we have therefore extended the modelling period to 11 February 2028 (the "further extension") by estimating costs on a pro rata basis. While the model now reflects an extended operating period, the bid totals referenced throughout this report remain based on the original operating period.

2 Cost review

The cost review provides an assessment of whether or not the costs borne by BTBTIL in operating the ECAS since 1 July 2025 and the associated cost forecasts, are reasonable and whether any could be considered unnecessary, avoidable or excessive.

The main cost components of the ECAS are operating costs, depreciation and financial costs, as shown in Figure 2.1 below. Total costs are presented in this report as follows:

- ‘Bid Total’ represents the total projected costs at the time the ECAS contract was awarded to BTBTIL based on the original operating period.
- ‘Contract Total (2025)’ represents the total costs projected by BTBTIL during the 2025 CHF review for the initially extended operating period to November 2027
- ‘Contract Total (2026)’ represents the total modelled costs to 11 February 2028, including the further extension considered for the purposes of setting the CHF.

Figure 2.1: Total costs [Source: BTBTIL, Analysys Mason, 2026]

[X]

The total projected costs for the ECAS operating period are estimated at [X], an increase of [X] compared to the 2025 costs. The total projected cost represents a net cost increase of [X] compared to the Bid Total for the original operating period. The increase in costs compared to the Bid Total is mainly driven by the longer contract duration as well as an increase in call volumes which resulted in reasonable costs over and above those forecast at the time of the bid.

We have reviewed the latest actual and forecast operating costs, depreciation and financial costs and determined that these are reasonable and in line with forecasts seen for the original operating period.

While our CHF review has been supported by multiple meetings with BTBTIL, multiple iterations of a model with revenues and costs broken out on a quarterly basis and a written question and answer process, we have not had visibility of BTBTIL’s audited accounts or quarterly management accounts. However, we understand that ComReg has conducted a review of them. We recommend that this documentation continues to be considered in future CHF reviews such as the over-recovery / under-recovery calculation planned after the expiry of the ECAS contract.

The following subsections present an assessment of the changes within each of the three cost categories: operating costs, depreciation and financial costs.

2.1 Operating costs

The main components of ECAS operating costs are shown in Figure 2.2 below.

Figure 2.2: Operating costs [Source: BTBTIL, Analysys Mason, 2026]

[X]

As of October 2026, the total projected operating costs for the operating period are estimated at [X], an increase of [X] compared to 2025, the period under review. The total projected cost represents a net cost increase of [X] compared to the Bid Total.

The main causes of change in the operating costs for the period under review are described below.

Total staff costs

Since the previous review, total staff costs (general BTBTIL staff and call centre staff) have increased by [X] or [X] over the operating period. This increase is primarily attributed to the further extension considered for the purposes of setting the CHF.

General BTBTIL staff costs have increased by [X]. This is offset by lower support-labour and other staff-cost allocations following the divestment of part of BTBTIL's Irish business in 2025, together with the rebasing of forecast costs to reflect the lower costs actually incurred. Lower allocations for life assurance and health insurance also contributed to reductions.

There was also an increase of [X] in call-centre staff costs. The increase reflects pay increases arising from salary inflation and statutory minimum wage increases, together with approximately 2.5 additional call-centre FTEs compared with 2024/25 which we understand is primarily to address rising call volumes. This increase was moderated by lower first-line manager costs due to a period of maternity and parental leave, and reductions in HR-resource and bonus-provision costs.

Maintenance

Since the previous review, maintenance costs have increased by [X] over the operating period. The increase is primarily driven by additional software, support and data-management costs.

Key drivers include the introduction of a direct charge for the Eircode database following the divestment of BT's domestic network business in Ireland, increased PUCA costs associated with SMS software upgrades and ongoing support, additional Elastic search software licence charges supporting the NGX platform following a review of licence utilisation, and higher Cisco network equipment support costs resulting from changes to supplier discount and rebate structures. A provision has also been included for potential future storage-capacity upgrades, which would be subject to agreement with DCCS through the change-control process if required.

Network services

Since the previous review, network service costs have increased by [X] over the operating period. This increase is primarily attributed to the further extension considered for the purposes of setting the CHF. This increase also reflects higher datacentre charges following the disposal of BTBTIL's Irish

datacentres to Equinix in November 2025. The charges are now incurred at third-party commercial rates. The increase is partly offset by reductions in other forecast network-services costs.

