



An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

# Strategy Statement 2025-2027

Non-confidential submissions to Consultation

## Submissions to Consultation

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**An Coimisiún um Rialáil Cumarsáide**  
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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: Response to Consultation	25/37b

# Content

## Section

1. An Post
2. ALTO
3. BT Ireland
4. Eir
5. SIRO
6. Sky Ireland
7. Twilio
8. Virgin Media Ireland

# An Post

## AN POST'S SUBMISSION TO COMREG'S DRAFT STRATEGY STATEMENT 2025-2027

14 February 2025

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An Post welcomes the opportunity to respond to ComReg's Draft Strategy Statement 2025-2027 (the "Draft Strategy"), which was published in December 2024.

An Post previously submitted to ComReg's Call for Inputs on its Strategy Statement 2025-2027 which was published in August 2024.

An Post reiterates the points made in its previous submission, the content of which remains relevant for consideration and is appended below, along with the following commentary:

### 1. Strategic Importance of the Postal Sector

An Post notes an apparent de-prioritisation of postal services in the Draft Strategy and a lack of consideration for postal services in the overall communications-sector strategy.

Under *Strategic Priority 1 - Connectivity, Competition and Investment*, ComReg omitted to include postal services along with telecommunications networks and radio frequency spectrum.

Postal services are an essential infrastructure and an important component of the overall communications sector. ComReg has a statutory objective to promote the development of the postal sector and to facilitate the development of competition and innovation in postal service provision.<sup>1</sup>

Therefore, postal services should be reflected and expressly included in ComReg's strategic priorities, in particular *Strategic Priority 1 - Connectivity, Competition and Investment*.

### 2. Sustainability of the USO & Flexible Regulation

As changing user needs, a declining letter market and the evolving technological landscape continue to impact the postal sector, ComReg must ensure that the sustainability of the universal postal service is a central priority going forward.

Furthermore, in this changing environment, regulatory flexibility is essential to protect all postal service users and help to secure the long-term financial sustainability of the universal service.

An Post urges ComReg to consider how the financial burden of postal regulation can be reduced in a declining letter market while maintaining a postal service for all.

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<sup>1</sup> ComReg Postal Strategy Statement 2024-2026 at pp. 5 & 9 and s.12 of the Communications Regulation Act, 2002.

Accordingly, the sustainability of the universal postal service should be reflected in ComReg's strategic priorities in the Draft Strategy.

### 3. Postal-specific Strategy Statement

The high-level broad nature of the Draft Strategy could serve to dilute the specific strategic goals that are outlined in ComReg's Postal Strategy Statement 2024-2026.<sup>2</sup>

The lack of specific goals for the postal sector, which were clearly defined in previous strategy statements, could lead to a lack of clarity and strategic direction for the postal sector.

### 4. Consistency of Regulatory Obligations

As ComReg's remit continues to expand over the coming years with increasing responsibilities across a number of emerging areas involving various regulatory frameworks and regulatory bodies, a coherent approach among regulators is vital to ensure consistency and alignment between different regulatory obligations and requirements.

Increasing regulatory requirements, will result in increased compliance costs to businesses. In particular, with regard to the EU's Network & Information Security Directive, ComReg should consider, in its overall Strategy Statement, the evolving security requirements of postal and other delivery operators and the attendant investment required to ensure the robustness and sustainability of the postal network into the future.

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<sup>2</sup> ComReg 23/111 - ComReg Postal Strategy Statement 2024-2026 at p. 5

## An Post Submission to ComReg Strategy Statement 2025-2027

27 September 2024

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### Background

ComReg published a Call for Inputs to inform its 2025-2027 Strategy Statement (the “Proposed Strategy”) on 27 August 2024. An Post welcomes the opportunity to contribute to the Proposed Strategy.

In contrast with previous strategy statements, ComReg proposes to issue a single Strategy Statement encompassing the entirety of its functions from 2025. However, ComReg’s 2024-2026 Postal Strategy Statement will remain in effect until the start of 2026 as scheduled. From 2026 until June 2027, strategic priorities in respect of the regulation of postal services will be provided by the Proposed Strategy.

ComReg is seeking stakeholder views on the trends and challenges which will shape the Proposed Strategy and any other issues ComReg should consider.

An Post contributed to ComReg’s 2024-2026 Postal Strategy Statement on 27 October 2023. Given that less than a year has passed since that submission, the content of that submission remains relevant for consideration and is appended below.

### Introduction

As the postal landscape continues to shift considerably in an increasingly digital era, it remains essential to protect both:

1. the interests of postal service users and
2. the sustainability of the universal service for generations to come.

Further to its submission of 27 October 2023, An Post wishes to provide a number of supplementary comments regarding key considerations for ComReg in shaping the Proposed Strategy.

An Post further urges ComReg to ensure postal matters are adequately considered in the context of the overall cross-sectoral strategy statement and are expressly included in its strategic intents.

#### 1. Sustainability of the Universal Postal Service

An Post is a vital component of Ireland’s economic and social infrastructure, connecting citizens, community and the Government and promising to act for the common good, now and for generations to come

However, it is widely acknowledged that the postal landscape is transforming and postal stakeholders must keep pace with changing consumer needs in order to guard the sustainability of the universal service.

The European Commission is assessing the Postal Services Directive which underpins the EU postal regulatory framework on an ongoing basis. Its recent prospective study on the future of the postal sector highlighted key sectoral trends that will continue to impact and shape postal services across Europe into the future.<sup>3</sup>

In a recent report by the European Regulators Group for Postal Services ("ERGP") on the future needs of the universal service obligation ("USO"), the ERGP recognised that recent developments have had a significant impact on the postal sector, e.g. a change in user needs has provoked a continuing decline of letter mail volumes, which in turn has put pressure on the financial sustainability of the universal service.<sup>4</sup>

According to the ERGP and the European Commission, universal service provision has become increasingly costly, with the majority of EU postal operators indicating that the cost of the universal service has increased over the last ten years:

*"With continuous declining letter mail, and in order to financially sustain the universal service (US) without a disproportionately high burden, USPs in the EU will have to adapt to the developments of the postal sector, by introducing new technology and be more cost efficient."*<sup>5</sup>

In the last ten years, 19 EU countries have made changes to the universal service, mainly regarding the scope of the USO, Quality of Service and access points.<sup>6</sup>

The ERGP has noted that postal regulation could be revised in a number of ways in the future, including the introduction of a lower level of delivery frequency.

As adverted to in the Call for Inputs, technological and legislative developments will impact ComReg's regulatory role and function in the coming years, requiring a flexible regulatory response.

Affording An Post the flexibility to innovate in response to changing customer preferences will ensure their specific needs are met and help to secure the long-term financial sustainability of the

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<sup>3</sup> The Study on the Future of the Postal Sector commissioned by the European Commission (DG GROW) and carried out by RPA Risk & Policy Analysts. Final report yet to be published. Presentation of RPA Risk & Policy Analysts on Workshop 3: Prospective Study on the Future of the Postal Sector

<sup>4</sup> ERGP PLI (23) 7 Report on the Future Needs of the USO

<sup>5</sup> ERGP PL I (23) 11 Report on exploring the Sustainability of the USO

<sup>6</sup> ERGP PL I (23) 11 Report on exploring the Sustainability of the USO



universal service. In an environment where user needs are constantly changing, regulatory flexibility is essential in order to protect all users, particularly vulnerable users, into the future

Given that backdrop, An Post urges ComReg to consider how the financial burden of postal regulation can be reduced in a declining letter market while maintaining an appropriate postal service for all.

This would allow ComReg to fulfil its objectives to promote the development of the postal sector, and, in particular, the availability of a universal postal service within, to and from the State for the benefit of all postal service users and to promote the interests of postal service users.

## **2. Digitisation and Vulnerable Consumers**

As digitisation and e-substitution continue apace, An Post is committed to ensuring that all consumers can access essential services and can communicate with institutions and organisations physically as well as digitally. It is important that all citizens, especially those who are vulnerable and/or digitally disadvantaged are given the tools to interact and do business through a medium of their choosing and not be penalised for not being able to adopt/transition to digital media. As these citizens will continue to rely on more traditional mail services, this right to receive physical mail should be upheld.

Moreover, it is vital that the definition of vulnerable user be as inclusive and accessible as possible. A recent ERGP workshop explored the concept of vulnerable users in the postal sector and identified several groups as potentially falling within its scope: people with disabilities, the elderly, those living in rural/remote or economically disadvantaged areas and refugees and asylum seekers<sup>7</sup>.

## **3. The Accounting Direction**

An Post consistently complies with its legal requirements as stipulated by ComReg in its Accounting Direction. An Post submits that a reasonable, proportionate and transparent approach to the Accounting Direction should be pursued. An Post should have clarity in advance of the objective of regulatory requirements and how An Post can comply without incurring undue and unnecessary expense and delay.

## **4. Quality of Service**

An Post believes that Quality of Service requirements in relation to monitoring should continue to evolve in line with consumer needs, technological advances and international trends. A balance needs to be struck between affordability, speed of delivery and frequency of delivery.

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<sup>7</sup> Cullen International "Postal Stakeholders discuss Vulnerable Postal Users at ERGP Workshop" Final ERGP Report on Vulnerable Users is yet to be published.

Additionally, the on-time delivery targets should be reasonable, proportionate and in line with current and future consumer needs and expectations.

## 5. Pricing

As the designated universal postal service provider, An Post must provide domestic, outbound international and inbound international mail services. An Post is obligated to accept international inbound mail at rates set by terminal dues agreements entered into by the Irish government. These rates are often below cost. This is leading to increasing losses on the inbound international USO segment and depressing the profitability and sustainability of the overall USO.

ComReg should take into consideration the stand alone cost of providing the entirety of the USO when considering the compliance of An Post's services with the tariff principles and in future strategy and policy.

