



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Strategy Statement 2025-2027

Response to Consultation

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Related documents

Consultation on draft Strategy Statement 2025-2027	24/103R
Strategy Statement 2025-2027	25/37
Strategy Statement 2025-2027: Consultation non-confidential Submissions	25/37a

Content

Section	Page
1 Introduction.....	4
2 Consultation Responses – Strategy Statement sections	6
2.1 ComReg’s Mandate	6
2.2 ComReg’s Vision.....	6
2.3 ComReg’s Values	7
2.4 Strategic Priority 1 – Connectivity, competition, and Investment.....	7
2.5 Strategic Priority 2 – Consumer protection and empowerment	8
2.6 Strategic Priority 3 – Cybersecurity and resilience	9
2.7 Strategic Priority 4 – Compliance and enforcement	10
2.8 Strategic Priority 5 – Our organisation	11
3 Consultation Responses – Other Topics.....	12
3.1 Strategy Statement Section 4 – A Changing Environment.....	12
3.2 Regulatory harmonisation	12
3.3 New Powers and Functions.....	13
3.4 Existing Powers and Functionality.....	14
3.5 Regulatory burden.....	16
3.6 Revision of the EECC	17
3.7 Strategy / Action Plan linkage	18
3.8 Copper switch-off	18
3.9 Sustainability	19
3.10 Alignment with other strategies	19
3.11 Postal matters	20

1 Introduction

- 1.1 The Commission for Communications Regulation (**'ComReg'**) is responsible for regulating communications products and services in Ireland including, but not limited to, postal services, premium rate services, electronic communications networks and services, emergency call answering and public warning communications, and radio spectrum. We have been assigned new roles in respect of accessibility requirements for end users and physical resilience. Additionally, we expect to be assigned further responsibilities in new sectors over the lifetime of the 2025-2027 Strategy Statement. These sectors are likely to include cybersecurity and access to, and use of, data.
- 1.2 In December 2024, ComReg issued its Draft 2025–2027 Strategy Statement (the **'draft Strategy Statement'**) for public consultation (the **'Consultation'**).¹ We have decided to merge our three existing separate strategy statements on postal services, radio spectrum management, and electronic communications, into a single all-of-ComReg strategy statement. To facilitate this, our Strategy Statement is a higher-level, principles-based communication of our strategy for the next several years.
- 1.3 ComReg received eight submissions to the Consultation (the **'Submissions'**); seven from industry operators and one from a representative body (together, the **'Respondent(s)'**).² The list of Respondents is as follows:³
- Association of Licenced Telecommunications Operators (**'ALTO'**);
 - Eircom Limited (**'eir'**);
 - Virgin Media Ireland Limited (**'Virgin Media'**);
 - Sky Ireland Limited (**'Sky'**);
 - BT Communications Ireland Limited (**'BT'**);
 - Siro DAC (**'SIRO'**);
 - An Post (**'An Post'**); and
 - Twilio Incorporated (**'Twilio'**).
- 1.4 This Response to Consultation summarises Respondent Submissions thematically, and ComReg's responses to them. Section 2 deals with comments addressed at specific portions of the Strategy Statement. Section 3 deals with general comments and themes not addressed at specific portions of the Strategy Statement, but which

¹ Strategy Statement 2025-2027 - Draft for Public Consultation. Reference: ComReg 24/103R.

² All Respondents indicated that their responses were non-confidential.

³ Respondent Submissions are published separately as ComReg document 25/37a.

are relevant to the broader work of ComReg.

- 1.5 In issuing a Consultation and finalising its response set out in this document (the '**Response to Consultation**') and in its 2025-2027 Strategy Statement, ComReg has had regard to its statutory functions, objectives and duties. ComReg is grateful to its stakeholders for all Submissions received in response to the Consultation and the engagement we have received through this process more generally, including Submissions to the Call for Inputs.
- 1.6 ComReg received six Submissions to the Call for Inputs on the Strategy Statement 2025-2027, which concluded in September 2024. Five Submissions were received from industry operators and one from a representative body. The list of Respondents is as follows:⁴
- Association of Licenced Telecommunications Operators ('**ALTO**');
 - Eircom Limited ('**eir**');
 - Three Ireland (Hutchinson) Limited ('**Three**');
 - Cisco Systems Incorporated ('**Cisco**');
 - BT Communications Ireland Limited ('**BT**'); and
 - An Post ('**An Post**').
- 1.7 ComReg has given careful consideration to the Consultation and Call for Inputs Submissions as well as internal research and consultation, strategies of other regulators both domestically and internationally, and proposals for upcoming EU legislation. We have made a number of changes to the final 2025-2027 Strategy Statement to reflect the feedback received during the Consultation. Please note that this Response to Consultation represents ComReg's overall position on the key issues raised by Respondents during the Consultation but does not seek to respond to each individual comment. In the unlikely event that there are any apparent inconsistencies between the Strategy Statement and this Response to Consultation, precedence should be accorded to the Strategy Statement.

