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Wholesale Broadband and Physical Infrastructure Access Markets

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1 Executive Summary

1. This monitoring report provides insights into developments concerning retail and wholesale fixed broadband and related markets since they were last reviewed in ComReg Decision D05/2024¹ (**'2024 WLA/WCA Decision'**) and in the related ComReg Decision D04/2024² (**'2024 PIA Decision'**). In the 2024 WLA/WCA Decision ComReg noted that it would be closely monitoring developments, in particular:

*"ComReg intends to closely monitor market developments over the market review period, and if market outcomes appear to be materially different ComReg may, at its sole discretion decide whether to commence a fresh market review earlier than planned."*³

2. In summary, the trends outlined in 2024 WLA/WCA Decision are continuing and market outcomes are in line with ComReg's analysis as set out in the 2024 WLA/WCA Decision. In particular, with Eircom, NBI, SIRO and Virgin Media (together the Network Operators or **'NO(s)'**) all have increased their fibre-to-the premises (**'FTTP'**) roll-out (and premises coverage) in the period Q2 2023 to Q3 2024. Eircom remains the largest FTTP network, passing 1.3m premises, followed by SIRO (609K premises) NBI (300K premises) and Virgin Media (336K). FTTP take-up rates differ across these NO's FTTP networks, and as of Q3 2024, Eircom had the highest take-up rate at 37%, followed by NBI (32.89%), SIRO (31.39%) and Virgin Media (13.64%)
3. The trends outlined in 2024 WLA/WCA Decision concerning retail fixed line broadband growth and the mix across the various broadband platforms are continuing, with declines in copper, fibre-to-the cabinet (**'FTTC'**) and cable broadband and continued growth in FTTP broadband. Overall, retail service providers' (**'SP(s)'**) broadband market shares have also been relatively stable since the 2024 WLA/WCA Decision.
4. In the Commercial Next Generation (**'NG'**) WLA Market (encompassing FTTC and FTTP), as at Q3 2024, Eircom's market share⁴, at 78% remains high, although it has fallen from 84.1% in Q1 2023. SIRO's and Virgin Media's market share increased over this period, standing at 17.9% and 4.1% respectively. However, when measured in FTTP terms only, Eircom's market share has been

¹ Market Reviews: Wholesale Local Access (**WLA**) provided at a fixed location; Wholesale Central Access (**WCA**) provided at a fixed location for mass-market products, ComReg 24/07, Decision D05/24, 18th January 2024 (**'2024 WLA/WCA Decision'**).

² Market Review: Physical Infrastructure Access (**PIA**) Market Review, ComReg 24/05, D03/24, 18th January 2024 (**'2024 PIA Decision'**).

³ See paragraph 1.21 in the 2024 WLA/WCA Decision. Also of relevance is paragraph 1.39.

⁴ Note market shares include self-supply to an SP's own retail arm (where relevant) and wholesale supply to other SPs).

relatively stable over this period standing at 66.6% (-0.9 p/p) as at Q3 2024, with SIRO's FTTP share declining to 27.3% (-5.3 p/p) and Virgin Media's reaching 6.2%). A range of other metrics have been examined, including the number of premises in the NG WLA Commercial Market that are passed by three NG WLA networks. Over the period from Q1 2023 to Q3 2024 this shows that the number of premises now passed by three NG WLA Networks (FTTC included) has risen from 1.8% of premises in Q1 2023 to 8.1% of premises in Q3 2024 (+6.3 p/p).

5. Applying the cumulative geographic assessment criteria established in the 2024 WLA/WCA Decision⁵ to identify any material changes based on data as of Q3 2024 shows that 10 out of 1,183 Modified Exchange Areas ('**MEAs**')⁶, containing 15,788 premises, pass the cumulative geographic criteria (it was zero MEAs in the 2024 WLA/WCA Decision).
6. Accordingly, trends and developments in the Commercial NG WLA Market are progressing broadly in line with that envisaged under the 2024 WLA/WCA Decision.
7. As regards the wholesale Current Generation ('**CG**') WLA Market, which concerns copper only wholesale broadband, the number of active CG lines continues to decline.
8. With respect to the WCA merchant market, overall, the number of active WCA lines between Q2 2023 and Q3 2024 has increased by 11%. A large component of this growth is accounted for by increases in NBI's WCA active lines over the period.
9. In relation to PIA, data for PIA use shows that the length of duct access provided by Eircom in 2023 stood at 8,671km, an increase from 4,912 km in 2022 with almost all of this (over 98%) being provided to NBI.
10. ComReg intends to publish a further monitoring report in Q1 2026 covering developments for the period from Q4 2024 to Q3 2025.