## 6. Environmental Sustainability

As Ireland continues to work towards meeting EU and national 2030 emissions targets, the postal sector will play an essential role in furthering climate neutrality. An Post remains on track to meet our ambitious targets of cutting carbon emissions from our own operations by 50% as well as 50% of our fleet running on alternative fuel sources by 2025.<sup>8</sup>

With a growing electric fleet, An Post is committed to optimising urban and city centre delivery routes, while also ensuring environmentally sustainable deliveries. This is particularly important in urban areas where traffic congestion and air pollution present major challenges to creating sustainable cities.

To actively contribute to the implementation of the EU's ambitious sustainability goals, the postal and delivery sector requires appropriate regulation and incentives. In our view, carbon emissions targets should be set for all delivery operators. However, it is essential that the added value of any sector-specific regulations should first be carefully assessed and that regulation is effective and not merely adding to a disproportionate regulatory burden.

An Post urges ComReg to consider what measures could be introduced to ensure that all postal and delivery operators work to continuously improve their environmental performance.

## 7. Cybersecurity

Given recent legislative developments (e.g. the EU's Network & Information Security Directive) and advances in delivery technology generally, it is timely that ComReg consider, in its overall Strategy Statement, the evolving security requirements of postal and other delivery operators

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<sup>8</sup> An Post Sustainability Report 2023

and the attendant investment required to ensure the robustness and sustainability of the postal network into the future.

## Conclusion

As acknowledged by ComReg, the scope of its role and remit may change in the coming years with the introduction of new regulatory obligations across different sectors. Future regulation of the postal sector, including any additional reporting obligations, mandatory market needs tests or other prescriptive new rules, must effect a careful balance between adding value for users and market players, protecting an essential service and not disproportionately increasing the financial and administrative burden for postal operators.

**ALTO**

# alto

alternative operators in the communications market

**Consultation: ComReg Draft Strategy Statement 2025 - 2027 -  
Ref: 24/103 & 103a**

**Submission By ALTO**

**Date: February 14<sup>th</sup> 2025**

ALTO is pleased to respond to the Consultation: ComReg Draft Strategy Statement 2025 – 2027. Response to Consultation– Ref: 24/103 and 103a.

ALTO welcomes the opportunity to comment on this important Consultation.

ALTO generally supports the effort and work ComReg has put into this Strategy Statement, however we highlight some brief aspirational and missing items which we believe should be considered by ComReg.

ALTO is generally positively disposed towards ComReg's work and interventions on the market. Furthermore, we are also generally positively disposed towards ComReg's engagement with ALTO and the wider communications industry, despite new and different draws on ComReg's resource and talent pool over the past 18 months.

ALTO is keen to see and experience a strong, vibrant, competitive and well-regulated market for communications in Ireland. We note that it is disappointing not to see firm commitments from ComReg to maintain focus on VHCNs and WLA market regulation which will ultimately serve the new entrant and potential new entrant market well. We do not believe that ComReg's new work items should remove core market regulatory focuses for the period 2025 – 2027.

ALTO submits that it is disappointing to note a lack: (1) of overt support for new entrant operators; (2) keen commitment to regulating incumbent operators particularly concerning access to and roll-out of FTTH services within the Draft Statement; and (3) clear supports for the Wholesale communications market for *inter alia* access to the WLA market.

ALTO notes a lack of any proper focus on Ireland's Digital Connectivity Strategy. This is quite disappointing as it is clear that the Gigabit broadband and 5G targets for 2028 and 2030 respectively remain operative and extant at this time.

We also note that the requirement for an orderly copper switch-off remains a key priority for the market and for ComReg and that is something that get a lot more focus across the board – particularly in light of new technologies, the aforementioned Digital Connectivity Strategy and the requirement to facilitate services nationally, and as widely and seamlessly as we possibly can.

ALTO submits that while ComReg is clearly experiencing a change in mandate, that change will not result in anything other than a widening of your remit – the ‘*nuts and bolts*’ market regulation is still required. We understand that resource drivers will mean changes in organisational focus to e.g., NIS2 and Cybersecurity, and that those changes should not be to the detriment of the communications industry as a whole – rather those changes should be complimentary. We submit that ComReg should ensure that the organisation is equipped to handle core communication market interventions and *ex ante* action to handle market failures as and when interventions are deemed necessary to arise.

**Core values and a call to lead:**

ALTO is generally supportive and cognisant of the core values operative within ComReg. We would however call on ComReg to be bolder, to lead more, and to be more efficient. In summary, to lead change, rather than to follow it. A good and complimentary example of leadership was when ComReg’s Retail Division led a lot of very focussed and positive workstreams during the early phases of arranging for national transposition of the EECC or Code – in particular dealing with Title III of the Code. That Division was exemplary in leading. That said, the delays inherent in the transposition were not of ComReg’s doing, and regrettably there are countless more examples of EU legislative instruments that will become directly effective but that are lacking national prioritisation – sector regulators can and should engender certainty which in-turn assists business cases and a market stability. It would be useful to have either collective or unit-by-unit resource focussed on future legislative change within the organisation and to arrange for change within ComReg and externally with the market in a similar or aligned manner.

ALTO generally aligns our submission with what we submitted previously in the ComReg Strategy Statement Call for Inputs, we repeat and augment some remarks and submissions below.

**Consumers and Enterprise Customers Require Different Levels of Protection – Priority 2:**

We welcome ComReg's proposal to focus more on consumer experience moving forward and we hope to see that where intervention is necessary, it is targeted to where there is the most harm without unnecessary scope creep. We would invite ComReg to ensure that (1) all interventions are clearly targeting specific group of customers, (2) regulatory impact assessments should always be conducted alongside policy proposals in order to clearly identify how an intervention will benefit the target group of consumers, and (3) a clear monitoring and evaluation framework is in place to assess the effectiveness of interventions once they have been implemented, including potential unintended knock-on impacts.

**Changing Future of Regulation – Priority 5:**

The implementation of the Code was a missed opportunity for the regulator to avoid a one-size-fits-all approach. Tailoring obligations to ensure their effectiveness and positive impact to the right customer categories would be highly valuable for the whole sector in the future. We would invite ComReg to first review the effectiveness of existing legislation before creating new legislation, and to ensure any policy is technologic neutral and proportionate with the aim of simplification.

**Network Demand, Security, and Resilience:**

Network security and resilience are key priorities to ensure our customers maintain a high level of trust in our network. We urge ComReg to maintain simplicity and harmonisation in all measures it decides to implement in this area, notably in ensuring harmonisation with the requirements of the NIS2 Directive and accompanying Implementing Acts. We submit that ComReg take both a risk-based and collaborative approach to assessing security and resilience of in-scope entities.



ComReg should acknowledge that different entities will already have significant security programmes in place that suit their operational set-up, and that those policies may be global to try and cover multiple competing regulatory regimes. This is particularly true given the nature of the entities that choose Ireland as their main establishment. ComReg should embrace interoperability and appreciate that certain security measures and/or documentation are effectively equivalent to avoid introducing unnecessary regulatory burden. In particular we would strongly urge ComReg to take a mutual recognition approach for audits i.e., entities should be able to submit such global-level audit evidence as proof of compliance as they achieve the same overall outcome as individual national audits. In light of the late transposition of the NIS2 Directive and Article 40 of the EEC, ComReg should allow reasonable time for operators to review, understand, and work against compliance against the eventual Regulations and guidance.

## **Conclusion**

ALTO remains concerned that modifications to ComReg's remit both locally and at a European level may mean that incumbent networks see an opportunity to throttle competition and utilise a changed focus to asset sweat, entrench and behave in a manner that could result in market failures.

We remain singularly and solely focussed on a vibrant and competitive market that can thrive and support competition at the consumer, business and wholesale level in a fair and reasonable manner. We are also focussed on working with ComReg to '*get the job done*' and indeed make sure that communications networks and services are robust and maintained such was the experience during the Covid-19 pandemic and more severe weather events.

The communications industry is one of the unsung heroes of the State, working away often below the line and supporting the entirety of the consumer, wholesale, high-tech and financial markets that require and demand competitive, efficient, effective

and ultra highspeed services. ALTO includes ComReg in that positive remark for sometimes taking the heat and at other times assisting to lead for positive developments for Ireland Inc. We believe that with some small changes to the Strategy Statement 2025 – 2027 and some tweaks to the areas set out above, that the Strategy Statement will be a more meaningful document for industry and for ComReg.

**ALTO**

**14<sup>th</sup> February 2025**

# BT Ireland



# BT Ireland response to Consultation – ComReg 24/103R

Issue 1 – 13 February 2025

We welcome this opportunity to comment on ComReg’s Strategy Statement for 2025-2027.

BT Ireland is pleased to be responding to this important Consultation. We believe that strategy statements are a crucial tool for ComReg to share their plans and direction in a transparent and clear manner, while fostering engagement with the industry and regulatory predictability. We would like to observe that it was a very well-written document.

We appreciate that the coming years will likely expand ComReg’s remit on areas that have not traditionally been within their functions. This was particularly outlined in a clear and detailed manner in the draft Statement. We note that, similarly, due to the entry into force of legislations and EU instruments, our obligations are increasing either directly or indirectly as our partners are contractually passing down obligations unto us. For example, under the DORA regulation, financial institutions are passing down obligations to their providers.

In light of these developments, we are looking forward to continuing engaging with ComReg over their traditional functions and their new roles.

Regarding interaction with stakeholders, it has been our experience that we receive a stream of statutory and informal requests during the holiday period. Whilst consultations, decisions, routine data requests are highlighted and scheduled in your action plan, both the statutory and the informal requests can be unexpected. It can



become difficult to manage resources accordingly with little notice to address these requests. We would therefore ask ComReg to improve its central function to put better management on the timing of some of these asks, especially during periods where resources are limited (*i.e.* key holiday period). Additionally, it is worth noting that other bodies are also issuing key consultations or requests at the same time.