⁴ Submissions for the Call for Inputs are not published publicly.

2 Consultation Responses – Strategy Statement sections

2.1 ComReg's Mandate

Summary of Respondent's views

- 2.1 **Virgin Media** suggested that ComReg should, within the 2-year lifetime of the Strategy Statement, commit to making regular one-off amendments should circumstances so require, for example, if ComReg's legislative mandate changes.
- 2.2 **ALTO** submitted that the change in ComReg's mandate will not result in anything other than a widening of its remit – the 'nuts and bolts' market regulation will still be required.

ComReg Response

- 2.3 ComReg disagrees with **Virgin Media's** proposal to issue one-off amendments to the Strategy Statement during its two-year term, in the event of significant developments such as a change in ComReg's mandate. The function of a strategy statement is to indicate at a point in time what we plan to prioritise over its term, to give certainty to stakeholders. ComReg may be required react to certain unforeseen market or legislative developments that arise throughout the lifetime of the strategy statement. A succession of one-off amendments on an ongoing basis would weaken the regulatory certainty that our stakeholders are entitled to expect. Significant developments will be communicated and consulted on through ComReg's existing channels for stakeholder engagement.
- 2.4 ComReg acknowledges **ALTO's** comment that changes in ComReg's mandate will widen its remit, but that our regulatory role in the telecoms industry is still necessary. ComReg is committed to ensuring that carrying out its new functions does not come at the expense of its existing ones.

2.2 ComReg's Vision

Summary of Respondent's views

- 2.5 **SIRO** believed that ComReg's vision lacks an emphasis on investment and competition, and focussed excessively on the expanded areas of ComReg's remit. Additionally, SIRO considered that ComReg has not had sufficient regard to its role in fulfilling Ireland's Digital Connectivity Strategy and stresses its importance.

ComReg Response

- 2.6 ComReg takes note of **SIRO's** suggestion that the Strategy Statement should call out more explicitly ComReg's role in facilitating the delivery of Ireland's Digital Connectivity Strategy. Additional text has been added to the Mission section of the 2025–2027 Strategy Statement to reflect this.

2.3 ComReg's Values

Summary of Respondent's views

- 2.7 **SIRO** argued that ComReg's values are passive and do not emphasise leadership in shaping telecommunications markets. SIRO suggested a set of reworded values which place strong emphasis on competition between operators enabled by ComReg addressing perceived imbalances in power between incumbent and new entrant operators. SIRO also sought additional steps such as committing to specific rollout targets for 5G and FTTH, and EU regulatory best practices to support that aim.

ComReg Response

- 2.8 ComReg disagrees with **SIRO's** comments on ComReg's values. The role of ComReg's values is to communicate the guiding principles that govern our decision making and how we conduct ourselves, rather than making policy commitments in the telecommunications sector. Additionally, in the context of our expanded remit, the proposals made by SIRO are too narrowly focussed on telecommunications and ignore our responsibilities in other sectors. Our updated vision sets out what we intend to accomplish over the lifetime of the Strategy Statement across our range of responsibilities, including telecommunications.

2.4 Strategic Priority 1 – Connectivity, competition, and Investment

Summary of Respondent's views

- 2.9 **An Post** considered that Strategic Priority 1 reflected an apparent de-prioritisation of postal services in the draft Strategy Statement and a lack of consideration for postal services. An Post contended, in particular, that postal should be included under ComReg's proposed Strategic Priority 1.
- 2.10 **SIRO** considered that Strategic Priority 1 reflected a passive stance in the contexts of wholesale regulation and network rollout. SIRO believed that Strategic Priority 1 relies too heavily on market forces without sufficient commitment to shaping market competition through *ex ante* regulation. Additionally, SIRO argued that ComReg should place further emphasis on accelerating FTTH and 5G rollout and commit to specific rollout metrics, as well as pricing and market share of new entrants.

