

# Universal Service Requirements – Provision of Access at a Fixed Location (AFL) by Eircom Limited

Quality of Service Performance Data Q4 2020 (1 October – 31 December) & YTD 2020/2021 (1 July 2020 – 31 December 2020)

#### **Information Notice**

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#### 1 Foreword

- 1. The Commission for Communications Regulation ("ComReg") is responsible for the regulation of the electronic communications sector in accordance with national and EU legislation. One of ComReg's functions in this regard is to determine the scope of the Universal Service Obligation ("USO") for the Irish market and to decide which undertaking(s) should be designated as the Universal Service Provider(s) ("USP"). On 29 July 2016 ComReg designated Eircom Limited ("Eircom") as the USP for access at a fixed location ("AFL") until 30 June 2021<sup>1</sup>.
- 2. Regulation 10 of the European Communities (Electronic Communications Networks and Services) (Universal Service and Users' Rights) Regulations 2011 ("the Regulations") requires the USP to publish information on its performance in relation to the provision of the USO. In exercise of ComReg's general powers to publish information under Regulation 10 of the 2011 Framework Regulations<sup>2</sup>, ComReg publishes Eircom's quality of service performance data on a quarterly basis.
- 3. ComReg D02/19³, published on 13 March 2019, set legally binding annual quality of service performance targets for Eircom, as the designated USP, in respect of connections and service availability targets at national and subnational levels. Failure by Eircom to achieve any of the annual targets (effective annually from 1 July 2019) would constitute non-compliance with its regulatory obligations. ComReg has powers, under Regulation 31 of the Regulations, in relation to monitoring compliance and enforcement of such obligations.
- 4. The service availability target combines fault occurrence performance achieved and fault repair performance achieved to report the maximum working days outage per line.

<sup>&</sup>lt;sup>1</sup> "Universal Service Requirements – Provision of access at a fixed location (AFL USO)", Response to Consultation and Decision, ComReg D05/16, dated 29/07/2016.

<sup>&</sup>lt;sup>2</sup> European Communities (Electronic Communications Networks and Services) (Framework) Regulations 2011.

<sup>&</sup>lt;sup>3</sup> "Universal Service Requirements – Provision of access at a fixed location (AFL) – Quality of Service (QoS)" Response to Consultation and Decision, ComReg D02/19, ComReg Documents 19/21 and 19/21a.

5. Having regard to the above, in this Information Notice, ComReg is publishing Eircom's quarterly quality of service performance data with respect to Quarter 4 2020 (1 October 2020 to 31 December 2020), ("the reporting period"), and Year To Date (YTD) performance data (1 July 2020 to 31 December 2020) for connection times and service availability at national level and for each of the three sub-national areas.

The three sub-national areas are: Area 14, Area 25, and Area 36.

- 6. Other performance data with respect to Quarter 4 2020 (relevant to connections and, repair times and fault occurrence which contribute to the calculation of service availability) are also presented.
- 7. Appendices 2-5 outline the annual USO quality of service performance targets specified in ComReg D02/19 and the YTD performance achieved by Eircom.
- 8. The failure by Eircom to achieve any of the targets set out in ComReg D02/19 by 30 June 2021 constitutes non-compliance and may give rise to the enforcement procedures set out under Regulation 31 of the Regulations.

<sup>&</sup>lt;sup>4</sup> Areas where Eircom faces greater market-driven infrastructure-based competition, including from Vodafone/ESB/SIRO or UPC.

<sup>&</sup>lt;sup>5</sup> Reflects the original NBP intervention area. It comprises the areas where a high capacity broadband access network is intended to be made available through Irish government subsidies.

<sup>&</sup>lt;sup>6</sup> Areas where Eircom faces no competition from any provider of fixed infrastructure but could face competition from mobile networks providing fixed access solutions.

## 2 Quality of Service Performance - National

#### 2.1 Performance of Eircom with respect to connections

9. This Section presents Eircom's performance in completing fixed-line installations during the reporting period by providing information on performance for in-situ connections and all other connections at national level. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of performance towards the annual target. The actual annual performance will be measured, for compliance purposes, with reference to the total number of in-situ connections and all other connections for the year.

#### In-Situ Connections<sup>7</sup>

In-Situ Connections Performance Targets (ComReg Decision D02/19)		Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 24	80% of connections to be			
hours of	completed within this time	90.3	89.6	89.9
request	period			
Within 2	99.8% of connections to be			
weeks of	completed within this time	99.5	99.4	99.5
request	period			
Within 2	100% of connections to be			
months of	completed within this time	100.0	100.0	100.0
request	period			

**Table 1: In-Situ Connections - National** 

<sup>&</sup>lt;sup>7</sup> Data reported in this section excludes information regarding in-situ connections with an Agreed Date, as Agreed Dates for in-situ connections only arise when a customer seeks, and Eircom agrees to, a deferred installation e.g. a connection for a holiday home, etc.

#### All Other Connections<sup>8</sup>

All Other Connections Performance Targets (ComReg Decision D02/19)		Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 2 weeks of request	<b>80%</b> of all requests to be completed within this time period	95.2	94.6	94.9
Within 4 weeks of request	85% of all requests to be completed within this time period	98.4	98.1	98.2
Within 8 weeks of request	90% of all requests to be completed within this time period	99.5	99.2	99.4
Within 13 weeks of request	95% of all requests to be completed within this time period	99.7	99.6	99.7
Within 26 weeks of request	100% of all requests to be completed within this time period	99.9	100.0	99.9

**Table 2: All Other Connections - National** 

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<sup>&</sup>lt;sup>8</sup> Data reported in this section excludes information regarding in-situ connections. Also, where a customer-introduced delay is recorded, and there is auditable evidence of such, Eircom is required to exclude these Valid Service Orders for the purposes of the performance targets.