We welcome the comments made by ComReg in the draft Statement concerning the *White Paper on How to master Europe's digital infrastructure needs*<sup>1</sup>, and support that ComReg is chairing BEREC as this is an important period for the development of the vision for the Irish and European telecom industry. A strategy Statement would be a particular pertinent document to provide such observations and direction, which we believe would help promote regulatory certainty and improved investment certainty.

We thank you for your time and consideration in reading our comments.

We are available to discuss the matter further and we are looking forward to continuing working with ComReg.

BT Ireland

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<sup>1</sup> European Commission. How to master Europe's digital infrastructure needs? European Commission, 2024. P16 White Paper - How to master Europe's digital infrastructure needs? | Shaping Europe's digital future (europa.eu)

**eir**

eir's Response to ComReg Strategy Statement - Public Consultation

ComReg Document: ComReg 24/103



14 February 2025

## DOCUMENT CONTROL

<b>Document name</b>	eir response to ComReg Consultation 24/103
<b>Document Owner</b>	eir
<b>Status</b>	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 Response

eir notes ComReg's strategy statement and welcomes the simplified format introduced. We also note that more granular information on ComReg's activities will be available as part of ComReg's annual action plan. With regard to the annual action plan, we believe it should be maintained on a rolling 12 month basis rather than for a static 12 month period. Adopting a more flexible approach would give stakeholders better visibility of ComReg projects. For example, stakeholders currently have no visibility of ComReg's activities in Q3 of each year, which is the first quarter in ComReg's working year, until the plan for that year is published at the start of the working year. Maintaining a rolling action plan would facilitate stakeholder resource planning in order to allow them to engage more effectively with ComReg and its consultation processes.

In line with the Draghi Report recommendations on simplification in terms of the regulatory burden placed on Industry, eir suggests a workstream should be included in ComReg's annual action plan that would seek to amalgamate, condense and streamline existing and upcoming regulatory reporting and approval requirements, to include ad hoc requests submitted by the Regulator to service providers. eir proposes that the latter (ad hoc requests) be especially considered from a scale and frequency perspective and particularly in cases where information is already available to ComReg through internal engagement or by other means.

This need is becoming increasingly urgent in the context of the upcoming European Accessibility Act, the Data Act, NIS2, the CER Directive and the AI Act. eir agrees that these measures are positive for Europe, but highlights that reporting clarity, coherence, alignment and simplification is critical. The regulatory burden should not impact innovation or investment; many multiple overlapping reporting requirements with an inconsistent definitions base has the potential to do just that.

It is suggested that this workstream should engage collaboratively with Industry. It is suggested that ComReg describe reporting/approval/ad hoc request objectives and means in short, simple, achievable terms, that reporting and information requirements are coordinated logically with other information flow requests and that an explicit objective on minimising the administrative burden be included.

eir acknowledges that ComReg's remit will likely expand significantly during the next strategy period and that the need for organisational development is recognised in the proposed strategy statement. With regard to NIS2, the 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.

**SIRO**

# SIRO response to ComReg Consultation 24/103

## Contents

<b>Introduction .....</b>	<b>3</b>
1. Lack of Explicit Provisions for Supporting New Entrants.....	3
2. Weak Approach to Regulating Dominant Operators .....	3
3. Insufficient Commitments to Wholesale Market Competition .....	4
<b>Maintaining Regulatory Focus on WLA and Competitive Market Entrants Amidst Expanding Responsibilities.....</b>	<b>5</b>
1. ComReg Must Maintain Focus on protecting New Entrant WLA Providers and promoting VHCNs .....	5
2. Risks of ComReg's Expanding Responsibilities Consuming Resources & Focus .....	6
3. Recommendations: Balancing New Responsibilities Without Sacrificing Connectivity.....	7
<b>Critique of ComReg's Vision: Lack of Prioritisation on National Connectivity Strategy .....</b>	<b>8</b>
Key Deficiencies in ComReg's Vision .....	8
Proposed Alternative Vision: Connectivity-First, Competition-Driven .....	8
<b>Critique of ComReg's Values &amp; Recommendations for Improvement .....</b>	<b>10</b>
1. Integrity – Too General, Needs a Stronger Pro-Consumer Commitment .....	10
2. Impartiality – Needs to Address Regulatory Capture & Competitive Fairness.....	10
3. Effectiveness – Lacks a Clear Definition of Proactive Market Intervention.....	10
4. Excellence – Too Internal-Focused, Should Prioritise Industry Leadership .....	11
5. Transparency – Needs a Focus on Market Accountability .....	11
<b>Critique of ComReg's Hypothesis in Section 4: A Changing Environment .....</b>	<b>13</b>
1. ComReg's Passive Role as an Observer Rather Than a Market Shaper .....	13
2. Failure to Leverage Regulatory Powers to Drive Competitive Market Outcomes .....	13
3. Missed Opportunities for Market-Defining Interventions .....	14
4. Alternative Hypothesis: A Proactive, Regulatory-First Approach .....	14
<b>Critique of Strategic Priority 1: Connectivity, Competition, and Investment .....</b>	<b>16</b>
<b>Critique of Strategic Priority 2 – Consumer Protection and Empowerment .....</b>	<b>18</b>
<b>Critique of Strategic Priority 5 – Our Organisation .....</b>	<b>21</b>
<b>Conclusion .....</b>	<b>24</b>

## Introduction

SIRO welcomes the opportunity to respond to ComReg's consultation on its Strategy Statement for 2025-2027 as set out in ComReg 24/103. This consultation represents a critical step in ensuring that Ireland's telecommunications sector remains competitive, transparent, and well-regulated to deliver high-quality services to consumers, businesses, and end-users across the country.

Although generally positive towards the direction of the Strategy Statement SIRO has some general concerns which might be addressed in the final iteration of the document, including:

### 1. Lack of Explicit Provisions for Supporting New Entrants

ComReg 24/103R does not contain strong commitments to fostering the entry and growth of new competitors in the FTTH and Wholesale Local Access (WLA) markets. While it acknowledges increasing competition, the document primarily focuses on monitoring deregulated markets rather than actively ensuring new players can compete effectively.

- **Absence of Dedicated New Entrant Policies:** Unlike some European regulatory bodies that introduce targeted measures such as subsidised deployment support, and reduced administrative barriers for smaller providers, ComReg does not outline a proactive plan for enabling challenger ISPs to scale.
- **Heavy Reliance on Market Forces:** The strategy emphasises a "prudent application of regulation where warranted" and removing regulation where possible. However, this assumes that deregulated markets remain competitive, which is often not the case given the incumbent's scale advantages.
- **Limited Spectrum of Remedies:** ComReg relies on a mix of ex ante (preventative) and ex post (reactive) regulation, but it has not proposed more innovative mechanisms such as regulated dark fibre access at cost-based pricing, which could enable alternative providers to expand.

### 2. Weak Approach to Regulating Dominant Operators

The document lacks a strong stance on maintaining regulatory pressure on Eircom, which continues to wield significant influence in the FTTH space due to its extensive legacy infrastructure.

- **Deregulation in the Presence of Market Concentration:** While ComReg acknowledges that "markets remain highly concentrated," it does not introduce adequate additional regulatory guardrails to mitigate dominance risks post regulatory lessening.
- **No Mention of Functional Separation:** Many European regulators have enforced stricter functional separation rules on incumbents to ensure non-discriminatory access. ComReg does not propose stricter oversight of Open Eir's wholesale pricing and service levels, which could be leveraged against alternative operators, and downstream non-integrated retailers.
- **No Mention of Actively Delivering Copper Switch Off:** ComReg's 2025-2027 Strategy Statement critically lacks a clear, actionable plan for driving copper switch-off, a fundamental step in accelerating Ireland's transition to a full-fibre future. The continued operation of legacy copper networks diverts investment from FTTH deployment, increases operational inefficiencies, and prolongs consumer reliance on outdated infrastructure. While other European regulators, such as Ofcom, have set clear timelines and regulatory frameworks to facilitate migration to fibre, ComReg's strategy fails to outline any concrete measures to incentivise or mandate copper switch-off, leaving Ireland at risk of a prolonged and fragmented transition. Without stronger regulatory intervention, clear consumer migration pathways, and enforceable sunset dates, the country risks delayed fibre adoption, increased costs, and continued market dominance by

Eircom, which benefits from maintaining its legacy infrastructure while selectively rolling out fibre in the most profitable areas.

- **Limited Provisions on Pricing and Non-Discriminatory Access:** The document lacks detailed mechanisms to prevent anti-competitive pricing by dominant firms, such as strict cost-based pricing models for wholesale fibre access.

### 3. Insufficient Commitments to Wholesale Market Competition

Wholesale access regulation is critical for promoting retail competition, yet ComReg's strategy does not provide enough clarity on how it will ensure fair access to essential FTTH infrastructure.

- **Failure to Address Dark Fibre Unbundling & Wholesale Access Pricing:** Unlike Ofcom in the UK, which has clear cost-based access models for Openreach's fibre networks, ComReg's document does not provide a detailed approach to ensure fair regulated access to Dark Fiber and wholesale pricing for smaller ISPs.
- **No Commitment to Expanding Open Access Infrastructure:** While ComReg acknowledges the role of the National Broadband Plan (NBP), it does not discuss how open-access infrastructure can be extended to commercially viable areas, where incumbents currently dominate, including requiring the introduction of symmetric open-access fiber regulation in new developments.
- **Failure to Commit to its Market Review decisions:** ComReg should ensure that the recent Wholesale Local Access (WLA) decision remains in force for the full market review cycle to provide regulatory stability, investment certainty, and a predictable competitive landscape. FTTH investors—both incumbents and new entrants—require long-term regulatory clarity to justify capital-intensive network rollouts, and any premature or interim review could create uncertainty, potentially delaying deployment and undermining competitive momentum. Moreover, an interim review risks opening the door to dominant players lobbying for weakened obligations, which could disrupt competitive access to essential infrastructure and hinder the development of alternative networks. Stability in the WLA framework is crucial to ensure challenger network builders can compete fairly, drive retail competition, and maintain downward pressure on prices, ultimately benefiting consumers and accelerating Ireland's transition to a robust, high-speed digital future.