⁵ See section 4.2.4 below.

⁶ See paragraph 62 below.

2 Introduction

11. This monitoring report provides insights into developments concerning retail and wholesale fixed broadband and related markets since they were last reviewed in ComReg Decision D05/2024⁷ (**'2024 WLA/WCA Decision'**) and in the related ComReg Decision D04/2024⁸ (**'2024 PIA Decision'**). In the 2024 WLA/WCA Decision ComReg noted that it would be closely monitoring developments, in particular, that:

*"ComReg intends to closely monitor market developments over the market review period, and if market outcomes appear to be materially different ComReg may, at its sole discretion decide whether to commence a fresh market review earlier than planned."*⁹

12. ComReg also noted in the 2024 WLA/WCA Decision that:

*"As set out at paragraphs 1.21 and 1.39 above, ComReg has indicated that it intends to closely monitor market developments over the market review period, and if market outcomes appear to be materially different ComReg may, at its sole discretion decide whether to commence a fresh market review earlier than planned. With this in mind, if the Commercial NG WLA Market were to evolve in a way such that the conclusions set out in this Decision would be superseded within the medium term for a significant group of geographic areas or for end users in the market, ComReg will consider whether to commence a fresh market review earlier than planned (and has also not ruled out the potential for the variation of remedies, should it be warranted). Starting in early 2025, ComReg plans to publish annual updates on market conditions, including, where appropriate, a view as to whether it might be appropriate to revisit individual market analyses and/or to adjust remedies."*¹⁰

13. Please note that certain information within this report has been redacted from the public version for reasons of confidentiality and commercial sensitivity, with such redactions indicated by the symbol ✂ and highlighted in BLACK.

⁷ Market Reviews: Wholesale Local Access (**WLA**) provided at a fixed location; Wholesale Central Access (**WCA**) provided at a fixed location for mass-market products, ComReg 24/07, Decision D05/24, 18th January 2024 (**'2024 WLA/WCA Decision'**).

⁸ Market Review: Physical Infrastructure Access (**PIA**) Market Review, ComReg 24/05, D03/24, 18th January 2024 (**'2024 PIA Decision'**).

⁹ See paragraph 1.21 in the 2024 WLA/WCA Decision. Also of relevance is paragraph 1.39.

¹⁰ See paragraph A4.22 in the 2024 WLA/WCA Decision.

2.1 Overview

14. This monitoring report focuses on the wholesale markets for the provision of Current Generation ('CG')¹¹ Wholesale Local Access ('WLA'), Next Generation ('NG')¹² WLA, along with Wholesale Central Access ('WCA'), as defined in the 2024 WLA/WCA Decision and subsequent trends and developments up to Q3 2024.¹³
15. It also gives an overview of developments in the wholesale Physical Infrastructure Access ('PIA') market (dealing with wholesale access to telecommunications specific duct and poles), as defined in the 2024 PIA Decision and subsequent trends having regard to the latest data available to ComReg.

2.2 Background to the 2024 WLA/WCA Decision

16. Before describing the market trends and developments in detail, it is useful to briefly describe the relationship between Network Operators ('NO(s)') and wholesale and retail broadband service providers ('SP(s)').
17. As noted in the 2024 WLA/WCA Decision, there are 4 main¹⁴ fixed broadband NOs that provide retail and/or wholesale broadband services at varying degrees of geographic coverage across the State. These are Eircom¹⁵, National Broadband Ireland ('NBI')¹⁶, SIRO¹⁷ and Virgin Media Ireland¹⁸ ('Virgin Media'). Both Eircom and Virgin Media provide retail and wholesale broadband services, whereas NBI and SIRO only provide wholesale services – that is, they provide wholesale broadband access products to retail SPs, but do not themselves operate at the retail level.

¹¹ In summary, CG WLA corresponds to WLA delivered over copper-only networks, including Local Loop Unbundling ('LLU'), Sub-loop Unbundling ('SLU'), and Line Share ('LS');

¹² NG WLA corresponds to WLA delivered over fibre optic cable networks, including Virtual Unbundled Access ('VUA').

¹³ Since the publication of the 2024 WLA/WCA Decision, some service providers may have corrected data that had been previously provided to ComReg. Additionally, they may have also provided better information on the geographic location of their networks and customers (such as by providing Eircode level information). Such factors can give rise to small changes in data that was historically published by ComReg.

