



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

End-user Complaints Reporting and Data Provision

Specifications for Providers of Electronic Communications

Submissions to Consultation ComReg 25/12

Reference: ComReg 25/68s

Date: 10/10/2025

An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

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Submissions Received from Respondents

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Related Publications	Document Number
Consultation:	ComReg 25/12
Response to Consultation:	ComReg 25/68 D12/25

Redacted Information

In this document, ComReg has maintained the confidentiality of certain information, in accordance with ComReg's guidelines on the treatment of confidential information¹ (the "Confidentiality Guidelines"). The relevant information has been redacted and a [X■X] symbol has been inserted.

¹ "ComReg's Guidelines on the treatment of confidential information", Document No. 05/24, 22 March 2005, <https://www.comreg.ie/publication-download/response-to-consultation-guidelines-on-the-treatment-of-confidential-information>

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1. An Post Mobile

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End-user Complaints Reporting and Data Provision

To: retailconsult@comreg.ie
Subject: Submission to ComReg 25/12
Author: An Post Mobile
Date: 31 March 2025

Background

ComReg published its End-User Complaints Reporting and Data Provision (Specifications for providers of Electronic Communications) Consultation on 28 February 2025.

An Post Mobile welcomes the opportunity to contribute in reference to the questions posed by ComReg in its consultation document.

Q1. Do you have any comments on the proposed specification of complaints data requirements that ComReg proposes? Please explain the basis of your response in full referring to the appropriate paragraph number and provide any relevant information to support your response.

An Post Mobile Response

The proposed specification of complaints data as laid out in the Proposed Complaint Data Workbook (ComReg Document 25/12a) appears to be workable; however, please note the following:

Additional data Provisions template 25/12a

4a. Classification_4b. Subclassification: Clear explanations of each sub-classification are required, i.e. it would be helpful if the indicative explanation fields were further populated with examples.

Complaints Data submission timeframes and method of submission

With regards to the effective date, An Post Mobile notes paragraph 47:

"ComReg proposes that its Decision Instrument will take effect from the first day of the relevant period after the publication date of the Response to Consultation and Decision."

And that:

"This means if the Response to Consultation and Decision is published on or before 30 May 2025, complaints data relating to complaints received between 1 June 2025 and 30 November 2025 would be submitted to ComReg on or before 9 December 2025 using the proposed 'Complaints Data Template' (see Annex 1 to the Decision Instrument)."

While An Post Mobile is currently reporting to the detail required as set out in the current complaint data workbook, there are additional data provisions outlined in the proposed complaint data template. To accommodate these new data provisions and any others that may be included in the final template, our Customer Relationship Management (CRM) system would have to be adjusted accordingly. In addition, our Customer Services representatives would require additional training to ensure that these new data requirements were recorded correctly.

If ComReg's decision is published on or before 30 May 2025 as envisaged, the effective date would be the first day of the relevant reporting period of 1 June 2025 which immediately follows the decision date with no time allocated to allow necessary IT change requests to current systems and staff training.

An Post Mobile requests that an adequate notice period is provided to ensure that no retrospective data changes are required.

[Q. 2 Do you have any comments on ComReg's draft regulatory impact assessment? Please provide detailed reasons and supporting evidence for your view.](#)

An Post Mobile Response

An Post Mobile recognises ComReg's intention to streamline the complaints reporting and data it receives by replacing its guidance document with a formal decision. An Post Mobile further acknowledges ComReg's commitment to maintaining regulatory measures at a proportionate level.

Nonetheless, ComReg should ensure in the course of this consultation process that a balance is struck between consumer protection and not disproportionately increasing the regulatory reporting burden, particularly on the smaller providers in the mobile telecommunications sector.

2. Eircom Limited (trading as 'eir' and 'open eir'), collectively referred to as 'eir Group' or 'eir'

NON-CONFIDENTIAL

eir's Response to ComReg Consultation & Draft Decision:

End-User Complaint Reporting & Data Provision

ComReg Document: ComReg 25/12



31 March 2025

Page 1 of 5

DOCUMENT CONTROL

Document name	eir response to ComReg Consultation 25/12
Document Owner	eir
Status	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'.

Summary Response

eir welcomes the opportunity to participate in this consultation process. For improved clarity and to aid informed consultation responses, in future we hope that ComReg will consider setting out clearly what changes it is proposing between existing and proposed measures, in the interests of efficiency.