ComReg Response

- 2.11 ComReg notes **An Post's** contention that postal services should be included under Strategic Priority 1. However, ComReg has a statutory objective to “*facilitate the development of competition and innovation in the market for postal service provision*” but not ‘promote’ competition as outlined in Strategic Priority 1. Further, this statutory objective sits alongside the objective to “*promote the development of the postal sector and, in particular, the availability of a universal postal service within, to and from the State at an affordable price for the benefit of all postal service users.*” ComReg’s remit for competition in the postal sector is different to that in the telecommunications sector. As such, including postal services under Strategic Priority 1 would fail to accurately reflect our different statutory obligations across the postal and other sectors within our remit.
- 2.12 ComReg notes **SIRO's** observations on specific and detailed policy proposals with respect to the regulation of wholesale telecoms markets. However, the transition to a short, principles-based, all-of-ComReg Strategy Statement means that specific policy proposals amount to a level of detail which is not appropriate for a strategy statement. These comments have been drawn to the attention of the relevant ComReg teams.
- 2.13 In respect of **SIRO's** contention that the language in the Strategy Statement on wholesale regulation reflects a passive stance, ComReg has amended text in paragraph 5.2 of the 2025-2027 Strategy Statement making our view that competition and investment are complementary more explicit and added to paragraph 4.4 of the 2025-2027 Strategy Statement to emphasise our commitment to reintervene in previously deregulated markets on an *ex ante* or *ex post* basis where warranted by the evidence from our market monitoring activities.

2.5 Strategic Priority 2 – Consumer protection and empowerment

Summary of Respondent's views

- 2.14 **SIRO** contended that enforcement of consumer protection rules needs to be balanced against operator viability. SIRO argued that overly prescriptive and heavy-handed application of ComReg’s consumer protection mandate could harm competition through discouraging market entry and being a disproportionate burden for smaller operators. SIRO further argued that consumer protection should be pursued as a byproduct of effective retail competition, and that existing consumer protection regulations should be regularly reviewed for potential removal, replacement or reduction.
- 2.15 **ALTO** welcomed ComReg’s proposal to focus more on consumer experience and

urged that, where intervention is necessary on the basis of consumer harm, it should be targeted at the areas where harm is greatest and not suffer from scope creep. ALTO outlined three principles which it considers would ensure this.

ComReg Response

- 2.16 ComReg disagrees with **SIRO's** comment that consumer protection should primarily be pursued as a byproduct of effective retail competition. While retail competition is an enabler of competition, it is not always a guarantee that consumers are not suffering harm from their provider. Retail competition should, generally, deliver good outcomes for consumers, but where it does not, ComReg has the power to protect consumers from harm through consumer protection regulation.
- 2.17 Both the **SIRO** and **ALTO** comments offer specific and detailed policy proposals with respect to consumer protection regulation. However, ComReg's view is that specific proposals are beyond the scope of the 2025-2027 Strategy Statement due to moving to a shorter, principles-based, all-of-ComReg Strategy Statement. These comments have been drawn to the attention of the relevant ComReg teams.

2.6 Strategic Priority 3 – Cybersecurity and resilience

Summary of Respondent's views

- 2.18 **An Post** noted that ComReg should take into account evolving security requirements for postal networks and other delivery operators, and the investment that entails, when considering the compliance costs for operators stemming from new legislation.
- 2.19 **ALTO** recommended that ComReg take a mutual recognition approach to audits which would allow global-level audits to be acceptable evidence of proof of compliance. It believed this would achieve the same outcome as national-level audits. ALTO argued that this approach would ease implementation for large entities headquartered in Ireland that have global policies across multiple regulatory regimes.
- 2.20 **ALTO** noted the late transposition of the NIS2 Directive and Article 40 of the European Electronic Communications Code ('**EECC**'), and that, accordingly, operators should have a suitable time period for compliance.
- 2.21 **ALTO** urged ComReg to take a risk-based and collaborative approach to assessing entities in-scope, and to embrace simplification and harmonisation in its implementation of network security and resilience measures, particularly to ensure harmonisation with accompanying Implementing Acts.
- 2.22 **eir** argued that NIS2 legislation applies across many sectors and ComReg must work with other supervisory bodies within Ireland to ensure NIS2 is applied in a proportionate and consistent manner across all relevant sectors.

ComReg Response

- 2.23 In response to **An Post**, ComReg is not so far identified as a candidate National Competent Authority under NIS2 for the postal and courier sector and therefore has limited capacity to respond. An Post's comments will be considered, should this arise.
- 2.24 ComReg notes **ALTO's** comments on a mutual recognition approach for audits. However, ComReg's view is that specific proposals are beyond the scope of the Strategy Statement and are better addressed through other fora. These comments have been drawn to the attention of the relevant ComReg teams.
- 2.25 ComReg notes **eir's** comment that, in the context of NIS2, ComReg must work with other supervisory bodies. ComReg will work with other supervisory bodies in Ireland as appropriate to further consistency in approaches across the scope of our activities. ComReg is already active in this field and, on new digital legislation, collaborates with other regulators, such as the Data Protection Commission ('**DPC**'), the Competition and Consumer Protection Commission ('**CCPC**') and Coimisiún na Meán ('**CnaM**'), through the Digital Regulators Group ('**DRG**'). ComReg also engages with the National Cyber Security Centre ('**NCSC**') on cybersecurity matters. Text to this effect has been added to paragraph 4.18 of the 2025-2027 Strategy Statement.
- 2.26 ComReg agrees with **ALTO** that a risk-based approach should be taken to NIS2 compliance, as stated in Article 31 of the NIS2 directive.⁵

