



Universal Service: Provision of Directory of Subscribers

Submission to Consultation Document No. 19/127

Submission to Consultation

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An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

1 Lárcheantar na nDugaí, **Sráid** na nGildeanna, BÁC 1, Éire, D01, E4X0.
One Dockland Central, Guild Street, Dublin 1, Ireland, D01, E4X0.

Teil | Tel +353 1 804 9600 **Suíomh** | Web www.comreg.ie

Submission Received from Respondents

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DOCUMENT CONTROL

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The comments submitted in response to this consultation document are those of Eircom Limited and Meteor Mobile Communications Limited (trading as 'eir' and 'open eir'), collectively referred to as 'eir Group' or 'eir'.

Response to consultation

eir welcomes the opportunity to respond to ComReg's Consultation in relation to the Universal Service Obligation for the Provision of Directory of Subscribers.

Q.1 Do you agree with ComReg's preliminary view that a directory of subscribers USO is no longer warranted, as the vast majority of end-users have viable, alternative means to access a directory of subscribers service at an affordable price until at least the end of 2020?

eir notes ComReg's analysis in chapters 4 and 5 of the consultation and agrees with ComReg's view (paragraph 135) "*that a directory of subscribers USO is no longer warranted, as the vast majority of end-users have viable alternative means of access to a directory of subscribers service at an affordable price.*" The production of printed directories whether on an opt-out or opt-in basis is neither efficient nor environmentally friendly. It would be disproportionate to impose a USO on any operator particularly when it remains uncertain if the designated Universal Service Provider would be compensated for the reasonable costs it incurs in meeting the USO.

eir welcomes ComReg's recognition that there is no longer a need for a printed directory USO.

eir also welcomes ComReg's recognition, when considering option 4 (a USO mandating the provision of an online directory), that it would be inappropriate to impose regulation unnecessarily when services are already provided on a commercial basis.

Q.2 Do you agree with ComReg's preliminary view that Decision D04/14 would need to be amended to take account of the directory of subscribers service enjoyed by the majority of end-users?

ComReg's approach appears to be appropriate in the context of accessibility and equivalence for disabled end-users.

Q.3 Do you agree with ComReg's draft regulatory impact assessment of the impact of the proposed options?

eir agrees with ComReg's conclusions at the end of the regulatory impact assessment (paragraph 272 / 273):

- *“that a directory of subscribers USO for 2020 is not warranted at this time given the low number of end-users who requested a printed phonebook directory in 2019 and the potential cost to any USP(s).”*
- *“the online directory of subscribers currently provided by eir, until at least the end of 2020, to be an accessible and affordable alternative for the sourcing of phone numbers.”*
- *“having regard to evolving technological and social developments, the number of end-users who in 2019 requested a printed directory, and the likely impact on these end-users absent a USO, that a complete removal of an obligation, i.e. Option 1 ‘No designation of a USP and rely on normal market conditions to deliver a directory of subscribers service (No USO),’ is warranted at this time.”*

Q.4 Do you have any comments on ComReg's draft decision instrument?

eir objects to the reference to it in Section 3 of the draft Decision Instrument. It is not clear why eir should be singled out for special mention. It is irrelevant which Undertaking was previously designated with the USO for printed directories. Indeed if there was to have been a designation, no Undertaking should have been excluded from the opportunity. The simple fact is that no Undertaking is being designated. eir also considers the phrase ‘at this time’ to be otiose. Taking these points into account eir requests that the first sentence of Section 3 be amended as follows:

“ComReg’s decision is not to designate ~~eir, or any other undertaking,~~ as the USP, ~~at this time,~~ with a directory of subscribers universal service obligation for the period post 31 December 2019.”

Consequently the definition of eir should be deleted from Section 2.