Premises

Since the previous review, premises costs have increased by [£] over the operating period. The increase is primarily driven by higher facilities-management costs following the divestment of BTBTIL's domestic network business in Ireland, with responsibility for facilities management transferred to CBRE, and higher Clonsbaugh access charges now incurred on a third-party commercial basis. Additional costs include catch-up charges for facilities services, [£] of repairs to the roof and windows of the public safety answering point in Navan, and replacement of power supply equipment that reached end of life.

Other

Since the previous review, costs categorised as 'other costs' have increase by [£] over the operating period. This change is not material.

2.2 Depreciation

The main components of ECAS depreciation costs are shown in Figure 2.3 below.

Figure 2.3: Depreciation [Source: BTBTIL, Analysys Mason, 2026]

[£]

As of October 2026, the total projected depreciation costs for the ECAS operating period are estimated at [£], an increase of [£] in comparison to the previous review. The total projected cost represents a net cost increase of [£] compared to the Bid Total.

The key contributors to that change are described below.

Set-up costs

Since the previous review, set-up costs¹ have not changed for the operating period.

Other

Refresh costs are costs put in place to allow for replacement of certain network items during the lifetime of the ECAS contract as well as feature additions approved by DCCS. Since the previous review, projected refresh-cost depreciation has increased by [£]. This comprises [£] for the session border controller upgrade, approved by DCCS under change control in April 2026, offset by

¹ Set-up costs are those costs which allow BTBTIL to recover the initial capital expenditure associated with its deployment of the ECAS.

[£] for end-of-life uninterruptible power supply replacement expenditure previously included in forecast capital expenditure and now recorded within premises operating costs.

2.3 Financial costs

The main components of ECAS financial costs are shown in Figure 2.4 below.

Figure 2.4: Financial costs [Source: BTBTIL, Analysys Mason, 2026]

[£]

As of October 2026, the total projected financial costs for the operating period are estimated at [£], an increase of [£] compared to 2025, the period under review. The total projected cost represents a net increase of [£] compared to the Bid Total.

We have reviewed the detailed operating costs, depreciation and financial costs modelled to November 2027 and consider them reasonable on the basis of the supporting information provided.

3 Call volumes

3.1 Call volumes to date

In updating the call volume forecast, BTBTIL and ComReg have been mindful of the contribution of silent, abandoned and noisy calls to total ECAS call volumes. Silent calls are those in which the calling party does not speak or provide input to the operator when the call is answered, whilst abandoned calls are those calls of extremely short duration which are terminated before the call can be answered by an operator. Noisy calls are those in which the audio is disrupted by interference, static or background noise, making it difficult for the operator to hear or understand the caller.

Silent call volumes saw a steep decline in 2024, dropping from 981 696 in 2023 to 743 231, following a mid-2023 Android software update that resolved a temporary spike. While the 2024 forecast had anticipated a volume of approximately 730 000, the actual figure came in slightly higher, at 743 231, but still well below the 2023 peak. Between January and August 2026 silent calls totalled 528 837, up from 521 918 for the same period in 2025, a 1.3% increase.

Abandoned calls continue to decline as seen in last year's review. Between January and August 2026 abandoned calls totalled 37 036, down from 37 614 for the same period in 2025, a 2% decrease.

The trend of declining noisy calls also persists, with volumes expected to drop to 3650 in 2027.

Meanwhile, the increasing trend in normal call volumes seen to date is expected to continue, with volumes anticipated to rise by 8% from 1.25 million in 2025 to 1.35 million in 2026 as shown in Figure 3.1 below.

Figure 3.1: Contribution to total annual (calendar year) call volumes by type² [Source: BTBTIL, Analysys Mason, 2026]

[X<]

3.2 Call volume forecast to end of operating period

BTBTIL's call volume forecast, as shown in Figure 3.2 below, has allowed for an increase in normal calls for future year forecasts owing to population, economic growth and changes in weather patterns, whilst noisy calls are expected to decline due to network upgrades by operators and a reduction in the use of voice services on fixed-line networks. A slight increase in silent and abandoned calls is anticipated, linked to the same variables influencing normal call volumes.

² Numbers may differ slightly from last year's report due to rounding in source data.