The key differences we have noted between this draft Decision and previously issued guidance are:

- Separate workbook submissions are now required for any subsidiary, related company or sub-brand;
- Any provider (or sub-brand etc.) with no complaints during a given period must now submit a 'Nil Return' report;
- Separate sheets are now required in each reporting workbook relating to Mobile, Fixed Voice and Broadband; and
- The 'Progression' column in the reporting template is no longer needed.

eir request that the complaint data collected be simplified to data that has the potential to be more meaningfully comparative. In addition, we have also asked for the exclusion of certain categories of data from ComReg's published reports, clarity on the categorisation of bundle related complaints and clarity on the proposed first report date.

Q.1 Do you have any comments on the proposed specification of complaints data requirements that ComReg proposes? Please explain the basis of your response in full referring to the appropriate paragraph number and provide any relevant information to support your response.

1. eir submits that the complaints data template (sheet 6) in the data workbook should include 'Date Received', 'Date Acknowledged' and 'Date Closed' fields. The 'Date Response Issued' field should be removed.

As set out by eir in engagements with ComReg in relation to the complaints reporting 'Regulatory Guidance', the definition of a 'Complaint Response' in D04/17 encompasses both final and interim responses. The field heading in the reporting template and data dictionary of both the Guidance and this draft Decision refer to a single date while providing no indication of the actual date being sought. There may be multiple engagements with a customer, and eir noted to ComReg that if they were in fact seeking the final response date in the 'Date Response Issued' field, that will typically align with the 'Date Closed' field.

In response to eir's query on what exactly was being sought in the 'Date Response Issued' field, ComReg noted:

"In so far as there is any non-alignment between the 'final response date' and the 'Date closed' in a complaint, eir should provide the relevant final response date."

This is not workable as 'final response date' is not defined. In the reports that eir submitted subsequent to the above advice from ComReg, we populated the field on a best effort basis by inputting the most recent response that eir had on record. Having reviewed our procedures we can confirm that the final response date on resolution of a complaint now aligns with the closed date. Therefore the simplest, most meaningful and comparable field is the 'Date Closed' field. Industry must be able to compile these reports in a straightforward automated manner. We note that ComReg has stated its aim is to have clear, comprehensible, reliable and comparable data – the 'Date Response Issued' field does not meet that objective.

While we acknowledge the statutory footing of this complaint reporting requirement, and the powers of specification in this given to ComReg, we also note that requirements imposed by ComReg must be appropriate, proportionate and justified, in light of a related analysis conducted. In this regard, if ComReg is not agreeable to removing this field, we ask that the rationale and definition for this be set out clearly, including evidence that is relied upon to demonstrate this as meaningful. This is not evident from the current Regulatory Impact Assessment included in the consultation.

2. The classification sheet of the data workbook contains a number of sub-class categories which can be best described as customer service queries e.g. 'customer education, no refund due', 'customer education on contract' and 'unable to provide service to address or premises'. eir notes that these are not valid complaints, but rather a result of a misunderstanding or an unreasonable expectation of a product or service. Data that falls within these categories must be excluded from ComReg's published reports, to avoid misrepresenting Industry by way of misleading information.
3. Please provide clarification on how bundle queries should be reported, in the context of separate sheets now required in each reporting workbook relating to Mobile, Fixed Voice and Broadband. An example of a complaint could be relating to a discount for a bundle rental price.
4. It appears that the first report date under the Decision would be 09 December 2025 (assuming the final Decision is published in May 2025). Confirmation of this is requested, specifically that the first report date in the updated format is

not intended as 09 June, which is impractical given the changes required to generating the report.

Q.2 Do you have any comments on ComReg's draft regulatory impact assessment? Please provide detailed reasons and supporting evidence for your view.

5. There is nothing additional to add at this time, but please refer to the comments in Point 1 above, which highlight the importance of the evidence base being relied upon, particularly in relation to the value of the data being collected.

3. Sky Ireland

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End-user Complaints Reporting and Data Provision
Specifications for providers of Electronic Communications
Consultation

ComReg 25/12

31 March 2025



Introduction

Sky Ireland Limited (“**Sky**”) appreciate the opportunity to respond to ComReg’s Consultation on End-user Complaints Reporting and Data Provision.

While we welcome ComReg’s initiative to ensure all providers follow the same approach in providing comparable complaints data to ComReg and enhance consumer protection through standardized complaints reporting, we would like to highlight several concerns regarding the implementation of the proposed reporting template:

Q.1 Do you have any comments on the proposed specification of complaints data requirements that ComReg proposes? Please explain the basis of your response in full referring to the appropriate paragraph number and provide any relevant information to support your response.