#### 2.2 Performance of Eircom with respect to Fault Rate Occurrence

10. This Section presents the rate of line faults reported<sup>9</sup> to Eircom at national level. All line faults reported in the reporting period are expressed in relation to the average number of installed lines for the reporting period<sup>10</sup>. As ComReg publishes USO performance data on a quarterly basis, the sum of the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured with reference to the total number of line faults<sup>11</sup> for the year and the average number of installed lines for the year.

#### **Fault Rate Occurrence**

	Q3 2020 Result	Q4 2020 Result	YTD Result (1 July 2020 – 31 Dec 2020)
Line faults per 100 lines	2.6	2.4	5.0

Table 3: Fault Rate Occurrence - National

#### 2.3 Performance of Eircom with respect to Fault Repair Times

11. This Section presents Eircom's performance during the reporting period by providing information on fault repair times<sup>12</sup> at national level. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured with reference to the total number of fault repairs for the year.

<sup>&</sup>lt;sup>9</sup> Excluding line faults which have occurred due to vandalism (including theft) and / or third party damage, which have been verified and audited.

<sup>&</sup>lt;sup>10</sup> For Q4 2020, the rate of total faults per 100 lines was 2.8 and the rate of line faults including line faults which have occurred due to vandalism (including theft) and/or third party damage was 2.6.

<sup>&</sup>lt;sup>11</sup> Excluding line faults which have occurred due to vandalism (including theft) and /or third party damage, which have been verified and audited.

<sup>&</sup>lt;sup>12</sup> Data pertaining to Fault Repairs with an Agreed Date are included in this metric from 1 July 2010.

#### Fault Repair Times

		Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 2	Fault repairs			
working	completed within this	79.8	82.2	80.9
days	time period			
Within 4	Fault repairs			
working	completed within this	92.3	93.7	93.0
days	time period			
Within 5	Fault repairs			
working	completed within this	95.2	95.9	95.5
days	time period			
Within 10	Fault repairs			
working	completed within this	98.8	98.6	98.7
days	time period			

**Table 4: Fault Repair Times - National** 

#### 2.4 Performance of Eircom with respect to Service Availability

12. This Section shows Eircom's service availability performance during the reporting period by providing information at national level. Service availability combines the two parameters of fault occurrence and fault repair times as presented above. Schedule 1 of ComReg 19/21a sets out the methodology for calculating and measuring the Service Availability Performance result. Service availability, when measured, will report the maximum working days outage per line. The following table presents the Average Fault Repair Time Performance and the Line Fault Occurrence Performance per 100 lines, both of which contribute to the calculation and measurement of the Service Availability result. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured, for compliance purposes, with reference to the average fault repair time for the year and the line fault occurrence for the year.

#### Service Availability Performance

National Service Availability Target (ComReg Decision D02/19) 0.237	Q3 2020 Result	Q4 2020 Result	YTD Result (1 July 2020 – 31 Dec 2020)
Average Fault Repair Time Performance	1.6977	1.6135	1.6573
Line Fault Occurrence Performance per 100 lines	2.5819	2.4413	5.0255
Maximum Working Days Outage per line	<u>0.044</u>	<u>0.039</u>	0.08313

**Table 5: Service Availability - National** 

 $<sup>^{13}</sup>$  If the annual performance (1 July 2020 – 30 June 2021) result is  $\leq$  0.237, the target has been achieved. If the annual performance (1 July 2020 – 30 June 2021) result is > 0.237, the performance target has not been achieved.

### 3 Supplementary Quality of Service Performance Data - National

#### 3.1 Performance of Eircom - Direct Access PSTN Connections<sup>14</sup>

13. This Section presents Eircom's performance during the reporting period by providing information on Supply Time Fastest at national level. The information submitted by Eircom is required to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive<sup>15</sup>.

#### **Supply Time Fastest**

	Q4 2020 Total	Q4 2020 Residential	Q4 2020 Business
Fastest <b>95%</b> - elapsed days	14.0	14.0	22.0
Fastest <b>99%</b> - elapsed days	45.0	29.0	114.0

Table 6: Direct Access PSTN Connections-Supply Time Fastest - National

#### 3.2 Performance of Eircom - Direct Access PSTN Repairs<sup>16</sup>

14. This Section presents Eircom's performance during the reporting period by providing information on Repair Time Fastest at national level. The information submitted by Eircom is required to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive<sup>17</sup>.

<sup>&</sup>lt;sup>14</sup> Data pertaining to connections with an Agreed Date are excluded from this metric as a date can only be agreed for in-situ connections where the customer requests and Eircom agrees to, a deferred installation.

<sup>&</sup>lt;sup>15</sup> Directive 2002/22/EC of the European Parliament and of the Council of 7 March 2002 on universal service and users' rights relating to electronic communications networks and services as amended by Directive 2009/136/EC of the European Parliament and of the Council of 25 November 2009 ("the Universal Service Directive").

<sup>&</sup>lt;sup>16</sup> Data pertaining to Fault Repairs with an Agreed Date are included in this metric from 1 July 2010.

<sup>&</sup>lt;sup>17</sup> The Universal Service Directive.

#### Repair Time Fastest

	Q4 2020 Total	Q4 2020 Residential	Q4 2020 Business
Fastest 80% completed (working hours)	15.783	16.350	15.533
Fastest 95% completed (working hours)	37.283	40.717	35.008

Table 7: Direct Access PSTN Repairs – Repair Time Fastest – National

#### 3.3 Performance of Eircom - Connections with an Agreed Date<sup>18</sup>

15. This Section presents Eircom's performance in completing fixed-line installations during the reporting period by providing information on performance regarding connections completed by the date agreed with the customer and performance regarding connections with an Agreed Date versus total connections at national level.