### Conclusion

ComReg 24/103R lacks a robust pro-new entrant strategy and does not go far enough in maintaining pressure on dominant operators in the WLA markets. A more interventionist regulatory stance—including stricter ex ante obligations, cost-based wholesale access models, and measures to prevent predatory pricing—is needed to foster sustainable competition and ensure that new entrants can challenge the incumbent effectively.

## Maintaining Regulatory Focus on WLA and Competitive Market Entrants Amidst Expanding Responsibilities

ComReg is facing a major expansion of its regulatory scope with the arrival of new responsibilities under the NIS2 Directive, the Critical Entities Resilience (CER) Directive, and the AI Act. These frameworks introduce critical obligations related to cybersecurity, infrastructure resilience, and AI governance, which will demand significant resources, expertise, and strategic attention. However, this regulatory shift risks diverting focus away from the urgent and ongoing need to protect new entrant Wholesale Local Access (WLA) providers and promote Very High Capacity Networks (VHCNs), both of which are fundamental to Ireland's digital and economic future.

### 1. ComReg Must Maintain Focus on protecting New Entrant WLA Providers and promoting VHCNs

#### 1.1. Ensuring Competitive FTTH and Broadband Markets

- New entrant WLA providers play a critical role in breaking the stranglehold of incumbent operators like Eircom, fostering price competition and service innovation.
- If ComReg shifts focus away from access regulation, dominant players could tighten their grip on the market through exclusionary practices, such as:
  - Margin Squeezes: Setting wholesale FTTH prices at a level that makes it unprofitable for smaller ISPs to compete.
  - Discriminatory Access: Prioritising their own retail divisions over independent WLA providers.
  - Strategic Deployment Delays: Using their market position to slow new entrants' rollout of VHCNs.
  - Abuse of Promotion Pricing Mechanism

#### 1.2. Achieving Ireland's Digital Connectivity Ambitions

- Ireland's Digital Connectivity Strategy and the National Broadband Plan (NBP) aim for universal gigabit broadband coverage by 2028 and comprehensive 5G availability by 2030.
- The success of these initiatives depends on a healthy, competitive telecoms ecosystem—not just one dominant player.
- A strong regulatory stance on WLA access, open competition, and fair pricing will ensure that the broadband market does not regress into a monopolistic structure as FTTH becomes the primary infrastructure.
- Driving Copper Switch-Off is essential to deliver on the promise of the National Connectivity Strategy and should be central to ComReg's ambitions over the course of the next 3 years.

#### 1.3. Avoiding Regulatory Capture & Market Failures

- If ComReg deprioritises competitive safeguards in WLA and VHCNs, there is a risk that:
  - Market consolidation accelerates, limiting consumer choice.
  - Investment slows in underserved areas, as the incumbent cherry-picks the most profitable regions.

- Regulatory capture increases, where dominant players exert undue influence over policy direction.

## 2. Risks of ComReg's Expanding Responsibilities Consuming Resources & Focus

### 2.1. The Scale of the NIS2, CER, and AI Act Workload

- NIS2 Directive: Requires ComReg to enhance cybersecurity oversight of telecom networks, enforce compliance with security frameworks, and coordinate with EU bodies.
- CER Directive: Mandates resilience planning for critical communications infrastructure, including ensuring operational continuity in extreme scenarios (cyberattacks, natural disasters, geopolitical risks).
- AI Act: Expands ComReg's remit into the oversight of AI-driven services in telecommunications, such as automated network management and fraud detection.

Each of these requires new staffing, technical expertise, and regulatory enforcement mechanisms, potentially leading to:

- Regulatory overstretch: ComReg may struggle to maintain effective oversight across all its areas of responsibility.
- Talent diversion: Skilled personnel and leadership focus may shift from telecom market regulation to security and AI compliance.
- Budget constraints: Resources that could be invested in improving market access, competitive pricing, and infrastructure deployment could be redirected to compliance-focused activities.

### 2.2. How This Could Undermine Connectivity Priorities

If ComReg becomes too focused on the 'new' cybersecurity, resilience, and AI governance at the expense of connectivity and competition, the following risks emerge:

#### 1. Weakening of Pro-Competition Telecom Regulation

- Without active oversight, dominant operators could set restrictive conditions on wholesale FTTH access.
- Fewer regulatory interventions would lead to barriers for alternative networks (e.g., limited duct and pole access, restrictive pricing).

#### 2. Delays in Achieving Ireland's Connectivity Goals

- If ComReg fails to enforce fair market conditions, new entrants will struggle, leading to:
  - Slower urban blackspot broadband expansion (as private investment is deterred).
  - Higher consumer prices (due to reduced competition).
  - Lower innovation levels (as alternative ISPs provide fewer services).

#### 3. Reduced International Competitiveness

- Ireland has positioned itself as a European leader in digital connectivity and technology investment.
- However, if ComReg deprioritises network expansion and fair market conditions, Ireland's ability to compete with leading digital economies (e.g., Germany, the UK, the Nordics) may decline.



### 3. Recommendations: Balancing New Responsibilities Without Sacrificing Connectivity

#### 3.1. Ringfence Resources for Telecom Competition Regulation

- Maintain and invest in the dedicated Wholesale division focused principally on WLA, VHCN promotion, and broadband competition.
- Separate financial and human resources for new cybersecurity and AI mandates so they do not cannibalise telecom oversight.

#### 3.2. Strengthen Market Safeguards Amidst Regulatory Changes

- Reinforce ex ante (preventative) measures to ensure prudent WLA pricing and promotions obligations on OpenEir and open-access FTTH networks.
- Ensure current WLA determination remains in place for full duration of market review cycle.
- Mandate Open Eir to provide even more transparent wholesale pricing and promotion models for more detailed transparency regarding potential margin squeeze.
- Introduce stricter monitoring of FTTH rollout, ensuring OpenEir do not delay/accelerate deployment in geographic areas designed to limit competition.

#### 3.3. Ensure Regulatory Accountability

- Require annual impact assessments to track whether new responsibilities (NIS2, CER, AI Act) are compromising wholesale telecom competition oversight efforts.
- Engage independent oversight bodies to evaluate ComReg's effectiveness in balancing security obligations with digital connectivity priorities.

### Conclusion

The expansion of ComReg's mandate to include cybersecurity, resilience, and AI oversight is undoubtedly important. However, if it diverts resources and focus away from competition regulation and broadband expansion, the consequences will be higher prices, weaker competition, and slower connectivity improvements for Irish consumers and businesses.

To mitigate this, ComReg must ringfence resources for telecom competition oversight, strengthen market access protections, and ensure accountability so that connectivity remains a top national priority, even as its regulatory role broadens.

## Critique of ComReg's Vision: Lack of Prioritisation on National Connectivity Strategy

ComReg's vision, as articulated in its 2025-2027 Strategy Statement, aims to position itself as an "innovative, expert regulator" that promotes competition, consumer protection, compliance, and efficient spectrum management. However, this vision fails to explicitly prioritise the delivery of Ireland's National Connectivity Strategy, which is fundamental to the country's economic and digital future.

### Key Deficiencies in ComReg's Vision

#### 1. Lack of Clear Commitment to National Connectivity Goals

- The Digital Connectivity Strategy for Ireland (2022-2028) sets ambitious targets, including gigabit broadband for all premises by 2028 and 5G coverage for all populated areas by 2030.
- ComReg's vision does not explicitly align with these targets, nor does it define its role as the lead enabler of these objectives.
- Instead, it takes a passive stance, focusing on market oversight and regulatory compliance, rather than actively driving investment and infrastructure expansion.

#### 2. Absence of a Pro-Investment, Pro-Competition Stance

- While ComReg acknowledges the need to foster competition, its vision lacks a proactive commitment to facilitating very high capacity network (VHCN) rollouts or ensuring fair market conditions for new entrants.
- Without a clear mandate to accelerate investment and competition, Ireland risks a market dominated by incumbents, where FTTH and 5G deployment proceed at suboptimal speed and coverage.

#### 3. Disproportionate Focus on Emerging Regulatory Areas (AI, Cybersecurity, CER) Over Core Connectivity Mandates

- ComReg's expanding responsibilities under NIS2, CER, and the AI Act risk diverting resources and leadership attention away from telecom infrastructure and market regulation.
- The absence of a strong connectivity-first commitment in the vision suggests that network expansion and affordability may take a backseat to 'novel' security and compliance frameworks, stalling Ireland's digital connectivity ambitions.

### Proposed Alternative Vision: Connectivity-First, Competition-Driven

"ComReg will be the driving force behind Ireland's digital future by ensuring universal, affordable, and high-quality connectivity. Through proactive regulation, we will enable investment in Very High Capacity Networks (VHCNs), promote open competition, and remove barriers to full-fibre and 5G deployment. Our goal is to accelerate the rollout of next-generation infrastructure, ensuring Ireland is a leader in digital connectivity, innovation, and economic competitiveness."

#### Why This Alternative Vision is Stronger

- **Connectivity-First Approach** → Establishes ComReg's leadership in national broadband and 5G expansion, aligning with Ireland's Digital Connectivity Strategy.

- **Proactive Market Shaping** → Moves from passive oversight to active market facilitation, encouraging investment, fair competition, and open access models.
- **Balanced Prioritisation** → While cybersecurity, AI, and resilience are important, this vision ensures that telecom infrastructure and competition remain the foundation of ComReg's strategic focus.

## Conclusion

ComReg's current vision is too general and regulatory-focused, failing to place connectivity and digital infrastructure at the heart of its mission. The proposed alternative vision prioritises national broadband and 5G deployment, ensures a competitive market, and reinforces ComReg's role as a proactive enabler of Ireland's digital future.