¹⁴ ComReg notes that smaller retail only NOs can exist, however, their broadband network footprints tend to be very small in coverage terms. For example, Magnet (which began reporting broadband network coverage to ComReg in Q2 2024), has FTTP coverage of 13,145 lines as of Q3 2024.

¹⁵ www.eircom.ie.

¹⁶ www.nbi.ie.

¹⁷ www.siro.ie.

¹⁸ www.virginmedia.ie.

18. Retail SPs can therefore provide broadband (and related services) to end users through their own networks; through a combination of using their own networks and the purchase of wholesale broadband services from other NOs, such as in the case of Eircom and Virgin Media; or entirely rely on the purchase of wholesale broadband services from other NOs where they have no network of their own, such as in the case of Vodafone Ireland (**'Vodafone'**)¹⁹ and Sky Ireland (**'Sky'**).
19. Both WLA and WCA are wholesale inputs that are used by SPs in the supply of:
 - (a) Retail broadband and/or other services (including but not limited to Retail Fixed Telephony Services (**'RFTS'**) and television (**'TV'**) services) to end users; and
 - (b) Wholesale services to other SPs.
20. While WLA and WCA services can be provided commercially by NOs, in the case of Eircom, arising from the 2024 WLA/WCA Decision it is required to do so in accordance with its designation as having Significant Market Power (**'SMP'**) in the WLA market and the associated regulatory obligations imposed on it by ComReg.
21. The 2024 WLA/WCA Decision, defined three separate WLA markets, namely:
 - (a) A national CG WLA Market consisting of WLA delivered over copper-only networks, including Local Loop Unbundling (**'LLU'**), Sub-loop Unbundling (**'SLU'**), and Line Share (**'LS'**) (the **'CG WLA Market'**);
 - (b) An Intervention Area (**'IA'**) NG WLA Market including Next Generation (**'NG'**)²⁰ WLA delivered over fibre optic cable networks,²¹ including Virtual Unbundled Access (**'VUA'**), with the geographic scope of this market corresponding to that part of the State falling within the National Broadband Plan (**'NBP'**) IA²² (the **'IA NG WLA Market'**); and
 - (c) A Commercial Area (**'CA'**)²³ NG WLA Market including NG WLA delivered over fibre optic cable networks, including VUA delivered over full or partial fibre optic cable networks in that part of the State falling outside the IA (the **'Commercial NG WLA Market'**).

¹⁹ Note that SIRO is a 50:50 joint venture between ESB and Vodafone Ireland.

²⁰ NG broadband includes technologies with partial or full fibre optic components, namely Fibre to the Cabinet (**'FTTC'**) and Fibre to the Premises (**'FTTP'**).

²¹ Fibre optic cable networks include both FTTC, which consist of a fibre optic and a copper component, and FTTP, which consists of fibre optic components only.

²² NBI is rolling out a FTTP network under the state-funded NBP, with the aim of bringing high speed broadband services to 564,000 premises falling within the designated IA.

²³ The Commercial Area (**'CA'**) consists of all premises other than the premises within the Intervention Area (**'IA'**). The IA and the CA as a consequence were fixed at the time of the 2024 WLA/WCA Decision – see section 4.1 below for further details.

22. Of these three markets, Eircom was found to have SMP in the Commercial NG WLA Market and is subject to a suite of regulatory obligations requiring it to *inter alia* provide other SPs transparent non-discriminatory access to WLA products subject to price control obligations in order to encourage the development of competition in the provision of retail broadband services.
23. No SP was found to have SMP in either the CG WLA Market or the IA NG WLA Market.
24. In the 2024 WLA/WCA Decision, ComReg also assessed the WCA market (which sits downstream from the WLA markets) and decided that continued *ex ante* regulation of that market was no longer warranted, as there was insufficient evidence that retail broadband competition would be harmed by the absence of regulation in that market (including having regard to the presence of regulation of the Commercial NG WLA Market).