	Q4 2020 Result %
Connections with an Agreed Date	100.0

Table 8: Connections with an Agreed Date for all connections – National

	Q4 2020 Result %
Connections with an Agreed Date versus Total Connections	0.1

Table 9: Connections with an Agreed Date v. Total Connections – National

<sup>&</sup>lt;sup>18</sup> Data relating to this metric relates to customer-introduced delays for in-situ connections. For information, a date can only be agreed for in-situ connections where the customer requests and Eircom agrees to, a deferred installation.

#### 3.4 Performance of Eircom - Fault Repairs with an Agreed Date<sup>19</sup>

16. This Section presents Eircom's performance during the reporting period by providing information on performance regarding fault repairs completed by the date agreed with the customer and performance regarding fault repairs with an Agreed Date versus all repairs at national level.

	Q4 2020 Result %
Fault Repairs with an Agreed Date	99.3

Table 10: Fault Repairs with an Agreed Date - National

	Q4 2020 Result %
Fault Repairs with an Agreed Date versus All Repairs	7.1

Table 11: Fault Repairs with an Agreed Date v. All Repairs - National

<sup>&</sup>lt;sup>19</sup> Fault Repairs with an Agreed Date arise when an appointment is required to visit the Customer's premises and repair the fault. The "Agreed Date" means the appointment date and (if applicable) the time that Eircom and a Customer have agreed for Eircom to visit a customer's premises in respect of a Fault Repair; in the case of all such Agreed Dates, the Agreed Date is required to be recorded and fully verifiable.

# 4 Quality of Service Sub-National Performance – Area 1

#### 4.1 Performance of Eircom with respect to connections

17. This Section presents Eircom's performance in completing fixed-line installations during the reporting period by providing information on performance for in-situ connections and all other connections in Area 1. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of performance towards the annual target. The actual annual performance will be measured, for compliance purposes, with reference to the total number of in-situ connections and all other connections for the year.

#### In-Situ Connections<sup>20</sup>

	nnections Performance Targets omReg Decision D02/19)	Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 24	80% of connections to be			
hours of	completed within this time	91.1	83.5	86.9
request	period			
Within 2	99.8% of connections to be			
weeks of	completed within this time	98.8	98.5	98.6
request	period			
Within 2	100% of connections to be			
months of	completed within this time	100.0	100.0	100
request	period			

Table 12: In-Situ Connections - Area 1

<sup>&</sup>lt;sup>20</sup> Data reported in this section excludes information regarding in-situ connections with an Agreed Date, as Agreed Dates for in-situ connections only arise when a customer seeks, and Eircom agrees to, a deferred installation e.g. a connection for a holiday home, etc.

#### All Other Connections<sup>21</sup>

	Connections Performance Targets Reg Decision D02/19)	Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 2 weeks of request	<b>80%</b> of all requests to be completed within this time period	95.5	95.7	95.6
Within 4 weeks of request	<b>85%</b> of all requests to be completed within this time period	98.8	98.7	98.7
Within 8 weeks of request	<b>90%</b> of all requests to be completed within this time period	99.6	99.3	99.5
Within 13 weeks of request	95% of all requests to be completed within this time period	98.8	99.5	99.6
Within 26 weeks of request	100% of all requests to be completed within this time period	100.0	100.0	100.0

Table 13: All Other Connections - Area 1

<sup>&</sup>lt;sup>21</sup> Data reported in this section excludes information regarding in-situ connections. Also, where a customer-introduced delay is recorded, and there is auditable evidence of such, Eircom is required to exclude these Valid Service Orders for the purposes of the performance targets.

#### 4.2 Performance of Eircom with respect to Fault Rate Occurrence

18. This Section presents the rate of line faults reported<sup>22</sup> to Eircom in Area 1. All line faults reported in the reporting period are expressed in relation to the average number of installed lines for the reporting period<sup>23</sup>. As ComReg publishes USO performance data on a quarterly basis, the sum of the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured with reference to the total number of line faults<sup>24</sup> for the year and the average number of installed lines for the year.

#### Fault Rate Occurrence

	Q3 2020	Q4 2020	YTD Result
	Result	Result	(1 July 2020 –
	%	%	31 Dec 2020)
Line faults per 100 lines	1.4	1.4	2.8

Table 14: Fault Rate Occurrence - Area 1

#### 4.3 Performance of Eircom with respect to Fault Repair Times

19. This Section presents Eircom's performance during the reporting period by providing information on fault repair times in Area 1. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured with reference to the total number of fault repairs for the year.

<sup>&</sup>lt;sup>22</sup> Excluding line faults which have occurred due to vandalism (including theft) and /or third party damage, which have been verified and audited.

<sup>&</sup>lt;sup>23</sup> For Q4 2020, the rate of total faults per 100 lines was 1.6 and the rate of line faults including line faults which have occurred due to vandalism (including theft) and/or third party damage was 1.4.

<sup>&</sup>lt;sup>24</sup> Excluding line faults which have occurred due to vandalism (including theft) and /or third party damage, which have been verified and audited.

#### Fault Repair Times<sup>25</sup>

		Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 2 working days	Fault repairs completed within this time period	83.4	85.1	84.2
Within 4 working days	Fault repairs completed within this time period	93.7	95.2	94.4
Within 5 working days	Fault repairs completed within this time period	95.9	96.6	96.2
Within 10 working days	Fault repairs completed within this time period	98.7	98.6	98.6

Table 15: Fault Repair Times - Area 1

#### 4.4 Performance of Eircom with respect to Service Availability

20. This Section shows Eircom's service availability performance during the reporting period by providing information in Area 1. Service availability combines the two parameters of fault occurrence and fault repair as presented above. Schedule 1 of ComReg 19/21a sets out the methodology for calculating and measuring the Service Availability Performance result. Service availability, when measured, will report the maximum of working days outage per line. The following table presents the Average Fault Repair Time Performance and the Line Fault Occurrence Performance per 100 lines, both of which contribute to the calculation and measurement of the Service Availability result. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured, for compliance purposes, with reference to the average fault repair time for the year and the line fault occurrence for the year.