## Critique of ComReg's Values & Recommendations for Improvement

ComReg's stated values—Integrity, Impartiality, Effectiveness, Excellence, and Transparency—reflect a passive, compliance-focused approach rather than an active, outcome-driven regulatory stance. While these values emphasise ethical and professional standards, they fail to explicitly commit to proactive market shaping, investment enablement, and consumer-centric network development.

Below is a detailed critique of each value and recommendations for improvement:

### 1. Integrity – Too General, Needs a Stronger Pro-Consumer Commitment

Current Definition: "We act with honesty and respect and adhere to the highest ethical and professional standards."

Critique:

- Integrity should not just mean compliance with ethical standards—it should mean standing up for competitive network/service providers and new entrants against anti-competitive behaviour.
- There is no explicit reference to competition advocacy, despite ComReg's role in ensuring fair pricing, quality of service, and competitive broadband markets.
- Integrity should extend to actively ensuring that dominant players do not use regulatory complexity to their advantage.

Improved Value:

Consumer-Centric Integrity – "We act with honesty, fairness, and unwavering commitment to ensuring competitive, high-quality, and affordable connectivity for all users."

### 2. Impartiality – Needs to Address Regulatory Capture & Competitive Fairness

Current Definition: "Our actions are evidence-based, objective, independent, non-discriminatory, and accessible."

Critique:

- While impartiality is critical, it should be explicitly framed around preventing regulatory capture by dominant market players.
- Regulatory neutrality is not enough—ComReg should commit to actively levelling the playing field for new entrants and challenger networks.
- The principle of impartiality should also acknowledge the risks of incumbents exploiting legacy advantages (e.g., Open Eir's duct and pole access, wholesale pricing controls).

Improved Value:

Pro-Competition Impartiality – "We ensure fair, evidence-based, and independent regulation that prevents market distortion, fosters investment, and protects smaller competitors from anti-competitive practices."

### 3. Effectiveness – Lacks a Clear Definition of Proactive Market Intervention

Current Definition: "We successfully deliver our objectives in a dynamic environment."

Critique:

- Effectiveness is currently vague and lacks measurable ambition—there is no indication of what success looks like.
- It does not hold ComReg accountable for delivering specific, tangible connectivity outcomes (e.g., faster VHCN rollout, lower broadband prices, improved rural access).
- The wording suggests regulatory process efficiency rather than actual sectoral improvements.

Improved Value:

Outcome-Driven Effectiveness – “We measure success by our ability to accelerate broadband expansion, improve service affordability, and maintain a fair, competitive market that drives investment and innovation.”

## 4. Excellence – Too Internal-Focused, Should Prioritise Industry Leadership

Current Definition: “We are always striving to achieve the highest standards.”

Critique:

- Excellence should not be just an internal operational standard—it should extend to ComReg’s leadership role in driving best-in-class broadband and digital connectivity regulation.
- ComReg should commit to leading the EU in regulatory best practices for full fibre, 5G, and competitive broadband markets, ensuring that Ireland is ahead of connectivity targets.
- The principle should emphasise continuous learning from global regulatory success stories (e.g., Ofcom’s dark fibre strategy, ARCEP’s proactive fibre-sharing mandates in France).

Improved Value:

Industry-Leading Excellence – “We set the standard for world-class broadband regulation, ensuring Ireland is a leader in fibre, 5G, and digital competition policy.”

## 5. Transparency – Needs a Focus on Market Accountability

Current Definition: “We ensure trust and confidence by being clear and open in the work we do.”

Critique:

- Transparency should not just be about regulatory decisions—it should be about making market dynamics more visible and holding dominant operators accountable.
- ComReg should commit to publicly tracking and reporting on FTTH and 5G deployment progress, compliance failures, and wholesale pricing trends.
- There should be a specific focus on providing real-time consumer insights on broadband pricing, service quality, and investment progress.

Improved Value:

Market Accountability Transparency – “We ensure open and accessible broadband market data, holding all stakeholders—regulators, operators, and policymakers—accountable for delivering Ireland’s digital future.”

Conclusion: A Shift from Passive Governance to Active Market Leadership

Key Takeaways from the Critique:

- ComReg’s current values are passive and compliance-oriented, rather than outcome-driven and competitive-market-focused.
- The lack of direct references to competition, investment, and connectivity outcomes weakens its regulatory stance.
- A stronger, more active values framework would ensure that ComReg is not just a neutral observer but an active force in shaping Ireland’s digital future.

By redefining its values along these lines, ComReg can better align with Ireland’s Digital Connectivity Strategy, enhance its role as a pro-investment regulator, and ensure that broadband markets remain competitive, affordable, and world-class.

## Critique of ComReg's Hypothesis in Section 4: A Changing Environment

In Section 4 of ComReg's 2025-2027 Strategy Statement, the regulator discusses the evolving telecoms landscape, highlighting market transitions, new regulatory responsibilities, and technological shifts. However, its approach appears overly passive, prioritising monitoring and adaptation rather than active market intervention to mitigate risks—particularly those posed by dominant players like Eircom in the Wholesale Local Access (WLA) concerning Very High Capacity Networks (VHCN).

### 1. ComReg's Passive Role as an Observer Rather Than a Market Shaper

#### 1.1. Lack of Proactive Action Against Market Failures

- The document discusses market changes as something to be observed and adapted to, rather than an opportunity for ComReg to proactively shape the market structure to ensure fair competition.
- Instead of detailing regulatory interventions to address dominant market positions, ComReg takes a reactive stance, suggesting it will adjust to trends rather than lead them.
- This ignores its statutory obligation to prevent market concentration from eroding competition, particularly in FTTH and WLA services.

#### 1.2. Insufficient Recognition of the Risks Posed by Eircom's Market Power

- Eircom continues to hold a dominant position in legacy copper networks and is extending that dominance into fibre-based WLA.
- ComReg acknowledges "competition is evolving" but fails to explicitly identify or address Eircom's long-standing ability to suppress competition through pricing strategies, network access control, and slow FTTH rollout.
- Without specific countermeasures such as stricter cost-based access pricing or structural separation of wholesale and retail divisions, ComReg's passive stance could lead to a re-monopolisation of broadband services under fibre infrastructure.

### 2. Failure to Leverage Regulatory Powers to Drive Competitive Market Outcomes

#### 2.1. No Clear Strategy for Ex Ante Regulation to Prevent Anti-Competitive Behaviour

- While ComReg mentions monitoring deregulated markets, it does not set out a clear strategy for reintroducing regulation specifically to target the risk of bad actor behaviour on the part of the incumbent.
- It does not commit to applying strong ex ante remedies (such as regulated dark fibre access or further deeper wholesale pricing oversight) to prevent Eircom from leveraging its scale to block smaller competitors.
- In contrast, regulators like Ofcom (UK) and ARCEP (France) actively impose rules to keep dominant players in check, ensuring network access is available on fair and non-discriminatory terms, in a manner that does not foreclose the emergence of competitor networks.

#### 2.2. No Concrete Plans to Accelerate VHCN Deployment and Competition

- The Digital Connectivity Strategy for Ireland sets ambitious goals for full gigabit broadband coverage by 2028, yet ComReg fails to present itself as a primary enabler of this goal.

- ComReg should be actively pushing for infrastructure sharing, competitive access conditions, and targeted regulatory interventions to ensure that alternative operators can scale.
- Instead, it frames market evolution as something it will react to, rather than something it has a responsibility to shape and improve.

### 3. Missed Opportunities for Market-Defining Interventions

#### 3.1. No Stronger Regulatory Approach to Wholesale FTTH Access

- ComReg does not acknowledge the necessity for stronger oversight on Eircom's wholesale fibre pricing and promotional strategies.
- There is no mention of strengthening quality (backed by impactful SLAs) passive infrastructure access (ducts & poles) to reduce barriers for new entrants, despite this being a known challenge.
- ComReg should be ensuring a longer horizon cost-based, non-discriminatory access model for alternative providers, yet the strategy fails to address how it will ensure this.

#### 3.2. Weak Commitment to Consumer Protection from Market Concentration

- Broadband affordability and service quality are directly linked to the level of market competition, yet ComReg does not outline a robust approach to ensuring competitive pricing and high service standards.
- Without strong competition policies, Ireland risks a future where broadband pricing becomes as problematic as energy pricing, with dominant players able to dictate terms.
- The clear leveraging of the vertical integration of Eircom to drive FTTH takeup on their network is arguably competition distortive impacting negative on competitive operators.

### 4. Alternative Hypothesis: A Proactive, Regulatory-First Approach

A More Active Stance ComReg Should Take:

Instead of passively observing market trends, ComReg should:

- Explicitly recognise the threat of dominant operators entrenching their market power and set clear intervention triggers.
- Commit to enforcing fair wholesale pricing for new entrants and strict infrastructure-sharing rules to level the playing field.
- Set out ex ante regulatory tools that will be applied if competition falters—e.g., dark fibre mandates, deeper pricing transparency obligations, and stricter functional separation.
- Ensure FTTH expansion aligns with Ireland's digital strategy by driving proactive investment incentives and infrastructure access reforms.

#### Alternative Framing for Section 4: A Regulatory-Driven Future

Instead of stating that ComReg is adapting to a changing environment, the section should be rewritten to position ComReg as an active driver of Ireland's connectivity future, ensuring fair competition, investment acceleration, and market diversity.

Proposed Revision:

*"As Ireland transitions to a fibre-first, high-capacity network future, ComReg will take an active regulatory role to ensure competition, affordability, and rapid deployment. We will enforce fair access to dominant wholesale networks, regulate FTTH pricing where necessary, and take pre-emptive action to prevent dominant players from stifling market competition. Our role is not just to observe the market but to ensure*



*it delivers consumer benefits and economic growth through dynamic competition and investment-led growth."*

#### Conclusion: ComReg Must Shift from Observer to Market Shaper

ComReg's current approach in Section 4 is overly reactive, failing to address structural risks in the telecom market. Without stronger intervention strategies, Ireland risks a future where Eircom can dictate pricing and access conditions, slowing the country's broadband ambitions.