2.3 Background to the 2024 PIA Decision

25. The 2024 PIA Decision defined a national market consisting of telecoms-specific Physical Infrastructure ('PI') – namely the ducts, poles and associated facilities such as chambers – that are capable of housing wired Electronic Communications Networks ('ECN(s)'). Such PI is used to support the provision of both wholesale and retail Electronic Communications Services ('ECS(s)') to residential and business users.
26. In the telecoms value chain, PIA is the most upstream input to the provision of ECS services. There are two broad – albeit interlinked – types of demand for PIA, namely SPs who want to roll out mass market broadband services to residential and small businesses, and SPs who want to provide leased line connectivity to medium to large sized businesses, connectivity to mobile base stations and also for fixed network extension. In this context, this monitoring report takes account of the availability and use of PIA to support wholesale and retail broadband services.
27. In the 2024 PIA Decision ComReg found that Eircom had SMP due, *inter alia*, to its ubiquitous telecom-specific PI network which is capable of being used to access almost every premises in the country, and the lack of effective existing or potential competition.

2.4 Broadband Network Operators

28. The broadband platforms of each of the main NOs identified in paragraph 17 above have been deployed across a range of different geographic areas. All four NOs are rolling out and/or upgrading their networks to FTTP.

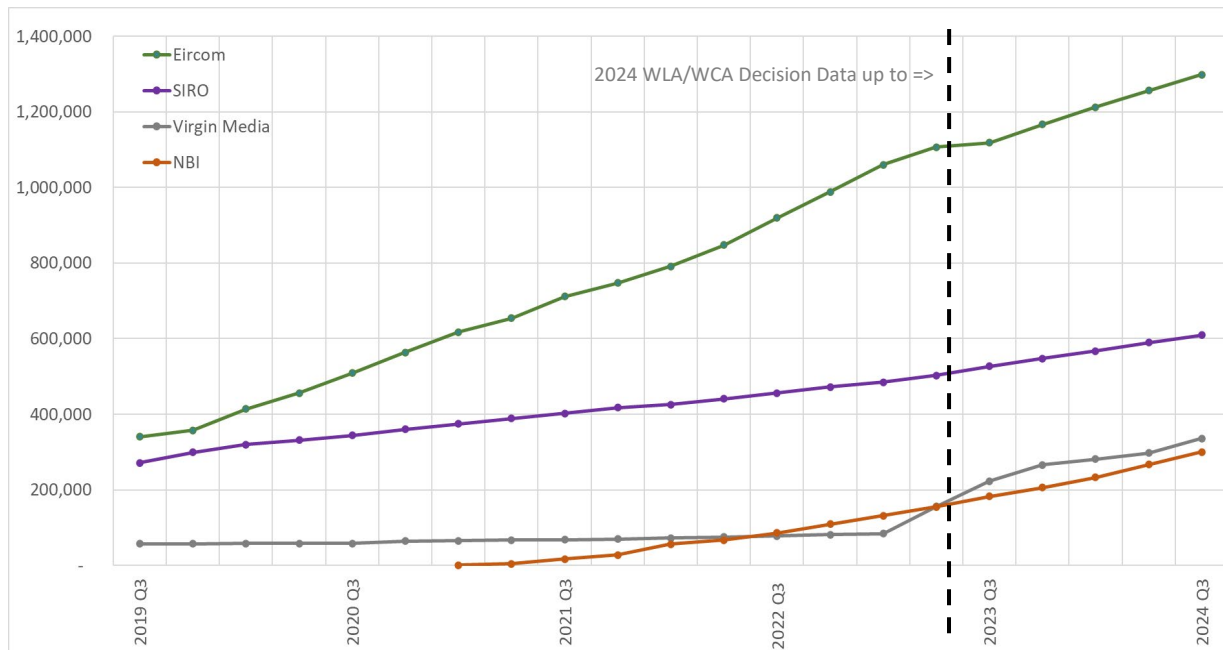
29. Eircom's legacy network platforms (copper and FTTC) were initially deployed collectively nationwide but are gradually being upgraded by Eircom to FTTP, mainly in the Commercial NG WLA Market where it plans to eventually pass some 1.9m premises.²⁴
30. Virgin Media's broadband network covers approximately 900K premises and is mainly present in urban areas across the country, largely falling within the Commercial NG WLA Market. Following an announcement in late 2021²⁵ it has been upgrading its cable television ('**CATV**') network to FTTP.
31. SIRO's deployment of FTTP is occurring in various large and medium sized towns and cities, mainly in the CA and it is aiming to pass 700K premises²⁶ mainly in the Commercial NG WLA Market (a reduction on its previous published 770K target at around the time of the 2024 WLA/WCA Decision).²⁷ Furthermore, NBI is rolling out FTTP in the IA NG WLA Market.
32. FTTP is therefore at various stages of roll-out by all 4 NOs and Figure 1 and Table 1 below shows the trends from the start of 2019 up to Q3 2024, noting that the period Q2 2023 represented the final data point utilised for the purpose of most of the analysis in the 2024 WLA/WCA Decision (being the then latest period for which data was available). In some cases, the latest period of data availability was Q1 2023 and this is highlighted where relevant. Table 2 sets out NOs' roll-out expressed as a percentage of their announced overall planned roll-out targets.