<sup>&</sup>lt;sup>25</sup> Data pertaining to Fault Repairs with an Agreed Date are included in this metric from 1 July 2010.

#### Service Availability Performance

Sub National Service Availability Target (ComReg Decision D02/19) 0.607	Q3 2020 Result	Q4 2020 Result	YTD Result (1 July 2020 – 31 Dec 2020)
Average Fault Repair Time Performance	1.5881	1.5126	1.5511
Line Fault Occurrence Performance per 100 lines	1.3943	1.3683	2.7630
Maximum Working Days Outage per line	0.022	<u>0.021</u>	0.043 <sup>26</sup>

Table 16: Service Availability - Area 1

 $<sup>^{26}</sup>$  If the annual performance (1 July 2020 – 30 June 2021) result is  $\leq$  0.607, the target has been achieved. If the annual performance (1 July 2020 – 30 June 2021) result is > 0.607, the performance target has not been achieved.

### 5 Supplementary Quality of Service Performance Data – Area 1

#### 5.1 Performance of Eircom - Direct Access PSTN Connections

21. This Section presents Eircom's performance during the reporting period by providing information on Supply Time Fastest in Area 1. The information submitted by Eircom is required to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive<sup>27</sup>.

#### Supply Time Fastest<sup>28</sup>

	Q4 2020 Total	Q4 2020 Residential	Q4 2020 Business
Fastest <b>95%</b> - elapsed days	14.0	14.0	19.0
Fastest <b>99%</b> - elapsed days	35.0	25.0	115.0

Table 17: Direct Access PSTN Connections-Supply Time Fastest – Area 1

#### 5.2 Performance of Eircom - Direct Access PSTN Repairs

22. This Section presents Eircom's performance during the reporting period by providing information on Repair Time Fastest in Area 1. The information submitted by Eircom is required to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive<sup>29</sup>.

<sup>&</sup>lt;sup>27</sup> The Universal Service Directive.

<sup>&</sup>lt;sup>28</sup> Data pertaining to connections with an Agreed Date are excluded from this metric as a date can only be agreed for in-situ connections where the customer requests and Eircom agrees to, a deferred installation.

<sup>&</sup>lt;sup>29</sup> The Universal Service Directive.

#### Repair Time Fastest<sup>30</sup>

	Q4 2020 Total	Q4 2020 Residential	Q4 2020 Business
Fastest 80% completed (working hours)	15.050	15.900	14.683
Fastest 95% completed (working hours)	31.863	37.306	29.540

Table 18: Direct Access PSTN Repairs – Repair Time Fastest – Area 1

#### 5.3 Performance of Eircom - Connections with an Agreed Date<sup>31</sup>

23. This Section presents Eircom's performance in completing fixed-line installations during the reporting period by providing information on performance regarding connections completed by the date agreed with the customer and performance regarding connections with an Agreed Date versus total connections in Area 1.

	Q4 2020 Result %
Connections with an Agreed Date	0

Table 19: Connections with an Agreed Date - Area 1

	Q4 2020 Result %
Connections with an Agreed Date versus Total Connections	0

Table 20: Connections with an Agreed Date v. Total Connections - Area 1

<sup>&</sup>lt;sup>30</sup> Data pertaining to Fault Repairs with an Agreed Date are included in this metric from 1 July 2010.

<sup>&</sup>lt;sup>31</sup> Data relating to this metric relates to customer-introduced delays for in-situ connections. For information, a date can only be agreed for in-situ connections where the customer requests and Eircom agrees to, a deferred installation.

#### 5.4 Performance of Eircom - Fault Repairs with an Agreed Date<sup>32</sup>

24. This Section presents Eircom's performance during the reporting period by providing information on fault repairs completed by the date agreed with the customer and performance regarding fault repairs with an Agreed Date versus all repairs in Area 1.

	Q4 2020 Result %
Fault Repairs with an Agreed Date	99.8

Table 21: Fault Repairs with an Agreed Date - Area 1

	Q4 2020 Result %
Fault Repairs with an Agreed Date versus All Repairs	8.8

Table 22: Fault Repairs with an Agreed Date v. All Repairs - Area 1

<sup>&</sup>lt;sup>32</sup> Fault Repairs with an Agreed Date arise when an appointment is required to visit the Customer's premises and repair the fault. The "Agreed Date" means the appointment date and (if applicable) the time that Eircom and a Customer have agreed for Eircom to visit a customer's premises in respect of a Fault Repair; in the case of all such Agreed Dates, the Agreed Date is required to be recorded and fully verifiable.

# 6 Quality of Service Sub-National Performance – Area 2

#### 6.1 Performance of Eircom with respect to connections

25. This Section presents Eircom's performance in completing fixed-line installations during the reporting period by providing information on performance for in-situ connections and all other connections in Area 2. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of performance towards the annual target. The actual annual performance will be measured, for compliance purposes, with reference to the total number of in-situ connections and all other connections for the year.

#### In-Situ Connections<sup>33</sup>

	Connections Performance Targets nReg Decision D02/19)	Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 24 hours of request	<b>80%</b> of connections to be completed within this time period	89.4	94.3	92.1
Within 2 weeks of request	<b>99.8%</b> of connections to be completed within this time period	100.0	100.0	100.0
Within 2 months of request	100% of connections to be completed within this time period	100.0	100.0	100.0

Table 23: In-Situ Connections - Area 2

<sup>&</sup>lt;sup>33</sup> Data reported in this section excludes information regarding in-situ connections with an Agreed Date, as Agreed Dates for in-situ connections only arise when a customer seeks, and Eircom agrees to, a deferred installation e.g. a connection for a holiday home, etc.