Paragraphs 47 and 52 of the consultation document state that “*ComReg proposes that its Decision Instrument will take effect from the first day of the relevant period after the publication date of the Response to Consultation and Decision*”. Footnote 33 further clarifies that “*this means if the Response to Consultation and Decision is published on or before 30 May 2025, complaints data relating to complaints received between 1 June 2025 and 30 November 2025 would be submitted to ComReg on or before 9 December 2025 using the proposed ‘Complaints Data Template’ (see Annex 1 to the Decision Instrument)*”.

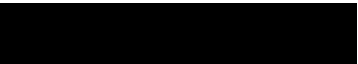
Given the uncertainty of the final version of the ‘Complaints Data Template’ (which may change as a result of this Consultation), we do not see how this could be possible. In any event, the requirements specified in this Consultation cannot pre-empt the outcome of the Decision and service providers cannot be expected to implement any requirements solely based on the proposed specifications arising from this Consultation.

Due to the complexity of the required changes, we need sufficient implementation time before the requirements specified by any future decision become binding. Making changes to our reporting systems is a time-consuming process that involves significant effort and resources. This is particularly challenging if the decision is issued on or before 30 May 2025, as the reporting period for which the ‘Complaints Data Template’ is expected to be used starts on 1 June 2025. The process of adapting our current systems to meet the new reporting requirements involves system modifications and staff training. Given the complexity of these tasks, we foresee challenges in completing the implementation within the stipulated timeframe (in particular if the decision should take effect from the first day of the reporting period after the publication date).

If the ‘Complaints Data Template’ is further updated as a result of this consultation (or any further amendments as specified by footnote 17), any additional changes or requirements that need to be added to the reporting system will involve further development work and modifications to our current reporting systems. This adds to the complexity and time required for implementation.

To address these concerns, we recommend specifying the implementation period. Allowing a longer transition period would enable providers to adequately prepare and ensure compliance with the decision issued as a result of this consultation.

In addition, according to paragraph 39 “*ComReg proposes to require that complaints for Mobile, Fixed Voice, and Broadband service provision, where applicable, are provided as clearly identified individual sheets within the complaints data submission*”. Our current system design does not split complaints between Fixed Voice and Broadband services, which means we would need to redesign our systems to accommodate this separation.



Additionally, we have numerous cases where a complaint may relate to both Fixed Voice and Broadband services because our Fixed Voice service relies on Broadband service. In such scenarios, the complaint pertains to both services, and we would need to report this on an additional individual sheet (for complaints related to both services) rather than duplicating it across both Fixed Voice and Broadband sheets. This approach would prevent inflating the number of actual complaints received within the relevant period. For this reason, we believe ComReg should allow flexibility in reporting complaints that span multiple services to avoid inflating complaint numbers.

Moreover, Sky would welcome clarity from ComReg on the difference between the following data fields:

42.5. **'Date response issued':** *The date that the 'Complaint Response' is issued to the end-user.*²⁶

42.6. **'Date closed':** *The date the complaint was finally closed*²⁷

Footnote 26 refers to section 4.3.1 (ii) of the ComReg's Decision D04/17:

"An undertaking shall ensure that: (ii) The Complaints Response is provided to the end-user within a maximum timeframe of 10 Working Days;"

Footnote 27 refers to section 4.2.3 (ii) of the ComReg's Decision D04/17:

"Undertakings shall ensure the minimum information recorded in relation to a complaint includes: (ii) The date the complaint was raised by the end-user and dates of all communication throughout the life cycle of the complaint to final closure;"

According to the definition included in the ComReg's Decision D04/17: *'Complaint Response' means a communication from the undertaking to the end-user that addresses all aspects of the complaint raised by the end-user and provides reasons, where Complaint Resolution is not provided as part of the response, for any delay and the steps being undertaken by the undertaking in investigating and resolving the complaint together with a provisional resolution date where available.*

Throughout the lifecycle of a complaint, we engage in multiple communications with the customer via various channels, including telephone, to expedite the resolution process. Consequently, the 'Complaint Response' (in written format) is typically issued at the time the complaint is closed. Given that ComReg requires two distinct data fields, we seek clarification on whether ComReg expects providers to report all communications with the customer (as per footnote 27), including those conducted via telephone or other channels, throughout the lifecycle of the complaint. Reporting all such communications would be highly complex and would not be feasible within the specified timelines. This would require an even more extended implementation period, or alternatively, implementing the reporting requirements in phases.