²⁴ See <https://www.eir.ie/opencms/export/sites/default/.content/pdf/IR/news/eir-Q3-24-PRESS-RELEASE-VF.pdf>.

²⁵ See <https://www.virginmedia.ie/about-us/press/2021/virgin-media-ireland-announces-national-fibre-network-upgrade/>.

²⁶ See <https://siro.ie/news-and-insights/siro-expands-full-fibre-broadband-to-cobh/>.

²⁷ See <https://siro.ie/roll-out/>.

Figure 1: Rollout of FTTP by Network Operators Q3 2019 to Q3 2024**Table 1: Incremental FTTP Rollout by Period**

Year / Network Operator	Q2 2019 to Q2 2020	Q2 2020 to Q2 2021	Q2 2021 to Q2 2022	Q2 2022 to Q2 2023	Q2 2023 to Q2 2024	Q2 2024 To Q3 2024	Total Roll-out as at Q3 2024
Eircom	150,599	98,329	193,923	258,604	149,592	42,668	1,298,848
NBI	-	4,311	62,472	87,656	112,544	33,197	300,180
SIRO	81,261	57,302	52,284	61,075	86,910	20,131	609,211
Virgin Media	3,406	8,677	8,109	81,322	141,421	38,278	335,671

Table 2: Percentage Roll-Out Target Achieved

Network Operator	Announced FTTP Rollout Premises Target	FTTP Rollout Target % Achieved Q3 2024	Announced Completion Date
Eircom	1.9m	68%	2026
NBI	564k	53%	2027
SIRO	700K ²⁸	87%	2026
Virgin Media	980K	34%	Not stated

33. As at Q3 2024 Eircom had the largest FTTP network, passing nearly 1.3 million premises, with an additional 192,260 premises passed with FTTP since Q2 2023. Its target is to pass 1.9m premises by 2026 and as of Q3 2024 had achieved approximately 68% of this target²⁹.

²⁸ In public statements, SIRO's FTTP coverage target has reduced from 770K premises to 700K premises.

²⁹ See https://www.eir.ie/opencms/export/sites/default/_content/pdf/IR/news/eir-Q2-24-PRESS-RELEASE-VF.pdf page 2.

34. SIRO passed just over 609K premises as at Q3 2024, having passed an additional 107,041 premises since Q2 2023. It is intending to pass 700k premises by 2026³⁰ and as of Q3 2024 had achieved approximately 68% of this target and ComReg notes that this figure represents a reduction from the 770K premises target previously announced by SIRO and referenced in the 2024 WLA/WCA Decision³¹.
35. Virgin Media had passed just over 335K premises as at Q3 2024 with an additional 179,699 premises passed with FTTP since Q2 2023. Its target is to pass approximately 980K premises with FTTP and as of Q3 2024 had achieved approximately 34% of this target. While there is no current publicly stated timeframe for the completion of its network upgrade, at the time of the 2024 WLA/WCA Decision ComReg noted that Virgin Media's initial FTTP upgrade announcement in November 2021 stated that it expected to complete its network upgrade within three years. i.e., by the end of 2024. However, ComReg's view in 2024 WLA/WCA Decision was that Virgin Media's FTTP network upgrade was not likely to be completed until towards the end of the market review period.³² Virgin Media's FTTP roll-out progress so far suggests that this remains the case (although as evidenced in Figure 1 and Table 1 its roll-out can vary significantly across periods).
36. NBI passed just over 300K premises as at Q3 2024, with an additional 145,751 premises passed with FTTP since Q2 2023. NBI is contracted by Government to pass 564k premises in IA by 2027³³. As set out in 7 below, NBI is the predominant user of regulated access to Eircom's PIA to roll-out its FTTP network.
37. ComReg also notes the recent announcement by NBI that it intends, by bringing forward some of its roll-out, to provide FTTP broadband coverage earlier than intended to 65,000 premises in the IA³⁴.
38. Noting the above, FTTP roll-out is progressing broadly in line with that envisaged under the 2024 WLA/WCA Decision. Although as noted, SIRO's FTTP roll-out target has reduced from 770K premises to 700K premises.
39. Table 3 below looks at FTTP take-up rates by NO, which is derived by dividing, at an individual NO level, active FTTP lines by the total premises passed by that NO (measured by lines).³⁵

³⁰ See <https://SIRO.ie/news-and-insights/SIRO-full-fibre-broadband-goes-live-in-crosshaven/>.