#### All Other Connections<sup>34</sup>

	Connections Performance Targets Reg Decision D02/19)	Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 2 weeks of request	<b>80%</b> of all requests to be completed within this time period	92.9	93.6	93.2
Within 4 weeks of request	85% of all requests to be completed within this time period	96.9	97.3	97.1
Within 8 weeks of request	90% of all requests to be completed within this time period	99.3	99.1	99.2
Within 13 weeks of request	95% of all requests to be completed within this time period	99.7	99.6	99.6
Within 26 weeks of request	100% of all requests to be completed within this time period	99.9	100.0	100.0

Table 24: All Other Connections - Area 2

<sup>&</sup>lt;sup>34</sup> Data reported in this section excludes information regarding in-situ connections. Also, where a customer-introduced delay is recorded, and there is auditable evidence of such, Eircom is required to exclude these Valid Service Orders for the purposes of the performance targets.

#### 6.2 Performance of Eircom with respect to Fault Rate Occurrence

26. This Section presents the rate of line faults reported<sup>35</sup> to Eircom in Area 2. All line faults reported in the reporting period are expressed in relation to the average number of installed lines for the reporting period<sup>36</sup>. As ComReg publishes USO performance data on a quarterly basis, the sum of the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured with reference to the total number of line faults<sup>37</sup> for the year and the average number of installed lines for the year.

#### Fault Rate Occurrence

	Q3 2020 Result	Q4 2020 Result	YTD Result (1 July 2020 – 31 Dec 2020)
Line faults per 100 lines	4.9	4.5	9.5

Table 25: Fault Rate Occurrence - Area 2

#### 6.3 Performance of Eircom with respect to Fault Repair Times

27. This Section presents Eircom's performance during the reporting period by providing information on fault repair times in Area 2. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured with reference to the total number of fault repairs for the year.

<sup>&</sup>lt;sup>35</sup> Excluding line faults which have occurred due to vandalism (including theft) and /or third party damage, which have been verified and audited.

<sup>&</sup>lt;sup>36</sup> For Q4 2020, the rate of total faults per 100 lines was 5.2 and the rate of line faults including line faults which have occurred due to vandalism (including theft) and/or third party damage was 4.9.

<sup>&</sup>lt;sup>37</sup> Excluding line faults which have occurred due to vandalism (including theft) and /or third party damage, which have been verified and audited.

#### Fault Repair Times<sup>38</sup>

		Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 2 working days	Fault repairs completed within this time period	78.1	80.2	79.1
Within 4 working days	Fault repairs completed within this time period	91.6	92.8	92.2
Within 5 working days	Fault repairs completed within this time period	95.1	95.4	95.2
Within 10 working days	Fault repairs completed within this time period	98.8	98.6	98.7

Table 26: Fault Repair Times - Area 2

#### 6.4 Performance of Eircom with respect to Service Availability

28. This Section shows Eircom's service availability performance during the reporting period by providing information in Area 2. Service availability combines the two parameters of fault occurrence and fault repair as presented above. Schedule 1 of ComReg 19/21a sets out the methodology for calculating and measuring the Service Availability Performance result. Service availability, when measured, will report the maximum working days outage per line. The following table presents the Average Fault Repair Time Performance and the Line Fault Occurrence Performance per 100 lines, both of which contribute to the calculation and measurement of the Service Availability result. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured, for compliance purposes, with reference to the average fault repair time for the year and the line fault occurrence for the year.

<sup>&</sup>lt;sup>38</sup> Data pertaining to Fault Repairs with an Agreed Date is included in this metric from 1 July 2010.

#### Service Availability Performance

Sub-National Service Availability Target (ComReg Decision D02/19) 0.607	Q3 2020 Result	Q4 2020 Result	YTD Result (1 July 2020 – 31 Dec 2020)
Average Fault Repair Time Performance	1.7467	1.6823	1.7162
Line Fault Occurrence Performance per 100 lines	4.9294	4.5483	9.4845
Maximum Working Days Outage per line	0.086	0.077	<u>0.163<sup>39</sup></u>

Table 27: Service Availability - Area 2

 $<sup>^{39}</sup>$  If the annual performance (1 July 2020 – 30 June 2021) result is  $\leq$  0.607, the target has been achieved. If the annual performance (1 July 2020 – 30 June 2021) result is > 0.607, the performance target has not been achieved.

# 7 Supplementary Quality of Service Performance Data – Area 2

#### 7.1 Performance of Eircom - Direct Access PSTN Connections

29. This Section presents Eircom's performance during the reporting period by providing information on Supply Time Fastest in Area 2. The information submitted by Eircom is required to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive<sup>40</sup>.

#### Supply Time Fastest<sup>41</sup>

	Q4 2020 Total	Q4 2020 Residential	Q4 2020 Business
Fastest <b>95%</b> - elapsed days	15.0	14.0	19.0
Fastest <b>99%</b> - elapsed days	50.0	51.0	29.0

Table 28: Direct Access PSTN Connections-Supply Time Fastest – Area 2

#### 7.2 Performance of Eircom - Direct Access PSTN Repairs

30. This Section presents Eircom's performance during the reporting period by providing information on Repair Time Fastest in Area 2. The information submitted by Eircom is required to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive<sup>42</sup>.

<sup>&</sup>lt;sup>40</sup> The Universal Service Directive.

<sup>&</sup>lt;sup>41</sup> Data pertaining to connections with an Agreed Date is excluded from this metric as a date can only be agreed for in-situ connections where the customer requests and Eircom agrees to, a deferred installation.

<sup>&</sup>lt;sup>42</sup> The Universal Service Directive.