A more proactive regulatory vision—one that ensures competitive market conditions, enforces non-discriminatory access, and prioritises national broadband targets over laissez-faire market evolution—is essential for ensuring that Ireland remains a leader in affordable, high-speed digital connectivity.

## Critique of Strategic Priority 1: Connectivity, Competition, and Investment

ComReg's Strategic Priority 1 (Connectivity, Competition, and Investment) aims to promote high-speed network investment and competition while ensuring efficient spectrum management. While this is a fundamental objective, the strategy lacks clarity, actionable commitments, and strong regulatory interventions necessary to foster a genuinely competitive FTTH and VHCN market.

### 1. Key Problems with Strategic Priority 1

#### 1.1. Weak Proactive Measures to Accelerate FTTH and VHCN Deployment

- ComReg states that it will “use the tools at its disposal to help achieve the digital connectivity targets” but does not specify how it will actively drive investment to meet Ireland’s 2028 gigabit broadband goal.
- There is no reference to removing barriers for new entrants, such as:
  - Faster access to ducts and poles.
  - More aggressive price regulation of Eircom’s wholesale access.
  - Incentives for alternative network providers (altnets) to expand in underserved areas.
- ComReg relies too much on commercial investment without strong regulatory safeguards, assuming that the market will self-correct, which is a high-risk approach given Eircom’s dominant position.

#### 1.2. No Commitment to Structural Market Reforms for Competition

- ComReg acknowledges the need for “effective and sustainable competition”, yet it also promotes deregulation where possible.
- This suggests a preference for light-touch regulation, which could entrench Eircom’s dominance rather than fostering real market contestability.
- Unlike Ofcom (UK), which intervenes to prevent BT Openreach from stifling competition, ComReg does not propose similar functional separation or deeper pricing interventions on Open Eir’s wholesale business.

#### 1.3. Over-Reliance on Market Forces Instead of Regulatory Levers

- The strategy states that ComReg will “promote efficient commercial investment” by providing regulatory certainty and competitive incentives, but it does not explain:
  - How it will prevent predatory pricing by dominant operators.
  - How it will ensure smaller ISPs can access wholesale fibre at fair rates.
  - Whether it will introduce symmetric regulation (i.e., all infrastructure providers must offer fair access terms).
- There is no commitment to cost-based wholesale pricing for FTTH, which could limit competition if Open Eir charges excessive fees for network access.

#### 1.4. No Specific Targets or Accountability Mechanisms

- The goals under this strategic priority lack measurable benchmarks.
- ComReg should be setting clear metrics for competitive broadband pricing, FTTH rollout rates, and new entrant market share to track progress.

- Without quantifiable targets, there is no way to measure whether ComReg's strategy is succeeding or if regulatory action is required.

## 2. How Strategic Priority 1 Could Be Improved

### 2.1. Shift from Passive Oversight to Active Market-Shaping

- Introduce clear intervention triggers: If FTTH pricing exceeds certain thresholds or alternative networks struggle to gain a market foothold, ComReg should have a predefined mechanism to intervene.
- Mandate fair wholesale pricing: ComReg should introduce cost-based pricing obligations on Open Eir to prevent wholesale pricing from becoming a barrier to competition.
- Stronger regulation of VHCN infrastructure sharing: Ensure effective open access to Eir ducts, poles, and dark fibre to allow new entrants to scale more effectively.

### 2.2. Strengthen Market Oversight & Competitive Safeguards

- Commit to reintroducing regulation if deregulation leads to market failures. Instead of assuming competition will emerge, ComReg should monitor concentration levels and step in if dominance worsens.
- Require Open Eir to provide full transparency on wholesale service performance (e.g., service delays, pricing differentials, and exclusionary practices).
- Establish a pro-entrant investment fund: Facilitate investment incentives for alternative providers to expand rural FTTH networks and counteract incumbents' scale advantages.

### 2.3. Introduce Concrete, Measurable Targets

Set explicit benchmarks for:

- Minimum FTTH rollout percentages by year.
- Market share distribution among incumbents and altnets.

Publish quarterly competitive impact reports to ensure transparency in how regulatory actions (or lack thereof) are affecting competition and investment.

## 3. Conclusion: ComReg Needs a Stronger, More Targeted Strategy

ComReg's Strategic Priority 1 is too vague, overly reliant on market self-regulation, and lacks concrete action plans to ensure competition in the FTTH and VHCN space. Without clear regulatory interventions, Ireland risks a re-monopolisation of broadband under Eircom's control.

A revised version of Strategic Priority 1 should include:

1. Proactive regulatory levers (cost-based wholesale pricing, stricter infrastructure-sharing rules).
2. Stronger competitive safeguards (commitment to intervene if altnets struggle).
3. Clear, measurable targets to ensure connectivity progress can be objectively assessed.

By taking a more aggressive regulatory stance, ComReg can ensure long-term competition, affordability, and rapid digital infrastructure expansion in Ireland.

## Critique of Strategic Priority 2 – Consumer Protection and Empowerment

ComReg’s Strategic Priority 2 – Consumer Protection and Empowerment aims to advocate for consumers, ensure fair access to information, enforce service provider accountability, and protect vulnerable users. While these are laudable goals, the approach risks being overly burdensome on operators, potentially discouraging market participation and reducing incentives for retail competition, which is a natural driver of consumer benefits.

### 1. Key Issues with ComReg’s Consumer Protection Approach

#### 1.1. Overly Prescriptive Regulations May Discourage Market Participation

- ComReg aims to proactively enforce consumer rights, require timely redress mechanisms, and advocate for regulatory interventions where consumer harm is identified.
- However, excessive consumer protection measures can increase compliance costs for operators, which may lead to:
  - Reduced investment in network expansion due to financial and operational strain.
  - Smaller ISPs exiting the market, leading to reduced retail competition.
  - Higher broadband prices, as compliance costs get passed on to consumers.

Example from the UK: Ofcom introduced automatic broadband compensation rules, which led to some smaller ISPs struggling to comply due to increased operational costs. ComReg should carefully assess whether similar interventions in Ireland would undermine competition by placing undue burdens on providers.

#### 1.2. Lack of Emphasis on Retail Competition as a Natural Consumer Protection Mechanism

- Retail competition is the best form of consumer protection—when multiple providers compete, they naturally enhance service quality, reduce prices, and innovate to attract customers.
- ComReg’s strategy focuses on regulatory intervention rather than fostering conditions that enhance market-driven consumer benefits.
- A more balanced approach would emphasise creating a competitive retail landscape where market forces protect consumers, rather than relying excessively on direct regulation.

#### Alternative Approach:

- Encourage greater retail competition through simplified market entry for new ISPs.
- Reduce red tape for challenger brands, allowing alternative providers to scale without excessive regulatory burdens.
- Ensure fair wholesale access so new entrants can compete without facing price squeezes from dominant operators.

#### 1.3. Consumer Regulations Need Periodic Review for Removal, Reduction, or Replacement

- ComReg’s consumer protection framework should not be static—it should be regularly reviewed to assess whether certain measures are outdated, redundant, or overly intrusive.
- Some consumer protection regulations could be counterproductive if they create high compliance costs without delivering proportionate consumer benefits.
- A systematic review process should be introduced, ensuring regulations are:
  - Necessary – Does the regulation serve a clear consumer need that market forces cannot address?
  - Effective – Does the regulation actually improve outcomes, or does it merely add complexity?
  - Proportionate – Does the benefit to consumers outweigh the compliance burden on providers?

Proposed Policy Change: Introduce a Regulatory Sunset Clause, where consumer protection measures are automatically reviewed every 3-5 years to determine whether they should be maintained, amended, or removed.

#### 1.4. Balancing Consumer Rights with Operator Viability

- Ensuring consumer protection is important, but it should not compromise operator sustainability.
- If regulations become too complex or costly, some providers—particularly smaller ISPs—may exit the market, leading to:
  - Reduced service diversity and competition.
  - Higher prices due to decreased competitive pressure.
  - Less innovation in service offerings.
- ComReg must carefully balance consumer rights with ensuring a regulatory environment where operators can thrive and invest.

#### Alternative Policy Approach:

1. Simplify consumer redress mechanisms rather than mandating complex procedures.
2. Allow voluntary industry-led consumer protection schemes, rather than imposing rigid regulations.
3. Ensure compliance measures are scalable, so smaller ISPs are not disproportionately affected compared to large incumbents.

## 2. Recommended Improvements to Strategic Priority 2

### 2.1. Shift from a Heavy-Handed Regulatory Model to a Pro-Competition Approach

- Emphasise market-driven solutions – Let competition drive service quality rather than defaulting to regulatory intervention.
- Focus on enabling more ISPs to enter and scale, rather than overburdening existing players with compliance obligations.
- Monitor retail competition levels – If competition is effective, reduce regulatory interventions instead of maintaining unnecessary oversight.

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### 2.2. Introduce Proportionality in Consumer Regulations

- Apply different regulatory requirements for large vs. small ISPs – A one-size-fits-all approach disproportionately affects new entrants.
- Regularly review consumer protection regulations, removing those that are no longer necessary.
- Ensure regulations do not discourage investment by keeping compliance simple, cost-effective, and fair.

### 2.3. Establish Clear Guidelines for Regulation Removal or Reduction

- Introduce sunset clauses for consumer protection measures—regulations should automatically expire unless renewed after assessment.
- Mandate periodic cost-benefit analyses for existing consumer protections to ensure they deliver net positive outcomes.
- Replace intrusive regulations with industry-led initiatives where possible (e.g., voluntary codes of conduct for customer service standards).