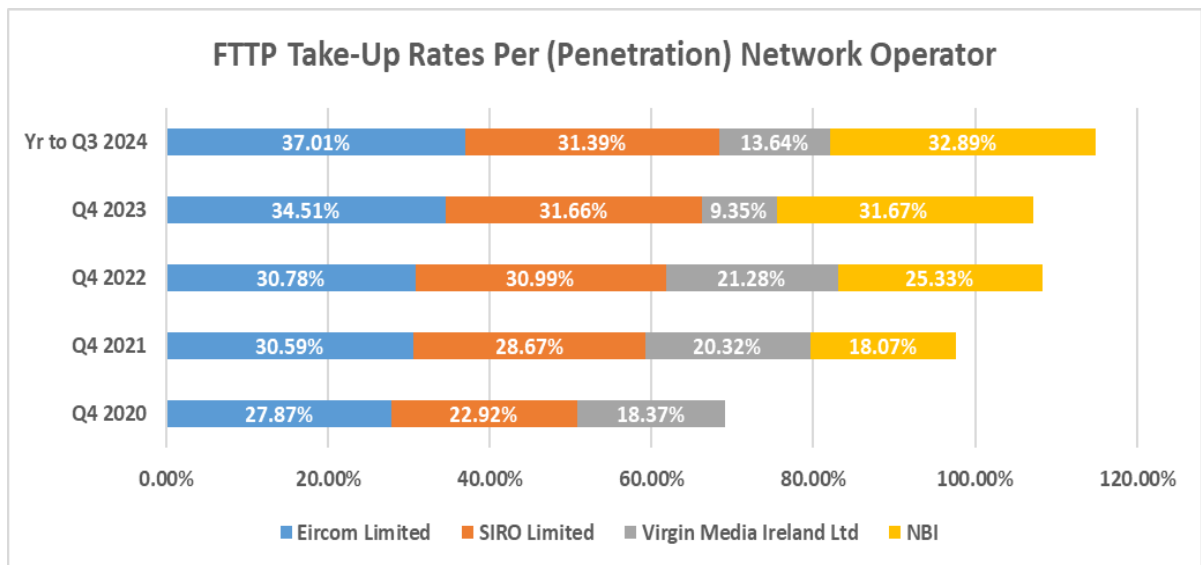
³¹ See paragraph 5.306 of the 2024 WLA/WCA Decision.

³² See paragraph 5.312 of the 2024 WLA/WCA Decision.

³³ Page 5 of the 'National Broadband Plan – Independent Interim Evaluation Report', <https://www.gov.ie/en/publication/aa255-national-broadband-plan-independent-interim-evaluation-report/>.

³⁴ See <https://nbi.ie/news/events/2025/01/07/65000-premises-to-get-fibre-broadband-earlier-than-expected/>.

³⁵ Each row is the take up at the year end, with the exception of 2024 which it to the end of Q3 2024.

Table 3: FTTP Take-up Per NO

40. Table 3 shows that the take-up rates for NOs, with the exception of Virgin Media, have increased from 2020.
41. As of Q3 2024 Eircom had the highest FTTP take-up rate at 37.01% (up from 27.87% in Q4 2020). In Q3 2024 NBI and SIRO had FTTP take up rates of 32.89% and 31.39% respectively, while Virgin Media's FTTP take up rate has seen upward and downward changes over time and stood at 13.64% in Q3 2024.