2.7 Strategic Priority 4 – Compliance and enforcement

Summary of Respondent's views

- 2.27 **Virgin Media** submitted that Goal 11 of the draft Strategy Statement ("*We have sufficient powers to allow us to incentivise and monitor compliance, and to deter non-compliance*") appears to be more a matter for government rather than ComReg. ComReg's role should be to ensure compliance based on the powers it has been granted. Virgin Media argued that the current text appears to say that ComReg has an objective to pursue additional powers which would not be appropriate.

ComReg Response

- 2.28 Rather than having the objective of pursuing additional powers for its own sake, ComReg ensures compliance based on the powers at its disposal. Where ComReg considers that certain powers are required for it to effectively discharge its statutory functions and responsibilities, it advocates for such powers where necessary.

⁵ Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148 (the '**NIS2 Directive**').

ComReg has amended the text of Goal 11 to clarify.

2.8 Strategic Priority 5 – Our organisation

Summary of Respondent's views

- 2.29 **eir** acknowledged that ComReg's remit will likely expand significantly during the strategy period and recognises the needs for organisational development.
- 2.30 **SIRO** argued that Strategic Priority 5 does not place any emphasis on cost efficiencies, budget transparency or operating in a leaner and more agile manner. SIRO suggested removing middle management to realise cost savings and ensure that industry levies are not excessive. It also reiterated its earlier comments that ComReg needs to take a strong and proactive stance on wholesale regulation in order to achieve competitive market outcomes.
- 2.31 **ALTO** contended that ComReg should take a more proactive leadership role in the forthcoming changes to the sector. ALTO offered engagement with the Retail division during the transposition of the EEC as a good example of proactive engagement and leadership and recommended it as a model for future engagement for ComReg.
- 2.32 **Virgin Media** suggested that it would be worth adding a goal to the effect of “*Maintain strong engagement with all sectors, including to senior levels.*”

ComReg Response

- 2.33 ComReg agrees with **eir's** comments that ComReg's growing remit will require organisational development.
- 2.34 ComReg notes **SIRO's** comments on ComReg's organisational and cost efficiency and its comments to maintain focus on our role in telecoms regulation. Specific proposals on organisational agility are, in our view, beyond the scope of the Strategy Statement. However, ComReg reiterates its commitment that our expanded remit must not be at the expense of our current roles in the telecoms sector.
- 2.35 ComReg disagrees with **SIRO's** comments on ComReg's lack of financial transparency. We publish information in our Annual Report on our expenditure as well as publishing details of all Purchase Invoices over €20,000 on our website.
- 2.36 ComReg welcomes **ALTO's** comments on engaging with the industry as our expanded remit takes shape.
- 2.37 ComReg notes **Virgin Media's** comments on adding a goal on industry engagement. ComReg has added text to Goal 15 of the 2025-2027 Strategy Statement to make explicit our commitment to maintaining engagement with stakeholders across our current and expanded remit.

3 Consultation Responses – Other Topics

3.1 Strategy Statement Section 4 – A Changing Environment

Summary of Respondent's views

- 3.1 **SIRO** contended that ComReg takes a passive approach to the evolving dynamics in the telecommunications market and wider industries. It stated that ComReg should take a proactive role in shaping this changing environment and recognise the risks of complacency.

ComReg Response

- 3.2 As outlined previously, ComReg notes **SIRO's** comments that the language in the Strategy Statement on wholesale regulation, in its view, reflects a passive stance. ComReg has amended text in paragraph 5.2 of the 2025-2027 Strategy Statement making our view that competition and investment are complementary more explicit and added text to paragraph 4.4 to emphasise our commitment to reintervene in previously deregulated markets on an *ex ante* or *ex post* basis, where warranted by the evidence from our market monitoring activities.

3.2 Regulatory harmonisation

Summary of Respondent's views

- 3.3 **Twilio** recommended broader harmonisation of the regulatory framework at EU level as a fragmented landscape can lead to poor outcomes for EU businesses and consumers due to higher compliance costs and frictions in offering services across multiple jurisdictions.
- 3.4 **Virgin Media** submitted that ComReg's additional responsibilities could require certain operators facing greater regulatory demands to engage with ComReg on multiple pieces of legislation at the same time. It contended that, when these situations arise, ComReg should adopt an engagement model that is efficient for both in-scope operators and ComReg alike. Virgin Media also stressed the need for clarity on the remits of various regulators where areas of responsibility overlap.
- 3.5 **An Post** opined that ComReg will need to ensure that it prioritises consistency and alignment with other regulators as its remit expands.