Q.2 Do you have any comments on ComReg's draft regulatory impact assessment? Please provide detailed reasons and supporting evidence for your view.

Response: Sky agrees with the ComReg assessment that imposing an additional obligation or requiring providers to provide complaints data at a greater frequency than is already required would create an unjustified burden for providers. However, in view of the issues discussed in response to Q1, we believe that the implementation period is required to allow providers to adequately prepare and ensure compliance with the decision issued as a result of this consultation.

4. Three Ireland

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Three Ireland (Hutchison) Limited.
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27 March 2025

Commission for Communications Regulation
One Dockland Central
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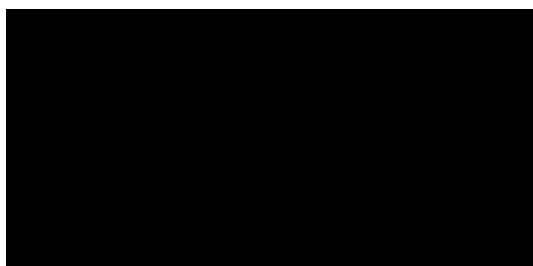
Dear Ms. Ciara,

Submission to ComReg 25/12 (End-user Complaints Reporting and Data Provision)

In response to ComReg 25/12 consultation letter dated 28/02/2025, we seek clarification on the following points:

- The new template excludes the progression column for complaints to ComReg. Should we remove this column now? If so, please explain the reasoning.
- The prescribed date format in the new template is [DDMMYYYY]. Could it be updated to [DD/MM/YYYY]? If not, this will necessitate considerable system modifications for Three.
- Regarding the classification and sub-classification tab, may we add new sub-classifications? The proposed additions are highlighted in yellow in the attached Excel tab "4a.Classification_4b.Subclass." Additionally, we would like to clarify whether this is the correct tab to add them, or should they be included under "additional" tab?
- We noticed that there is no sperate tab for Resolution (remedial action), so we will include remedies/actions per case within the Resolution column itself. Please confirm if it's a correct approach.
- We request a test upload before the obligation begins to identify any format changes needed before the actual date for loading live data.

Yours sincerely,



5. Virgin Media Ireland Limited

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Virgin Media response to:

ComReg's Consultation on "End User Complaints Reporting and Data Provision" – Reference 25/12 published 25 February 2025.

31 March 2025

Non-Confidential

Introduction

Virgin Media Ireland Limited (“**Virgin Media**”) welcomes the opportunity to respond to the consultation published by the Commission for Communications Regulation (“**ComReg**”) on 28 February 2025 titled ‘End User Complaints Reporting and Data Provision -Specifications for Providers of Electronic Communications’ (ComReg Doc 25/12) (“**the Consultation**”).

All capitalised terms in this response have the same meanings as in the Consultation. All paragraph references in this response are references to paragraphs of the Consultation. No part of this response is confidential.

We would also note, at the outset, that for the three 6-month reporting periods which have occurred to date, Virgin Media has submitted End-user Complaints Reports to ComReg in accordance with Section 43(a) of the Communications Regulation and Digital Hub Development Agency (Amendment) Act 2023 (“**2023 Act**”).

As to the purpose of the Consultation, ComReg states in paragraph 7 that it *“has identified areas where the quality of complaints data it receives can be improved”* and ComReg proposes, in paragraph 8, to *“put the principles that were set out in ComReg’s Regulatory Guidance on a more formal footing”*. This would be done by withdrawing the current Regulatory Guidance and superseding it with a Decision Instrument. The Decision Instrument would require Providers to submit their End-user Complaints Reports to ComReg in a prescribed form and manner as set out in Annex 1 of the Consultation (‘End-user Complaints Reporting and Data Provision; Proposed Complaints Data Workbook’).

The overall objective is described in paragraph 10: *“ComReg expects that specifying requirements will enhance the manner in which complaints data is provided to ComReg by providers ensuring that it is clear, comprehensible, reliable and comparable. This will better enable ComReg to carry out its functions and to fulfil its objectives.”* We further note ComReg’s expressed concern *“that the data currently being provided is not complete or comparable”* (paragraph 22) and its view that *“experience to date has shown that the manner of reporting by providers does not adhere to the format in the Regulatory Guidance in all instances.”* (paragraph 20).