#### Repair Time Fastest<sup>43</sup>

	Q4 2020 Total	Q4 2020 Residential	Q4 2020 Business
Fastest 80% completed (working hours)	16.000	17.087	15.910
Fastest 95% completed (working hours)	39.454	41.169	37.603

Table 29: Direct Access PSTN Repairs – Repair Time Fastest – Area 2

#### 7.3 Performance of Eircom - Connections with an Agreed Date<sup>44</sup>

31. This Section presents Eircom's performance in completing fixed-line installations during the reporting period by providing information on performance regarding connections completed by the date agreed with the customer and performance regarding connections with an Agreed Date versus total connections in Area 2.

	Q4 2020 Result %
Connections with an Agreed Date	100

Table 30: Connections with an Agreed Date – Area 2

	Q4 2020 Result %
Connections with an Agreed Date versus Total Connections	0.2

Table 31: Connections with an Agreed Date v. Total Connections - Area 2

<sup>&</sup>lt;sup>43</sup> Data pertaining to Fault Repairs with an Agreed Date is included in this metric from 1 July 2010.

<sup>&</sup>lt;sup>44</sup> Data relating to this metric relates to customer-introduced delays for in-situ connections. For information, a date can only be agreed for in-situ connections where the customer requests and Eircom agrees to, a deferred installation.

#### 7.4 Performance of Eircom - Fault Repairs with an Agreed Date<sup>45</sup>

32. This Section presents Eircom's performance during the reporting period by providing information on fault repairs completed by the date agreed with the customer and performance regarding fault repairs with an Agreed Date versus all repairs in Area 2.

	Q4 2020 Result %
Fault Repairs with an Agreed Date	99.6

Table 32: Fault Repairs with an Agreed Date - Area 2

	Q4 2020 Result %
Fault Repairs with an Agreed Date versus All Repairs	6.4

Table 33: Fault Repairs with an Agreed Date v. All Repairs - Area 2

<sup>&</sup>lt;sup>45</sup> Fault Repairs with an Agreed Date arise when an appointment is required to visit the Customer's premises and repair the fault. The Agreed Date means the appointment date and (if applicable) the time that Eircom and a Customer have agreed for Eircom to visit a Customer's premises in respect of a Fault Repair; in the case of all such Agreed Dates, the Agreed Date is required to be recorded and fully verifiable.

# 8 Quality of Service Sub-National Performance – Area 3

#### 8.1 Performance of Eircom with respect to connections

33. This Section presents Eircom's performance in completing fixed-line installations during the reporting period by providing information on performance for in-situ connections and all other connections in Area 3. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of performance towards the annual target. The actual annual performance will be measured, for compliance purposes, with reference to the total number of in-situ connections and all other connections for the year.

#### In-Situ Connections<sup>46</sup>

	nnections Performance Targets leg Decision D02/19)	Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 24	80% of connections to			
hours of	be completed within this	90.4	93.5	92.0
request	time period			
Within 2	99.8% of connections to			
weeks of	be completed within this	100.0	100.0	100.0
request	time period			
Within 2	100% of connections to			
months of	be completed within this	100.0	100.0	100.0
request	time period			

Table 34: In-Situ Connections - Area 3

<sup>&</sup>lt;sup>46</sup> Data reported in this section excludes information regarding in-situ connections with an Agreed Date, as Agreed Dates for in-situ connections only arise when a customer seeks, and Eircom agrees to, a deferred installation e.g. a connection for a holiday home, etc.

#### All Other Connections<sup>47</sup>

Per	Other Connections formance Targets Reg Decision D02/19)	Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 2	80% of all requests to	00.4	00.0	0.4.0
weeks of request	be completed within this time period	96.4	93.2	94.8
Within 4	85% of all requests to			
weeks of	be completed within this	98.6	97.5	98.0
request	time period			
Within 8	90% of all requests to			
weeks of	be completed within this	99.3	99.1	99.2
request	time period			
Within 13	95% of all requests to			
weeks of	be completed within this	99.6	99.7	99.7
request	time period			
Within 26	100% of all requests to			
weeks of	be completed within this	99.8	99.9	99.8
request	time period			

Table 35: All Other Connections - Area 3

<sup>&</sup>lt;sup>47</sup> Data reported in this section excludes information regarding in-situ connections. Also, where a customer-introduced delay is recorded, and there is auditable evidence of such, Eircom is required to exclude these Valid Service Orders for the purposes of the performance targets.

#### 8.2 Performance of Eircom with respect to Fault Rate Occurrence

34. This Section presents the rate of line faults reported<sup>48</sup> to Eircom in Area 3. All line faults reported in the specified quarterly period are expressed in relation to the average number of installed lines for the quarter<sup>49</sup>. As ComReg publishes USO performance data on a quarterly basis, the sum of the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured with reference to the total number of line faults<sup>50</sup> for the year and the average number of installed lines for the year.

#### Fault Rate Occurrence

	Q3 2020 Result	Q4 2020 Result	YTD Result (1 July 2020 – 31 Dec 2020)
Line faults per 100 lines	2.3	2.2	4.4

Table 36: Fault Rate Occurrence – Area 3

#### 8.3 Performance of Eircom with respect to Fault Repair Times

35. This Section presents Eircom's performance during the reporting period by providing information on fault repair times in Area 3. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured with reference to the total number of fault repairs for the year.

<sup>&</sup>lt;sup>48</sup> Excluding line faults which have occurred due to vandalism (including theft) and /or third party damage, which have been verified and audited.

<sup>&</sup>lt;sup>49</sup> For Q4 2020, the rate of total faults per 100 lines was 2.5 and the rate of line faults including line faults which have occurred due to vandalism (including theft) and/or third party damage was 2.3.

<sup>&</sup>lt;sup>50</sup> Excluding line faults which have occurred due to vandalism (including theft) and /or third party damage, which have been verified and audited.