ComReg Response

- 3.6 ComReg notes **Twilio's** comments on the harmonisation of the EU regulatory framework and comments from **An Post** on overlapping responsibilities between regulators. Text has been added to paragraph 4.18 of the 2025-2027 Strategy Statement outlining the work ComReg does, nationally and internationally, collaborating with other regulators to ensure that regulation is applied in a consistent and fair manner than minimises overlap between bodies. ComReg reiterates its comments at paragraph 4.13 to engage internationally in the policy development process, but notes that the proposed reappraisal of the EECC is out of scope for the Strategy Statement.
- 3.7 Similarly, ComReg recalls comments from **Virgin Media** on adopting an engagement model that is efficient for both parties. ComReg already engages with industry stakeholders through a variety of industry fora, and with consumer stakeholders through the Consumer Advisory Panel, and the Mobile Phone and Broadband Taskforce. We reiterate our commitment at paragraph 4.18 of the 2025-2027 Strategy Statement that *"We will engage proactively with all of our stakeholders, paying particular attention to taking the time to develop strong working relationships with our new stakeholders."*

3.3 New Powers and Functions

Summary of Respondent's views

- 3.8 **BT** noted that, over the coming years, ComReg's remit will expand into new areas. BT stated that, while service provider obligations are increasing directly due to the entry into force of legislation and EU instruments, they are also increasing indirectly as their business partners contractually pass through new obligations.
- 3.9 **ALTO** expressed concern that modifications to ComReg's remit under Irish or EU law may mean that incumbent networks see an opportunity to throttle competition while ComReg's focus has shifted, resulting in serious market failures.
- 3.10 **Virgin Media** noted that, in some cases, ComReg's precise roles and responsibilities under forthcoming legislation have not yet been finalised. As indicated above, Virgin Media suggested that, as ComReg's remit takes final shape, ComReg should issue one-off amendments to its Strategy Statement and welcomes further industry engagement.
- 3.11 **Virgin Media** also called on ComReg to provide support to operators on new functions. It reiterated that continued engagement and transparency are critical to ensuring that all stakeholders satisfy their regulatory obligations.

- 3.12 Given the significant expansion in ComReg’s remit over the term of the 2025-2027 Strategy Statement, **SIRO** contended that independent oversight bodies should be engaged to evaluate ComReg’s effectiveness in balancing security obligations with digital connectivity priorities, to ensure the taking on of new responsibilities does not come at the expense of our existing remit due to resourcing and cost constraints. SIRO reiterated the potential negative effects to competition and network rollout from a lack of focus on our responsibilities in the telecommunications sector. It suggested ringfencing resources for this purpose while maintaining regulation for access seekers and ensuring that rollout remains a ComReg priority. SIRO opined that a reduced focus on wholesale telecommunications regulation could result in delaying Ireland’s Connectivity Goals and a loss of international competitiveness.

ComReg Response

- 3.13 ComReg notes comments made by **ALTO** and **SIRO** addressing the risk of our expanded remit negatively impacting ComReg’s existing roles and responsibilities. We reiterate our comments added to paragraph 4.17 of the 2025-2027 Strategy Statement that our new mandate must not come at the expense of our existing functions.
- 3.14 As outlined previously in paragraph 2.3 of this document, ComReg disagrees with **Virgin Media**’s recommendation to issue one-off amendments to the Strategy Statement during its two-year term in the event of significant developments such as a change in ComReg’s mandate.
- 3.15 ComReg notes additional comments from **Virgin Media** that industry engagement is critical to operators satisfying their regulatory obligations. We concur, as outlined in paragraph 4.18 and Goal 15 of the 2025-2027 Strategy Statement.
- 3.16 ComReg notes **BT**’s concerns of indirect increases in service provider obligations through contractual terms with their business partners, but the precise details of business partner contracts are out of ComReg’s scope. However, as ComReg takes on new functions and powers, it will engage with new and existing stakeholders while fulfilling its mandate, as set out at Section 4 of the Strategy Statement.

3.4 Existing Powers and Functionality

Summary of Respondent’s views

- 3.17 **Virgin Media** stated that it supports ComReg’s view that, where Significant Market Power (**‘SMP’**) exists, *ex post* powers alone are not sufficient. It argues that *ex ante* regulation should remain in place on relevant wholesale markets until they show evidence of sufficient competition, and strongly supported ComReg’s view that, where SMP exists, the application of *ex post* powers alone is unlikely to be sufficient.