We support much of ComReg’s overall objective as outlined above. We have no objection to amending the Regulatory Guidance and any related materials, to such extent as may reasonably be required, and we would be happy to engage with ComReg on the form and content of future End-user Complaints Reports.

We submit, however, that it is not necessary to move from the existing Regulatory Guidance to a full Decision Instrument. The current Regulatory Guidance framework is fit for purpose and revising it to the extent required, while also engaging proactively with industry, would be quite sufficient to address ComReg’s stated concerns.

We must also point to the lack of engagement with key stakeholders prior to publication of the Consultation. In our recent response to ComReg’s consultation on “Missed and Delayed

Service and Installation Appointments – End User Compensation”¹ we noted a similar lack of pre-consultation engagement. We stated in that response that it *“would have been advantageous for all parties if ComReg had issued a Call for Inputs or had otherwise engaged with industry prior to initiating a full consultation ... Such in-depth engagement is essential to determine the appropriate obligations and the manner of their implementation.”* Our view expressed in response to that consultation applies equally in this one.

We would also point to Goal No. 15 set out in ComReg’s Draft 2025-2027 Strategy Statement²: *“Goal 15: We will engage proactively with our stakeholders, including new stakeholders within our expanded remit.”* We welcome such proactive engagement and we submit that for some matters, such as that which is the subject of the Consultation, it should not begin with a consultation.

We submit that some simple interim steps could and should have been taken by ComReg before proceeding to a full-blown consultation on a proposal to switch from a guidance-based to a decision-based framework. We would urge ComReg to reconsider its proposed approach and to engage directly with key stakeholders through meetings and/or workshops. By doing so, ComReg can determine if its identified concerns can be adequately addressed by revising the current framework rather than replacing it with a new framework. If ComReg should ultimately determine that it is necessary to move to an entirely new framework, so be it, but we believe that we are not yet at that point. We submit that direct open engagement with industry would be more practical and efficient, far less onerous, and just as fruitful.

Please find below our responses to the specific questions in the Consultation.

Virgin Media Response to Consultation Questions

Q1. Do you have any comments on the proposed specification of complaints data requirements that ComReg proposes? Please explain the basis of your response in full referring to the appropriate paragraph number and provide any relevant information to support your response.

Subject to our overarching concern with the proposed manner in which the End-User Complaints Report requirements would be imposed, as set out in the Introduction to this response, we have no objection to the proposal to modify certain reporting parameters, to include aligning the sub-classifications under a related classification and removing the requirement to provide ‘Progression’ data.

We do not agree with the proposed timeframes for implementation/delivery of Complaint Report specifications or for submitting Complaint Reports. We consider both timeframes to be far too short. We expand on this point below.

(i) Short time frame proposed for implementation/delivery of the report specifications

¹ ComReg Doc 24/89 published 6 Nov 2024

² ComReg Doc 24/103R published 18 Dec 2024

We consider the proposed timeframe for Providers to implement the reporting changes, if implemented, to be far too short. As drafted, the report specifications would take effect from the first day of the reporting period following the date of publication of the Response to Consultation. This is same date on which the Decision Instrument would come into effect and is anticipated to be in May 2025. We also note the proposed report periods:

- A 6-month report period from 1 December to 31 May with 9 June as the due date for submission of the Complaint Report.
- A 6-month report period from 1 June to 30 November with 9 December as the due date for submission of the Complaint Report.

We understand that if the proposed Decision was finalised, and if it took effect in May 2025, then the first 6-month reporting period would commence on 1 June 2025, with the final report due on 9 December 2025. If our understanding is correct, Providers would have too little time to implement the required report specifications. In addition, some Providers might be unable to retrospectively provide data for dates that precede the date of implementation of changes to report specifications/ parameters.

(ii) Short time frame for the complaint report submission (due dates)

As noted above, the proposed report periods would run from (a) 1 December to 31 May with 9 June as the due date for the final Complaint Report, and (b) 1 June to 30 November with 9 December as the due date for the final Complaint Report.

Under these timeframes, a Provider would have only 5 to 6 working days, from the end of each 6-month report period, in which to gather, prepare and review six months of data before submitting its final Complaint Report. We submit that more time would be needed and that ComReg should allow a period of at least one month, noting that ComReg has discretion in this regard as the Act does not specify a due date.

By way of example, ComReg's QKDR Market data allows a period of approximately 1 month, from the end of the reporting period, in which to prepare relevant data and submit it to ComReg. A similar timeframe should apply in this instance.