#### Fault Repair Times<sup>51</sup>

		Q3 2020 Result %	Q4 2020 Result %	YTD Result (1 July 2020 – 31 Dec 2020)
Within 2 working	Fault repairs completed within	79.3	83.4	81.3
days	this time period			
Within 4	Fault repairs			
working	completed within	92.5	94.2	93.3
days	this time period			
Within 5	Fault repairs			
working	completed within	94.8	96.0	95.4
days	this time period			
Within 10	Fault repairs			
working	completed within	98.8	98.8	98.8
days	this time period			

Table 37: Fault Repair Times – Area 3

#### 8.4 Performance of Eircom with respect to Service Availability

36. This Section shows Eircom's service availability performance during the reporting period by providing information in Area 3. Service availability combines the two parameters of fault occurrence and fault repair as presented above. Schedule 1 of ComReg 19/21a sets out the methodology for calculating and measuring the Service Availability Performance result. Service availability, when measured, will report the maximum working days outage per line. The following table presents the Average Fault Repair Time Performance and the Line Fault Occurrence Performance per 100 lines, both of which contribute to the calculation and measurement of the Service Availability result. As ComReg publishes USO performance data on a quarterly basis, the four quarterly results will be an indication of the annual performance. The actual annual performance will be measured, for compliance purposes, with reference to the average fault repair time for the year and the line fault occurrence for the year.

<sup>&</sup>lt;sup>51</sup> Data pertaining to Fault Repairs with an Agreed Date are included in this metric from 1 July 2010.

#### Service Availability Performance

Sub-National Service Availability Target (ComReg Decision D02/19) 0.607	Q3 2020 Result	Q4 2020 Result	YTD Result (1 July 2020 – 31 Dec 2020)
Average Fault Repair Time Performance	1.7159	1.5727	1.6461
Line Fault Occurrence Performance per 100 lines	2.2567	2.1795	4.4375
Maximum Working Days Outage per line	<u>0.039</u>	<u>0.034</u>	<u>0.073<sup>52</sup></u>

Table 38: Service Availability - Area 3

 $<sup>^{52}</sup>$  If the annual performance (1 July 2020 – 30 June 2021) result is  $\leq$  0.607, the target has been achieved. If the annual performance (1 July 2020 – 30 June 2021) result is > 0.607, the performance target has not been achieved.

### 9 Supplementary Quality of Service Performance Data – Area 3

#### 9.1 Performance of Eircom - Direct Access PSTN Connections

37. This Section presents Eircom's performance during the reporting period by providing information on Supply Time Fastest in Area 3. The information submitted by Eircom are required to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive<sup>53</sup>.

#### Supply Time Fastest<sup>54</sup>

	Q4 2020 Total	Q4 2020 Residential	Q4 2020 Business
Fastest <b>95%</b> - elapsed days	16.0	13.0	35.0
Fastest 99% - elapsed days	45.0	28.0	68.0

Table 39: Direct Access PSTN Connections-Supply Time Fastest – Area 3

#### 9.2 Performance of Eircom - Direct Access PSTN Repair

38. This Section presents Eircom's performance during the reporting period by providing information on Repair Time Fastest in Area 3. The information submitted by Eircom are required to be based on the quality of service parameters, definitions and measurement methods which are set out in the relevant EU Directive<sup>55</sup>.

<sup>&</sup>lt;sup>53</sup> The Universal Service Directive.

<sup>&</sup>lt;sup>54</sup> Data pertaining to connections with an Agreed Date are excluded from this metric as a date can only be agreed for in-situ connections where the customer requests and Eircom agrees to, a deferred installation.

<sup>55</sup> The Universal Service Directive.

#### Repair Time Fastest<sup>56</sup>

	Q4 2020 Total	Q4 2020 Residential	Q4 2020 Business
Fastest 80% completed (working hours)	15.483	15.817	15.417
Fastest 95% completed (working hours)	36.260	40.000	34.267

Table 40: Direct Access PSTN Repairs - Repair Time Fastest - Area 3

#### 9.3 Performance of Eircom - Connections with an Agreed Date<sup>57</sup>

39. This Section presents Eircom's performance in completing fixed-line installations during the reporting period by providing information on performance regarding connections completed by the date agreed with the customer and performance regarding connections with an Agreed Date versus total connections in Area 3.

	Q4 2020 Result %
Connections with an Agreed Date	0

Table 41: Connections with an Agreed Date- Area 3

	Q4 2020 Result %
Connections with an Agreed Date versus Total Connections	0

Table 42: Connections with an Agreed Date v. Total Connections – Area 3

<sup>&</sup>lt;sup>56</sup> Data pertaining to Fault Repairs with an Agreed Date are included in this metric from 1 July 2010.

<sup>&</sup>lt;sup>57</sup> Data relating to this metric relates to customer-introduced delays for in-situ connections. For information, a date can only be agreed for in-situ connections where the customer requests and Eircom agrees to, a deferred installation.

#### 9.4 Performance of Eircom - Fault repairs with an Agreed Date<sup>58</sup>

40. This Section presents Eircom's performance during the reporting period by providing information on fault repairs completed by the date agreed with the customer and performance regarding fault repairs with an Agreed Date versus all repairs in Area 3.

	Q4 2020 Result %
Fault Repairs with an Agreed Date	97.7

Table 43: Fault Repairs with an Agreed Date - Area 3

	Q43 2020 Result %
Fault Repairs with an Agreed Date versus All Repairs	6.7

Table 44: Fault Repairs with an Agreed Date v. All Repairs - Area 3

<sup>&</sup>lt;sup>58</sup> Fault Repairs with an Agreed Date arise when an appointment is required to visit the ccustomer's premises and repair the fault. The Agreed Date means the appointment date and (if applicable) the time that Eircom and a ccustomer have agreed for Eircom to visit a ccustomer's premises in respect of a Fault Repair. In the case of all such Agreed Dates, the Agreed Date is required to be recorded and fully verifiable.