### 3. Conclusion: Towards a Balanced Consumer Protection Strategy

ComReg's Strategic Priority 2 is well-intentioned but risks being overly burdensome on operators, potentially reducing competition and increasing broadband prices.

A refined strategy should:

1. Emphasise retail competition as a consumer protection mechanism, reducing reliance on direct regulatory intervention.
2. Ensure consumer protection rules are proportionate and do not deter market participation.
3. Regularly review regulations to identify those that should be removed, simplified, or replaced with industry-led measures.

By adopting a more balanced approach, ComReg can protect consumers while fostering a competitive, investment-friendly telecom environment that delivers better services at lower prices.

## Critique of Strategic Priority 5 – Our Organisation

ComReg’s Strategic Priority 5 – Our Organisation focuses on resourcing, skills development, sector expertise, and stakeholder engagement. While these are essential components of a well-functioning regulator, the strategy lacks a strong commitment to cost control, financial transparency, and operational efficiency.

A regulator of ComReg’s scale should prioritise efficiency, ensuring that industry levies and charges are not excessive, while maintaining a highly skilled and strategically structured workforce.

### 1. Key Issues with ComReg’s Organisational Strategy

#### 1.1. Lack of Focus on Cost Efficiency and Budget Tightening

- ComReg states it will “resource our organisation to deliver on our mandate” but does not mention cost containment or budget efficiency.
- Given that ComReg is funded via industry levies, it has no direct incentive to reduce costs, leading to potential inefficiencies.
- There is no commitment to regular cost reviews, budget transparency, or finding ways to deliver regulatory effectiveness at a lower cost.

#### Alternative Approach:

1. Introduce an annual cost-efficiency review, identifying areas where resources can be optimised.
2. Set clear cost-reduction targets to ensure ComReg remains financially disciplined.
3. Publicly report on detailed operational spending and efficiency improvements.

#### 1.2. No Commitment to Reducing Industry Levies and Charges

- The strategy fails to address how ComReg will ensure levies and charges remain proportionate and do not become an undue burden on telecom operators.
- As telecom operators face increasing infrastructure investment costs, high regulatory levies act as an indirect tax on competition and innovation.
- Unlike other regulators (e.g., Ofcom UK), ComReg does not outline a plan to reduce its reliance on industry fees.

#### Alternative Approach:

1. Introduce a long-term plan to reduce industry levies, aligning them with actual regulatory costs.
2. Ensure levies are proportionate to operator size and market share, preventing undue pressure on smaller entrants.
3. Commit to financial efficiency so that reduced levies do not compromise regulatory effectiveness.

#### 1.3. Excessive Middle Management and Lack of Strategic Workforce Planning

- ComReg states it will ensure it has the “appropriate skills” through staff training and external recruitment, but it does not address whether its current organisational structure is optimally designed.
- Too many middle management layers can lead to inefficiencies, slow decision-making, and higher salary costs without adding proportional regulatory value.

- Instead of focusing on bureaucracy, ComReg should prioritise remunerating key senior professionals and directors with deep industry expertise.

Alternative Approach:

1. Conduct an organisational review to “right-size” ComReg, reducing non-essential management roles.
2. Shift investment towards industry-leading talent in telecom regulation, economic analysis, and competition policy.
3. Implement a more agile, leaner regulatory structure that prioritises expertise over administrative layers.

#### 1.4. Limited Transparency on Budgeting and Spending

- The strategy does not include any commitment to financial transparency, such as publishing detailed annual breakdowns of expenditures.
- ComReg’s spending should be more publicly accountable, ensuring that every euro spent delivers regulatory value to the industry and consumers.
- Without clear reporting, industry stakeholders cannot assess whether ComReg is operating efficiently or overspending.

Alternative Approach:

1. Publish detailed financial reports on how levies are spent.
2. Introduce independent audits of ComReg’s efficiency, ensuring regulatory spending aligns with industry needs.
3. Benchmark against other European regulators to ensure cost-effectiveness.

## 2. Recommended Improvements to Strategic Priority 5

### 2.1. Shift Focus to Cost Efficiency and Financial Accountability

- Commit to annual cost reviews and efficiency savings.
- Reduce administrative overhead and focus on high-value regulatory work.
- Ensure regulatory levies are reasonable, transparent, and not excessive.

### 2.2. Right-Size the Organisation for Strategic Impact

- Reduce unnecessary middle management roles while investing in high-level expertise.
- Prioritise hiring professionals with deep industry knowledge, rather than expanding bureaucracy.
- Create a leaner, more responsive regulatory body that delivers faster and more effective decisions.

### 2.3. Increase Transparency in Budgeting and Spending

- Publish detailed annual reports on spending and regulatory levies. Introduce an independent review mechanism to assess financial efficiency.
- Ensure industry levies align with actual regulatory costs, preventing excess fees on operators.

## 3. Conclusion: ComReg Must Improve Cost Efficiency and Accountability



- ComReg’s current strategy lacks focus on cost control, levy reduction, and operational efficiency.
- A more disciplined financial approach would reduce regulatory burdens on operators and foster a more competitive market.
- A leaner, expertise-driven workforce would improve regulatory impact without increasing costs.

By right-sizing its organisation, improving budget transparency, and reducing industry levies, ComReg can deliver a high-impact regulatory strategy without excessive costs—ensuring it remains a strong, cost-effective regulator that supports, rather than burdens, market competition.

## Conclusion

ComReg's 2025-2027 Strategy Review presents a rare opportunity to reshape how Ireland's National Connectivity Strategy is fully realised. However, the current strategy lacks the bold, decisive interventions necessary to guarantee a truly competitive market and prevent dominant players from entrenching their power at the expense of consumers and new entrants.

If ComReg aims is only to maintain the status quo, Ireland risks a future where fibre infrastructure is controlled by a few powerful incumbents, innovation is stifled, and consumers face higher prices with limited choice. This must not be allowed to happen. Instead, ComReg should use this strategy review to:

- Aggressively promote the rollout of competitive FTTH infrastructure, ensuring challenger networks can thrive through fair access and investment incentives.
- Implement robust regulatory safeguards to prevent dominant players—particularly Eircom—from abusing their market power through predatory pricing, unfair wholesale practices, or strategic deployment delays.
- Drive a clear, enforceable roadmap to copper switch-off, ensuring a seamless transition to full-fibre networks without delaying competition or consumer choice.
- Fully align its regulatory priorities with the National Connectivity Strategy, taking a proactive role in delivering universal gigabit broadband and nationwide 5G by 2028 and 2030, rather than merely monitoring market trends.

This consultation should serve as a call to action for ComReg to be bolder, more ambitious, and more interventionist where necessary. A passive, market-led approach is insufficient—Ireland needs a regulator that is willing to take decisive action to shape the future, prevent market failures, and ensure a digital infrastructure that serves the entire economy and society.

**Now is the time for ComReg to lead, not follow. The decisions made in this strategy will define Ireland's digital competitiveness for the next decade. Let us ensure they are the right ones.**

# Sky Ireland



# Response to Draft Strategy Statement 2025-2027

ComReg 24/103

14 February 2025

Sky Ireland welcomes the opportunity to respond to ComReg's draft strategy statement for 2025 to 2027.

As ComReg itself notes, its areas of supervision are expanding. Given these additional responsibilities, Sky Ireland believes it is increasingly important for ComReg to adopt a holistic view of all guidance and consultations issued across its various departments that impact the electronic communications sector.

In particular, and in line with the Government's stated commitment within the Programme for Government to publish an Action Plan on competitiveness— which will include initiatives aimed at reducing regulatory burdens—ComReg should be mindful of the current regulatory load facing telecoms providers in Ireland.

As of 2025, broadband and mobile providers are still responding to consultations and implementing various aspects of the EECC. Providers are also awaiting the delayed transposition of NIS 2, which will introduce additional regulatory obligations. Furthermore, telecoms providers are still working to implement the Decisions issued by ComReg to address nuisance communications, and MNOs and MVNOs are awaiting the Government's finalisation of Guidance on implementing a Public Warning System.

While these regulations stem from a combination of the EU, Government, and ComReg itself, they highlight the wide range of obligations that telecoms providers must manage. ComReg should be aware that regulatory requirements—many of which demand significant technical resources to implement—are always prioritised within Sky Ireland. As a result, commercial priorities, including technical innovations and developments that benefit the end user, are often deprioritised.

It would be helpful for ComReg to give an accurate timeline and where possible, bundle all consultations stemming from a piece of legislation into one so that operators can provide tech and network teams a clearer view of expected tech developments. The ability to provide our development teams with a clear and predictable roadmap of the year ahead (or on an even longer-term basis) would have a material benefit on our ability to plan and resource accordingly and to manage competing priorities.

Sky Ireland would also welcome ComReg considering the wholesaler/retailer relationship more frequently when issuing consultations and guidance. Retailers often rely heavily on wholesalers for information to fulfil obligations, as outlined in the Missed Appointments consultation and the Customer Charter consultation.

**- ENDS -**

# Twilio



**Consultation response:  
ComReg Strategy Statement 2025–2027**

14th February 2025  
Submitted via email to: [strategy@comreg.ie](mailto:strategy@comreg.ie)



Dear ComReg team,

Twilio appreciates the opportunity to share our views on ComReg's strategic plans for the years ahead. ComReg plays a crucial role in the European telecoms regulatory landscape, and we welcome the initiatives laid out in your 2025–2027 plan to support the sector and the emergence of new technologies such as Cloud and AI.

Twilio provides electronic communications and digital services in nearly all EU Member States. As a B2B cloud communications company (CPaaS), Twilio, through Twilio Ireland Ltd, empowers businesses and nonprofits of all sizes across Europe to enhance their engagement with their customers and constituents. Leveraging innovative cloud and AI technologies, we support users to meet their connectivity needs, and contribute to the EU's aims of developing a fully connected continent by 2030.