Q2. Do you have any comments on ComReg's draft regulatory impact assessment? Please provide detailed reasons and supporting evidence for your view

We have no direct comments on the draft Regulatory Impact Assessment though we reiterate our overall view that the current guidance-based framework is fit for purpose and could be amended to address ComReg's concerns quite quickly and easily, such that switching to a new decision-based framework would be unnecessary, excessive and overly burdensome.

- End -

6. Vodafone Ireland

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Vodafone Response to Consultation

End-user Complaints Reporting and Data Provision
Response to Consultation, Draft Decision

Public Consultation

Reference: ComReg Doc 25/12

Version: Non-Confidential

Date: 31/03/25

Introduction

Vodafone welcomes the opportunity to respond to the Commission for Communications Regulation (ComReg)'s consultation on End-user complaints reporting and data provision. As required, following the Information Notice (ComReg document 23/99), Vodafone commenced the first report in line with ComRegs deadline of 9 December 2023 in accordance with the Regulatory Guidance, Data Dictionary and Report Template.

As outlined in Vodafone's letter to ComReg dated 8 December 2023. On receipt of notice Vodafone sought to align reporting capability to the ComReg template. Vodafone deployed updated reporting capability in December 2023 which allowed us to capture data in the ComReg specified format for future reports. Vodafone wish to express appreciation for the consideration afforded while this was implemented.

Consultation Questions

Question 1: Do you have any comments on the proposed specification of complaints data requirements that ComReg proposes? Please explain the basis of your response in full referring to the appropriate paragraph number and provide any relevant information to support your response.

Vodafone have considered the proposed specification of complaints data requirements and acknowledge that a defined template could help ensure consistency and comparability across providers. However, Vodafone would like to raise some concerns and provide feedback and observations.

Portal: In Paragraph 13 & 48 it addresses that in future, providers will be able to submit complaints data to ComReg via an online portal. of complaints data to ComReg will be possible via an online portal. ComReg state that this will be made available in the future. We would request clarity on when that will be in place. This should be in place for the submission date applicable after publication of a decision.

Personal Data: ComReg are requiring that no personal data is included yet they also require resolution details. A drop-down classification should be provided for resolution. Free text had been suggested up to 200 this still exposes a risk of personal data disclosure unnecessarily. It is not proportionate to require a line-by-line review of the case detail provided.

Use of the data: ComReg has not engaged at a bilateral level to understand any context to the data that Vodafone has provided. We would welcome clarification if that is going to be the case moving forward.

The split of Fixed Voice and Broadband – this is not always an appropriate separation. For example, a billing query on fixed voice and broadband goes into which category? It may be that ComReg only requires this split when it relates to Fixed Voice or Fixed Broadband technical queries.

Question 2: Do you have any comments on ComReg's draft regulatory impact assessment? Please provide detailed reasons and supporting evidence for your view

The Regulatory Impact Assessment talks at an extremely high level regarding the purpose of collection of data stating *“ComReg intends to use complaints data it receives to aid it in the performance of its functions, including but not limited to, providing input to policy considerations, provision of transparent information to end-users and to assist in identifying potential harms or other issues in the market.”*

Comparability: Vodafone understand ComReg may use the data provided for internal assessment however it should be made very clear that a much higher bar for comparability is required if ComReg intend at any stage to publish details regarding operator complaints data.

In terms of regulatory impact assessment, **ComReg advises that it wishes to put Regulatory Guidance on a more formal footing**, that the Regulatory Guidance will be withdrawn requiring us to provide complaints data in a specified form and manner. Vodafone has engaged in this process, taken on comments from ComReg and adjusted our approach accordingly. There has been no separate engagement on the process in advance of deciding to move to a formal requirement. The question arises why such an interventionist approach is required. The basic facts are that complaints into ComReg have reduced across all the sector consistently for the last five years yet the level of detail that now needs to be provided to ComReg keeps increasing. Vodafone would argue with the above and insist that Quarterly Consumer line statics reports, and information published by the CCPC provides enough insight for ComReg.

Operator Impact Assessment: The assessment does not set out the impact on operators to get this data in the format that ComReg requires. There is significant additional administrative burden arising for operators, especially now screening is required in the context of free text information up to 200 characters that we are being requested to include for each line item provided.

Ongoing operator engagement is required: Following publication of the decision Vodafone recommends that ComReg engage biannually with each operator to advise clearly how they have used the data and whether any clarifications are sought.

ENDS