### Appendix: 1 The Universal Service Obligation ("USO")

#### A 1.1 The following ComReg decisions relate to the USO:

- In July 2016, following a public consultation, ComReg designated Eircom as the USP for access at a fixed location ("AFL") until 30 June 2021<sup>59</sup>. This decision sets out requirements regarding the reasonableness of requests for connections and it also sets a target data rate for Functional Internet Access.
- In March 2019, following a public consultation, ComReg set legally binding quality of service performance targets for connections and service availability targets at national and sub-national level for Eircom, as the designated USP with effect from 13 March 2019<sup>60</sup>.
- In December 2020, following a public consultation, ComReg decided that there is no longer a need for the imposition of a payphones USO or the designation of a USP in this regard<sup>61</sup>.

<sup>&</sup>lt;sup>59</sup> "Universal Service Requirements – Provision of access at a fixed location (AFL USO)", Response to Consultation and Decision, ComReg D05/16.

<sup>&</sup>lt;sup>60</sup> "Universal Service Requirements – Provision of access at a fixed location (AFL) – Quality of Service (QoS)" - ComReg Documents 19/21 and 19/21a, D02/19.

<sup>&</sup>lt;sup>61</sup> "Provision of Public Pay Telephones – Universal Service: Scope and Designation", Response to Consultation and Decision, ComReg 20/127, D12/20.

### Appendix: 2 Annual National Quality of Service Targets (D02/19) & Eircom YTD National Performance Results 2020/2021

#### A 2.1 Connections

Quality of Service Performance Metric	Annual National Performance Target (D02/19)	YTD National Result (1 July 2020 – 31 December 2020)
In-situ connections within 24 hours of request	80%	89.9
In-situ connections within 2 weeks of request	99.8%	99.5
In-situ connections within 2 months of request	100%	100.0
All other connections within 2 weeks of request	80%	94.9
All other connections within 4 weeks of request	85%	98.2
All other connections within 8 weeks of request	90%	99.4
All other connections within 13 weeks of request	95%	99.7
All other connections within 26 weeks of request	100%	99.9

Universal Service Requirements – Provision of Access at a Fixed Location (AFL) by Eircom – Quality of Service Performance Data Q4 2020 (1 October – 31 December) & YTD 2020/2021 (1 July 2020 – 31 December 2020) ComReg 21/55

#### A 2.2 Service Availability

Quality of Service Performance Metric	Annual National Performance Target (D02/19)	YTD National Result (1 July 2020 – 31 December 2020)
National Service Availability Target	0.237 maximum Working Days Outage per line	0.083

# Appendix: 3 Annual Area 1 Quality of Service Targets (D02/19) & YTD Area 1 Performance Results 2020/2021

#### A 3.1 Connections

Quality of Service Performance Metric	Annual Area 1 Performance Target (D02/19)	YTD Area 1 Result (1 July 2020 – 31 December 2020)
In-situ connections within 24 hours of request	80%	86.9
In-situ connections within 2 weeks of request	99.8%	98.6
In-situ connections within 2 months of request	100%	100.0
All other connections within 2 weeks of request	80%	95.6
All other connections within 4 weeks of request	85%	98.7
All other connections within 8 weeks of request	90%	99.5
All other connections within 13 weeks of request	95%	99.6
All other connections within 26 weeks of request	100%	100.0

#### A 3.2 Service Availability

Quality of Service Performance Metric	Annual Area 1 Performance Target (D02/19)	YTD Area 1 Result (1 July 2020 – 31 December 2020)
Sub-National Service Availability Target	0.607 maximum Working Days Outage per line	0.043

# Appendix: 4 Annual Area 2 Quality of Service Targets (D02/19) & YTD Area 2 Performance Results 2020/2021

#### A 4.1 Connections

Quality of Service Performance Metric	Annual Area 2 Performance Target (D02/19)	YTD Area 2 Result (1 July 2020 – 31 December 2020)
In-situ connections within 24 hours of request	80%	92.1
In-situ connections within 2 weeks of request	99.8%	100.0
In-situ connections within 2 months of request	100%	100.0
All other connections within 2 weeks of request	80%	93.2
All other connections within 4 weeks of request	85%	97.1
All other connections within 8 weeks of request	90%	99.2
All other connections within 13 weeks of request	95%	99.6
All other connections within 26 weeks of request	100%	100.0

#### A 4.2Service Availability

Quality of Service Performance Metric	Annual Area 2 Performance Target (D02/19)	YTD Area 2 Result (1 July 2020 – 31 December 2020)
Sub-National Service Availability Target	0.607 maximum Working Days Outage per line	0.163

# Appendix: 5 Annual Area 3 Quality of Service Targets (D02/19) & YTD Area 3 Performance Results 2020/2021

#### A 5.1 Connections

Quality of Service Performance Metric	Annual Area 3 Performance Target (D02/19)	YTD Area 3 Result (1 July 2020 – 31 December 2020)
In-situ connections within 24 hours of request	80%	92.0
In-situ connections within 2 weeks of request	99.8%	100.0
In-situ connections within 2 months of request	100%	100.0
All other connections within 2 weeks of request	80%	94.8
All other connections within 4 weeks of request	85%	98.0
All other connections within 8 weeks of request	90%	99.2
All other connections within 13 weeks of request	95%	99.7
All other connections within 26 weeks of request	100%	99.8

#### A 5.2 Service Availability

Quality of Service Performance Metric	Annual Area 3 Performance Target (D02/19)	YTD Area 3 Result (1 July 2020 – 31 December 2020)
Sub-National Service Availability Target	0.607 maximum Working Days Outage per line	0.073