- 3.18 **Virgin Media** stressed that the new roles and responsibilities ComReg will assume in its expanded remit should not come at the expense of its existing responsibilities and welcomed the comments to this effect in the draft Strategy Statement. In particular, it recalled that proper resourcing of ComReg's existing remit will be required, and that learnings can be taken from other regulators whose remits have expanded in recent memory, such as Ofcom in the UK.
- 3.19 **ALTO** expressed disappointment that ComReg did not directly express that focus will be retained on VHCN and WLA market regulation alongside explicit support for new entrants.
- 3.20 **ALTO** submitted that ComReg's expanding mandate should not come at the expense of our current roles and responsibilities in the telecoms sector. In particular, ComReg will still need adequate resourcing to discharge its current functions effectively, despite additional resource requirements under our new functions.
- 3.21 **SIRO** highlighted the risk that the expansion in ComReg's remit could divert focus away from ComReg's existing functions with respect to the regulation of wholesale markets.
- 3.22 As outlined previously in section 3.3 of this document, **SIRO** opined that independent oversight bodies should be engaged to evaluate ComReg's effectiveness in balancing security obligations with digital connectivity priorities, to ensure the taking on of new responsibilities does not come at the expense of our existing remit due to resourcing and cost constraints and that resources should be ringfenced for our functions in telecoms regulation.

ComReg Response

- 3.23 ComReg notes comments made by **Virgin Media**, **ALTO** and **SIRO** addressing the risk of ComReg's expanded remit negatively impacting ComReg's existing roles and responsibilities. We reiterate our comments added to paragraph 4.17 of the 2025-2027 Strategy Statement that our new mandate must not come at the expense of our existing functions.
- 3.24 The detailed and specific proposals outlined by **ALTO** for support for new entrants and **SIRO** on oversight mechanisms and resource ringfencing are at a level of detail which is beyond the scope of the Strategy Statement. ComReg notes that oversight measures are already in place for ComReg's conduct through its own auditors, the Comptroller and Auditor General, and relevant Oireachtas committees.

3.5 Regulatory burden

Summary of Respondent's views

- 3.25 **Sky Ireland** called for ComReg to adopt a holistic view in its engagement with industry across its divisions, and to be mindful of the regulatory burden telecoms operators face. It recommended bundling all consultations from a single piece of legislation together and publishing accompanying timelines to reduce the burden of responding to consultations.
- 3.26 **An Post** claimed that increasing regulatory requirements will result in increased compliance costs to businesses.
- 3.27 **eir** proposed that ComReg should establish a workstream on streamlining regulatory reporting and approval requirements, including *ad hoc* requests. It further commented that the scale and frequency of *ad hoc* requests should be taken into account, particularly where ComReg may have access to this information through internal or other means.
- 3.28 **eir** argued for the need for a process of simplification in the content of upcoming EU legislation including, but not limited to, the Data Act, NIS2 and CER. It contended that the regulatory burden stemming from this legislation could negatively impact investment and innovation, despite agreeing with the positive impact this legislation will have. It sought a simplification workstream in collaboration with industry that would work to eliminate overlapping regulatory reporting requirements and clarify inconsistent definitions.
- 3.29 **ALTO** recommended that any further regulatory obligations should only be implemented after the effectiveness of existing regulation has been assessed. Additionally, any future policy should be technologically neutral and adhere to the aims of simplification.
- 3.30 **BT** asked that ComReg be more mindful of the burden on operators from statutory and informal requests that are not included in the annual action plan. It suggested centralising the process for issuing requests to operators to manage timelines, to monitor when other regulators are issuing relevant consultations, and to avoid key holiday periods.

ComReg Response

- 3.31 ComReg notes **Sky Ireland's** comments on taking a holistic approach to industry engagement and reiterates our commitment in paragraph 4.18 of the 2025-2027 Strategy Statement to maintain consistent and proactive engagement with industry as new regulation is put into place. ComReg disagrees with the suggestion to bundle all consultations from a given piece of legislation together. Different aspects of

legislation may impact different sets of stakeholders across a variety of domains. ComReg will exercise its judgement to balance the burden of consultation response on industry with ensuring that we are engaging with the right sets of stakeholders at the right level of detail to create regulatory certainty.

- 3.32 ComReg notes **An Post's** claim that compliance costs may rise in the face of increasing regulatory requirements. Regulated operators must comply with regulatory requirements. As An Post notes it is not clear whether compliance costs will, in fact, increase. As set out below, ComReg will engage proactively with stakeholders as the shape of future regulation becomes clearer.
- 3.33 ComReg notes comments from **eir** and **BT** on the need for greater coordination of statutory and informal information requests. ComReg will further consider this comment and discuss internally how best to coordinate requests of this nature and to avoid holiday periods.
- 3.34 ComReg has considered comments from both **ALTO** and **eir** on the need for simplification in future policy stemming from EU legislation. ComReg is awaiting additional clarity from the European Commission on simplification in the telecommunications policy landscape, including arising from the forthcoming review of the EECC and the Digital Networks Act ('**DNA**'). ComReg will engage proactively with stakeholders nationally and internationally once further direction has been given. ComReg notes ALTO's suggestion to review existing regulatory obligations before further obligations are applied but considers this beyond the scope of the Strategy Statement. ComReg notes, however, that Regulatory Impact Assessments ('**RIAs**') are carried out when we propose to implement new regulations.