In Ireland, Twilio's contact centre services help Dutch bank ING connect consumers with their advisors to make important financial decisions. Twilio also supports Teleclinic, a German health tech startup providing an on-demand platform for online doctor visits, by connecting doctors with 20% more patients each month through SMS appointment reminders and voice conference call solutions.

Further examples of services enabled by Twilio in Ireland include:

- HSE 2-way communication with patients that have been admitted into hospital where an SMS is sent asking if they are still in hospital;
- Clinics communicate with their patients asking if they want to cancel or reschedule appointments;
- Car rental companies and hotels communicate with their customers sending an SMS to confirm their bookings but also offering support, please reply HELP for help; and
- Airlines in Ireland use 2-way SMS to receive consumers' feedback about their services but also asking consumers to reply STOP if they want to cease communication. Consumers need to have the right of replying back with STOP in case they want to unsubscribe from a certain service or campaign.

As a cloud-based communication solution provider, Twilio welcomes ComReg's acknowledgement that communications and cloud are 'integral technologies in our daily lives' (page 4). Twilio's customer base is evidence of the increasing demand for cloud-based communication services and shows the benefits CPaaS provides to businesses. Using Twilio's software, companies can add communications capacity into applications across a range of industries, from financial services and retail to healthcare and non-profit endeavors. Twilio stands ready to help ComReg further form the regulatory framework, such that Ireland is well-placed to reap the benefits of cloudification and virtualization for the Irish communications market as well as the businesses and citizens served.





In our view, this requires broader harmonisation of the regulatory framework at a European level, so that companies providing services do not face a fragmented landscape which prevents on the one hand, EU businesses from employing- and on the other hand, EU citizens from experiencing- a uniform and harmonised product and service offering. Furthermore, from a service-provider perspective a harmonised approach reduces friction in the provision of services, and fragmentation-inflated compliance costs. Fragmentation should also be avoided, for example, through vehicles such as the customer charter which Comreg is developing, setting in place additional jurisdiction-specific rules.

Twilio supports ComReg's commitment to actively contributing to BEREC's work in reviewing the European Electronic Communications Code (EECC), and advising Ireland's position on this matter. As a company operating across multiple territories, Twilio sees the revision of the Code as a vital opportunity, on the one hand to simplify, harmonise, and centralise the European regulatory framework on telecommunications, and on the other hand to enable the cloudification of the European communication market. Our two main recommendations on ComReg's contribution to the EECC review are:

- (i) the simplification and harmonisation of authorization-related regulatory obligations (including reporting obligations) applicable to all providers of electronic communications services to business users; and
- (ii) the development of numbering policy proposals to increase efficiencies and flexibility of cloud-based solutions providers.

Twilio's unique position in the AI, communication, and cloud markets provides a specific perspective on upcoming compliance with the requirements under the EU AI Act and the Data Act. Twilio looks forward to working with you toward a workable and effective enforcement as ComReg prepares to take on supervisory duties on the implementation of these two EU regulations.

Similarly, Twilio is fundamentally committed to ensuring that the communications ecosystem is trusted by regulators, companies, and consumers. Secure cloud-based communications is the number one priority to ensure that consumers receive all the information they wish to receive while being shielded from unwanted communications. We therefore look forward to assisting ComReg's preparation to fulfil its new cybersecurity responsibilities.

The coming years will be crucial for the AI, cloud and telecommunications markets, and Twilio stands ready to be an active stakeholder, in order to inform ComReg's vision and strategic priorities with data and our unique perspective.

We remain at your disposal for any further questions you may have, and look forward to collaborating with you over the months to come.

# Virgin Media Ireland



**Virgin Media response to:**

**ComReg's Draft Strategy Statement 2025-2027. ComReg reference 24/103R published on 18 December 2024.**

**Date of submission: 12 February 2025.  
This response is non-confidential.**

## **Response**

This is the Virgin Media Ireland Limited (“Virgin Media”) response to ComReg’s draft Strategy Statement 2025-27 published on 18 December 2024.

The draft Strategy Statement comes at an important time in Ireland during which ComReg’s responsibilities are set to expand significantly. ComReg has recently been assigned or expects to be assigned over the lifetime of its Strategy Statement, new functions in the areas of consumer accessibility to services, network resilience and cybersecurity and data. These responsibilities will be additional to ComReg’s existing areas of responsibility covering electronic communications (including wholesale access), premium rate services, radio spectrum and numbering and postal services.

This is clearly set to be a busy and challenging period for ComReg, and for the entire industry, and as discussed further below it would be sensible in this context for ComReg to call out certain topics in the Final Strategy Statement.

It is important that ComReg’s already significant workload, which is set to increase further as new responsibilities are taken on (as summarised above), does not lead to any dilution in effort / focus in relation to ComReg’s existing areas of responsibility. ComReg makes some comments in support of this already in the draft Statement. This is welcome and could be strengthened by ComReg committing to ensuring that existing sectors continue to be given the right level of regulatory resources (both in terms of manpower and experience) to support efficient regulatory processes and that there is no reduction in stakeholder engagement, including up to senior levels because of their responsibilities expanding. ComReg should also take any learning that is available from other regulators whose remits have expanded in recent times – such as Ofcom in the UK.

With ComReg taking on demanding additional responsibilities, this will in turn lead to a greater set of regulatory demands being placed on certain commercial organisations, some of which will need to engage with ComReg for the first time across multiple fronts. Virgin Media submits that when these situations arise, the commercial organisation and ComReg should, insofar as is possible, adopt an engagement model that is efficient for both organisations whilst supporting ComReg in discharging its regulatory obligations. Where more than one regulator is involved in managing a particular area, Virgin Media also calls on ComReg (and any separate regulatory authority) to ensure that there is clarity as to their respective roles such that duplication of effort is minimised.

In some cases (e.g. data), the new areas of responsibility haven’t yet been fully codified, and in consequence nor have ComReg’s precise roles / responsibilities / powers been finalised. ComReg is right to publish its Strategy Statement now as further waiting would create uncertainty which would be unhelpful and potentially disruptive. That said, given the still moving parts (as noted above), ComReg also needs to be sufficiently flexible to amend, as necessary, its Strategy Statement in circumstances where, for example, its role changes as new areas of responsibility are finalised. Where future changes are made

through the completion of the legislative processes, Virgin Media would welcome further engagement by ComReg – particularly in circumstances where those changes were material / led to an amendment to ComReg’s Strategy Statement (or supporting documentation) being necessary.

Virgin Media supports ComReg’s proposal to move to a single, high-level, principles-based Strategy Statement supported by more detailed work plans for the different areas covered. This is sensible – maintaining the existing approach (separate strategies for each area that ComReg has responsibility for) would likely become unwieldy and burdensome to manage / update particularly in circumstances where those strategies need to be updated every 2 years. The one concern that Virgin Media would raise, is that the proposed approach should not lead to any dilution in engagement with stakeholders where engagement is needed. For example, ComReg should see the publication of its high-level Strategy Statement as the beginning and end of its stakeholder engagement – there should be continued, more focussed engagement with relevant stakeholders, as needed, on the content of the various sectoral work plans that fall within the Strategy Statement. ComReg should also guard against including items in those sectoral work plans that should properly form part of the high-level Strategy Statement. It would be useful for ComReg to provide more guidance on the sectoral work plans – in particular, the type of matters that they will (and won’t) cover, and how industry will be engaged in relation to them (particularly in relation to their genesis and amendment).

Virgin Media notes that ComReg will update the Strategy Statement every 2 years, in line with requirements placed on it. While 2 years is quite challenging it also strikes a sensible balance – less frequent risks the document becoming irrelevant (given the dynamism of the markets covered), while more frequent would become overly burdensome. While 2 years can be the fixed period to update, we submit that ComReg should also, within this timeframe, commit to making more regular 1-off amendments should circumstances require them (for example, if ComReg’s legislative mandate changed as discussed above). Given the dynamism of the various markets that ComReg will have responsibility for, ComReg should retain enough flexibility to intervene when market changes are sufficiently important to make this necessary (e.g. because of a change in EU objectives / market power etc).

Virgin Media strongly supports ComReg’s view that in circumstances where Significant Market Power (“SMP”) exists, the application of *ex post* powers alone is not sufficient. Appropriate and proportionate *ex ante* obligations should continue to be imposed until the relevant wholesale markets become effectively competitive. The imposition of SMP obligations, where still required, will continue to be needed for the proper functioning of markets, to the benefit of emerging competition and consumer outcomes. Virgin Media notes that ComReg will, in any event, continue to monitor on a regular basis SMP markets, to ensure that regulation imposed remains appropriate.

In relation to ComReg’s proposed priorities and goals, we submit that item # 11 under Compliance and Enforcement (“*Sufficient powers to manage this*”) appears to be more a matter for government rather than ComReg. The role for ComReg should be to ensure compliance based on the powers it has been granted. As currently written, the item looks like ComReg has an objective to get itself more powers, which doesn’t seem appropriate (Virgin Media considers this may just be a drafting point). Finally, and in line

with comments provided above, in relation to the section dealing with the ComReg organisation, it would be worth adding something to the effect of *“Maintain strong engagement with all sectors, including to senior levels.”*

In closing, Virgin Media supports ComReg's proactive approach in taking on its various new functions under the European Accessibility Act, the Data Act, the second Network and Information Systems Directive, the Critical Entities Resilience Directive, and the Artificial Intelligence Act. These new responsibilities will be critical in ensuring a robust and inclusive digital infrastructure for Ireland. However, we ask ComReg to bear in mind that the industry must also adapt to these changes, which will put significant pressure on resources. We urge ComReg to take this into account and to provide all necessary reciprocal support to the industry, so that all stakeholders can fully adapt to the new regulatory landscape. Collaboration, transparency, and steady engagement will be key to ensuring that all stakeholders can effectively meet their expanded responsibilities without undue strain.

Virgin Media appreciates the open and collaborative approach taken by ComReg in updating its Strategy during a time of significant change and would welcome further engagement with ComReg and industry as needed going forward.