3 Fixed Retail Broadband Trends and Developments

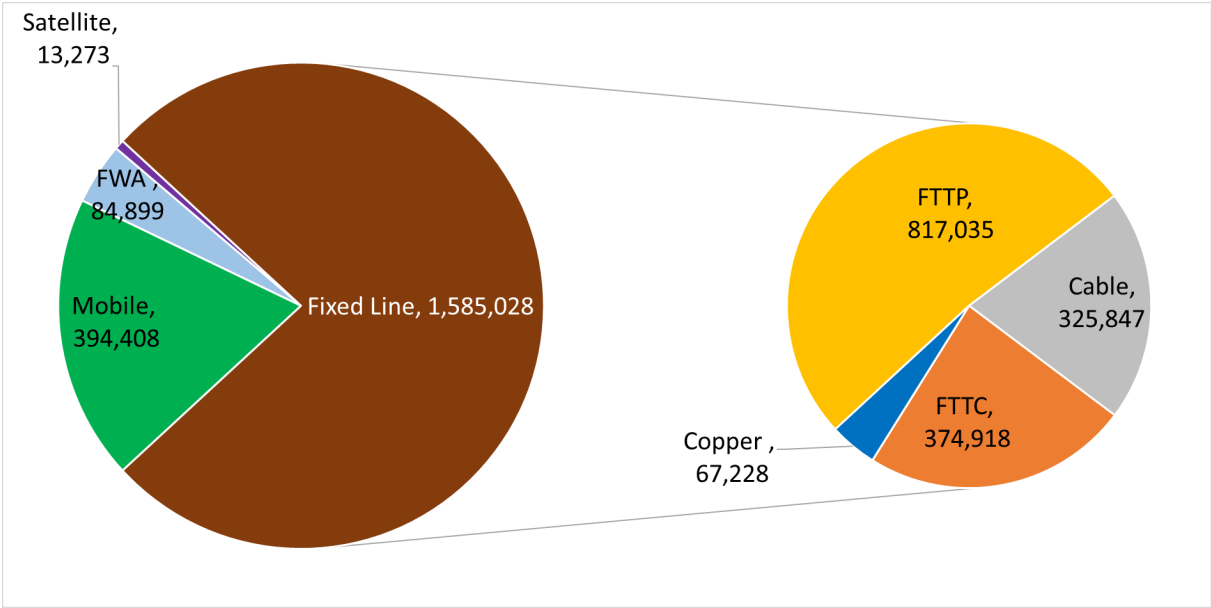
3.1 Introduction

42. In the 2024 WLA/WCA Decision³⁶, while not required to conclude on, or precisely define the scope of, the retail market, ComReg analysed it as it informed its subsequent analysis of the WLA and WCA markets. ComReg determined that the retail broadband market comprises two markets:
 - (a) A national Current Generation ('**CG**') retail broadband market ('**CG Retail Broadband Market**') consisting of retail broadband provided over Eircom's copper-only network; and
 - (b) A national Next Generation ('**NG**') retail broadband market ('**NG Retail Broadband Market**'), consisting of retail broadband provided using Network Operator FTTx (being FTTC and FTTP) inputs on either a merchant market or a self-supply basis; and retail broadband provided over Virgin Media's cable network.
43. ComReg's assessment in the 2024 WLA/WCA Decision also concluded that mobile broadband, Fixed Wireless Access ('**FWA**') broadband, satellite broadband and other services did not fall within the scope of the above defined retail broadband markets.
44. Noting the above, ComReg provides an update on the main trends and developments in the CG Retail Broadband Market and NG Retail Broadband Market (collectively, retail broadband markets). In doing so, ComReg updates the trends over the period Q2 2023 to Q3 2024, noting that the period Q2 2023 typically represented the final data point utilised for the purpose of the retail analysis in the 2024 WLA/WCA Decision and for which data is available³⁷. Trends are identified in the supply of and demand for fixed broadband over various broadband platforms, fixed line broadband demand, along with an overview of the NOs providing broadband on these platforms and the associated retail broadband providers.
45. As illustrated in Figure 2, fixed (or wired) broadband lines represented over three quarters of all broadband lines in Q3 2024.

³⁶ See section 4 of the 2024 WLA/WCA Decision.

³⁷ As gathered quarterly by ComReg from SPs using its statutory information gathering powers.

Figure 2: Number of all broadband subscriptions (measured by lines) by platform, Q3 2024



3.2 Fixed Line Broadband Demand and Platform Mix

46. As noted above, there are 4 fixed line broadband platforms over which retail broadband services are provided, namely over, copper, FTTC, cable and FTTP platforms. CG retail broadband is provided over copper networks, while NG retail broadband is provided over FTTC, FTTP and cable networks.