3.6 Revision of the EECC

Summary of Respondent's views

- 3.35 **Twilio** supported ComReg's commitment to actively contribute to BEREC's work in reviewing the EECC and sees this as an opportunity to simplify, harmonise and centralise the European telecommunications regulatory framework. It made two specific points on authorisation-related regulatory obligations and numbering policy to increase efficiencies and realise flexibility for cloud providers.

ComReg Response

- 3.36 ComReg considers **Twilio's** suggestion on revisions to the EECC to be out of the scope of the 2025-2027 Strategy Statement. ComReg refers to its commitments at paragraph 4.13 thereof to engage deeply in policy level at EU level.

3.7 Strategy / Action Plan linkage

Summary of Respondent's views

- 3.37 **Virgin Media** supported ComReg's proposal to move to a single, high-level, principles-based Strategy Statement accompanied by more detailed work plans. It maintained that the revised approach should not reduce the level of engagement ComReg has with stakeholders, and that the Strategy Statement should be part of an ongoing cycle of engagement, rather than its start and end. Additionally, it requested information on the work plans and how industry will engage with them.
- 3.38 **eir** noted that more granular information on ComReg's activities will be available as part of ComReg's annual action plan and favours the adoption of a rolling 12-month action plan rather than the current static 12-month model. It argued that this would give operators better visibility of ComReg's activities on an ongoing basis.

ComReg Response

- 3.39 ComReg considers comments from **Virgin Media** and **eir** that a higher-level Strategy Statement should not decrease information given to operators. ComReg refers to paragraph 4.18 of the 2025-2027 Strategy Statement and our commitment to align our annual action plans against the Strategy Statement to give confidence that our operational planning reflects our strategy planning. ComReg is mandated to produce an annual report that reports on the progress of, and annual action plans that have regard to, the Strategy Statement
- 3.40 ComReg notes **eir's** suggestion to transition to a rolling 12-month action plan from the current static 12-month plan. ComReg regards this request as not viable. ComReg already updates its annual Action Plan on a quarterly basis, and publishes this updated version on its website. The annual workplan is required as part of annual budget and resource planning and cannot be disaggregated to a rolling basis. A rolling action plan would, for instance, necessitate publication of workstreams that have not yet received budget sign-off. ComReg does not consider it prudent to include in its Action Plan items which have not been fully resourced and budgeted.

3.8 Copper switch-off

Summary of Respondent's views

- 3.41 **ALTO** contended that copper switch-off process is a priority for the market and would have liked to see more emphasis on it in the 2025-2027 Strategy Statement.
- 3.42 **SIRO** opined that the 2025-2027 Strategy Statement should outline a clear roadmap for copper switch-off with an emphasis on a seamless transition to fibre networks, which is critical to the Digital Connectivity Strategy. It also contended that the

continued operation of copper networks could delay FTTH rollout by absorbing funds that could be used for further investment.

ComReg Response

- 3.43 ComReg notes comments from **ALTO** and **SIRO** that more emphasis should have been placed on copper switch-off in the Strategy Statement. ComReg refers to paragraphs 4.10 and 4.11 of the 2025-2027 Strategy Statement where additional information has been provided.

3.9 Sustainability

Summary of Respondent's views

- 3.44 **An Post** outlined its commitment to ensuring environmental sustainability in its deliveries and set out targets for cutting carbon emissions its operations. It stated that the postal and delivery sector requires regulation and incentives in the area of environmental sustainability, and that carbon emissions targets should be set for all delivery operators.

ComReg Response

- 3.45 ComReg will act within its remit as set by legislation; its remit is limited to 'postal services' provided by 'postal service providers'. ComReg notes that the Climate Action and Low Carbon Development (Amendment) Act 2021 and as required, in so far as practicable, will discharge its existing functions consistent with the requirements included in that Act. ComReg has no legal remit to set carbon emissions targets.

3.10 Alignment with other strategies

Summary of Respondent's views

- 3.46 **ALTO** called for further focus on Ireland's Digital Connectivity Strategy.
- 3.47 **SIRO** contended that ComReg should commit to being an enabler for the Digital Connectivity Strategy.