Figure 3.2: Forecasted call volumes 2027 vs 2025/26 for year ending August [Source: BTBTIL, Analysys Mason, 2026]

Classification	Sep 25 – Aug 26		Forecast 2027		Change
	Daily volume	Yearly volume	Daily volume	Yearly volume	
Normal calls	3666	1 338 090	3740	1 365 100	2.0%
Noisy	13	4745	10	3650	-23.1%
Abandoned	157	57 305	160	58 400	1.9%
Silent	2113	771 245	2140	781 100	1.3%
Other	363	132 495	365	133 225	0.6%
Total	6312	2 303 880	6415	2 341 475	1.6%

The annual call volumes for the contract to date and the forecast for the remaining 105-month operating period are shown in Figure 3.3 below. Note that the period ending March 2020 (Year 1) was a 13-month period, while BTBTIL assumes that the period ending November 2027 (Year 9) will be an 8-month period, which contributes to volumes that are respectively higher and lower than average³.

Figure 3.3: Call volume forecast per financial year [Source: BTBTIL, Analysys Mason, 2026]

[X]

While the previous CHF review forecast that total call volumes for the 12-month period ending March 2026 (Y7) would be c.2 250 682, the actual outcome was 2 222 682, or 1.2% fewer calls than forecast.

Looking ahead, while the total call volume for the 12-month period ending March 2027 (Y8) remains to be seen, the increase in normal calls in 2026 suggests that the total may be 2 337 116, or approximately 5.1% higher than the Year 7 actual outcome. The apparent decline in year 9 is due to BTBTIL's assumption that it will be a shorter financial year.

This forecast appears reasonable based on the data available, recent trends and the requirement to ensure that the CHF is set to ensure recovery of costs without large adjustments to the CHF in the final years of the operating period.

3.3 Change in call volumes

The net change in total call volumes across the operating period is shown in Figure 3.4 below.

³ The model includes continuation of services from December 2027 to 11 February 2028, aligning the modelled end date with the end of the twelve-month CHF period commencing on 12 February 2027

Figure 3.4: Call volumes [Source: BTBTIL, Analysys Mason, 2026]

[X<]

As of October 2026, the total projected call volumes for the operating period are estimated at 20.53 million, an increase of 3% compared to the previous CHF review. This increase in call volumes has a downward impact on the CHF. The total projected call volume represents a net increase of 66.6% compared to the bid total.

4 Calculation of the CHF

The ECAS model requires the calculation of the CHF to take account of actual and forecast costs and volumes, such that the ECAS operator achieves the guaranteed return over the operating period.

To support the calculation of the CHF, Analysys Mason reviewed a draft CHF model provided by BTBTIL and participated in workshops with ComReg and BTBTIL to determine reasonable costs and volumes. Subsequently, BTBTIL provided an updated cost model⁴ and supporting information, taking account of the feedback provided.

Based on the reasonable cost review and updated CHF model, the new CHF is calculated at EUR3.82 for the period commencing 12 February 2027 to 11 February 2028.

Explanation and quantification of the main contributors to the change in CHF

In summary, the primary contributors to the change in CHF as discussed in Sections 2 and 3 of this report are:

- an increase in operating costs, including premises and maintenance costs, as outlined in Section 2.1
- a small increase in depreciation costs, reflecting the SBC upgrade offset by the reclassification of UPS replacement expenditure to operating costs
- an increase in actual and forecast call volumes due to an increase in normal call volumes arising from population changes, economic activity and weather patterns

The amount by which each of these contributors affected the CHF is set out in Figure 4.1 below.

⁴ Filename : "ECAS II QMA (OBM format) to Q1 26-27 (to 30-06-2026) with Extra Yr Scenario" (provided via email 11th September 2026)

Figure 4.1: Contribution of changes to the new CHF for 2027/28 [Source: Analysys Mason, 2026]

Item	EUR	Inputs
CHF 2025/26 (EUR)	3.96	
1. Increase in operating costs (EUR)		[X]
Corresponding volumes (12 Feb 2027 to 11 Feb 2028)		2 338 282
Impact on CHF (EUR)	[X]	
2. Depreciation (EUR)		[X]
Corresponding volumes (12 Feb 2027 to 11 Feb 2028)		2 338 282
Impact on CHF (EUR)	[X]	
3. Increase in revenue due to higher call volumes	[X]	
CHF 2027/28 (EUR)	3.82	

5 Summary

Overall compared to the previous CHF review, total costs over the operating period are higher and there are more calls. The increase in actual and forecast call volumes more than offsets the increase in costs, including those associated with continuation services to 11 February 2028. Based on the reasonable cost review and updated CHF model, the CHF is calculated at EUR3.82 for the period commencing 12 February 2027 to 11 February 2028, a decrease from the current CHF of EUR3.96.