ComReg Response

- 3.48 ComReg notes comments from **ALTO** and **SIRO** on a greater focus on Ireland's Digital Connectivity Strategy. ComReg refers to text added to the Introduction of the 2025-2027 Strategy Statement and our existing Goal 1. The Digital Connectivity Strategy is to be reviewed by the Department and we will engage with them as part of this process.

3.11 Postal matters

Summary of Respondent's views

- 3.49 **An Post** expressed its concerns that there is no longer a Strategy Statement specific to the postal sector and that this could lead to a dilution of the specific strategic goals outlined in ComReg's Postal Strategy Statement 2024-2026.
- 3.50 **An Post**, as the designated universal postal service provider, outlined its concerns with the financial sustainability of the Universal Service Obligation ('**USO**'). It stated that declining letter volumes may require amendments to the USO to maintain its financial sustainability and that this should be reflected in the Strategy Statement.
- 3.51 **An Post** outlined that it is committed to servicing vulnerable customers who should not be disadvantaged by the transition to digital services, allowing them to continue to interact with An Post in a medium of their choosing. It also called for the definition of vulnerable customer to be as inclusive and accessible as possible.
- 3.52 **An Post** submitted that ComReg should pursue a proportionate and transparent Accounting Direction and give sufficient clarity in advance of regulatory requirements.
- 3.53 **An Post** stated that Quality of Service ('**QoS**') requirements in relation to monitoring should evolve as customer needs, technology and international trends evolve. QoS metrics should also balance affordability with speed and frequency of delivery.
- 3.54 **An Post** noted that it must accept international inbound mail at rates often below cost that are set by terminal dues agreements entered into by the State. Additionally, it stated that ComReg should take into account the standalone cost of the entirety of the USO when considering An Post's compliance with tariff principles and in any future strategy or policy.

ComReg Response

- 3.55 ComReg disagrees with **An Post's** concerns of de-prioritisation or lack of clarity for postal regulation. ComReg will continue to meet the full legislative requirements as set out in the Communications Regulation (Postal Services) Act 2011, which transposes the Postal Services Directive.
- 3.56 ComReg considers **An Post's** concerns regarding the financial sustainability of the universal postal service and regulatory flexibility. ComReg notes that An Post's Regulatory Accounts 2023⁶ record that the universal postal service is profitable overall at €7m and, in particular, records a profit of €23m on the domestic segment of the universal postal service. Regarding regulatory flexibility, where allowed by

⁶ [M16220-An-Post_Regulatory-Summary-Accounts-2023-V5.pdf](#)

legislation, ComReg has reviewed the universal postal service. In the past, ComReg has made changes including reducing the regulatory remit of universal postal services parcels from up to 20kg to 10kg.

- 3.57 ComReg acknowledges **An Post's** comments in committing to continuing to meet the needs of vulnerable users of the postal service. As required by the Communications Regulation (Postal Services) Act 2011, ComReg has considered and will continue to consider the reasonable needs of all postal service users in specifying the universal postal service.
- 3.58 ComReg notes **An Post's** comments regarding the Accounting Direction and the Quality of Service Requirements. The requirements of both the Accounting Direction and the Quality of Service targets are clear and are required to meet specific statutory requirements. The requirements of the Accounting Direction and Quality of Service targets were established after public consultations and are reasonable, proportionate and transparent. ComReg always takes a reasonable approach to compliance monitoring and is required to monitor and ensure compliance by postal service providers with the obligations imposed on them by or under the Communications Regulation Acts 2002 to 2011 in relation to the provision of postal services, which it has done and will continue to do.
- 3.59 ComReg considers **An Post's** discussion of the pricing of mail services where it addresses two statutory requirements. The first statutory requirement is where An Post sets prices for its universal postal service in domestic mail (posted in Ireland for delivery in Ireland) and outbound international mail. ComReg notes that An Post's Regulatory Accounts 2023 record a profit of c.€23m on domestic universal postal service and a loss of c.€7m on outbound international.
- 3.60 The statutory tariff requirement is that each price of each universal postal service shall be cost-oriented, that is to say each price shall take account of, and reflect the costs of, providing the postal service or part of the postal service concerned. ComReg disagrees that An Post compliance with tariff principles should be by reference to "*the standalone cost of providing the entirety of the USO*". As An Post is aware, ComReg uses the Regulatory Accounts required by ComReg's Accounting Direction that report the costs of each universal postal service.
- 3.61 The second statutory requirement is where **An Post** does not set prices, but enters into terminal dues agreements for its intra-EU international inbound mail (posted in EU for delivery in Ireland). ComReg notes that **An Post's** Regulatory Accounts 2023 record a loss of c.€1m on international inbound intra-EU mail. This statutory requirement is that these intra-EU terminal dues agreements shall be fixed in relation to the costs of processing and delivering incoming cross-border mail. ComReg has no remit for terminal dues rates outside EU.