Figure 3: Number of Fixed Broadband Lines by Platform, Q3 2019 to Q3 2024

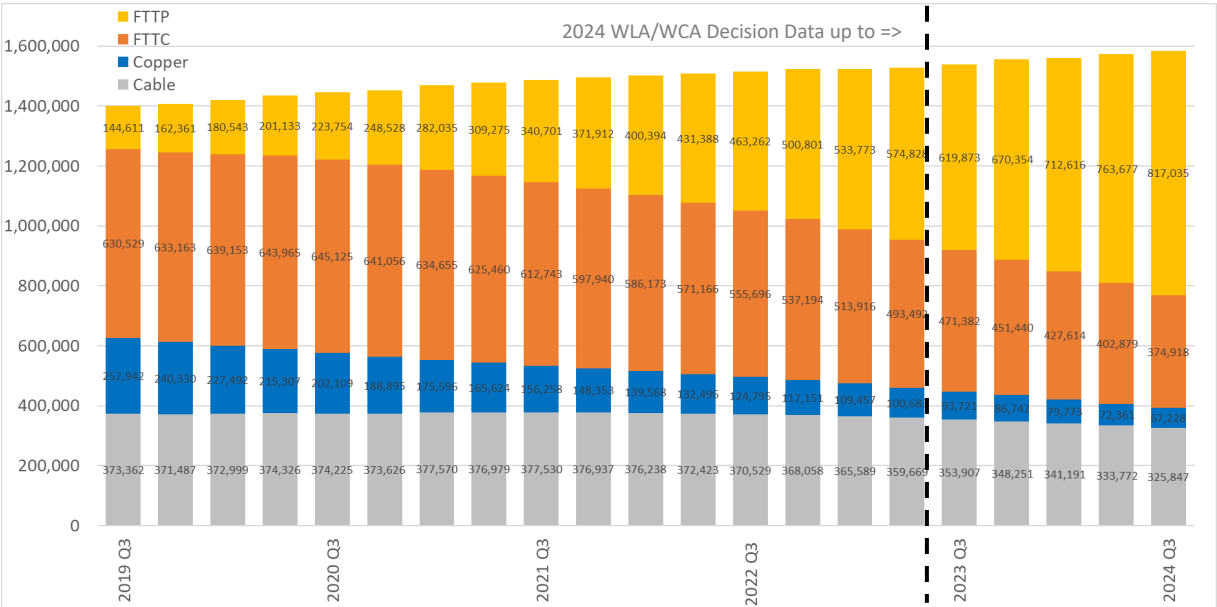
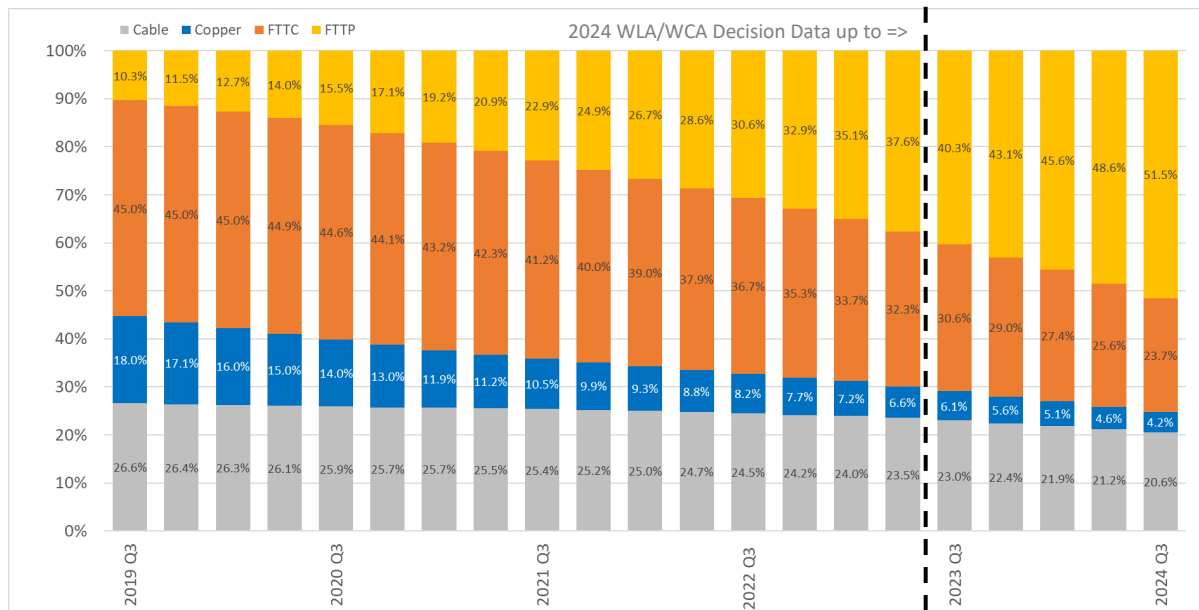


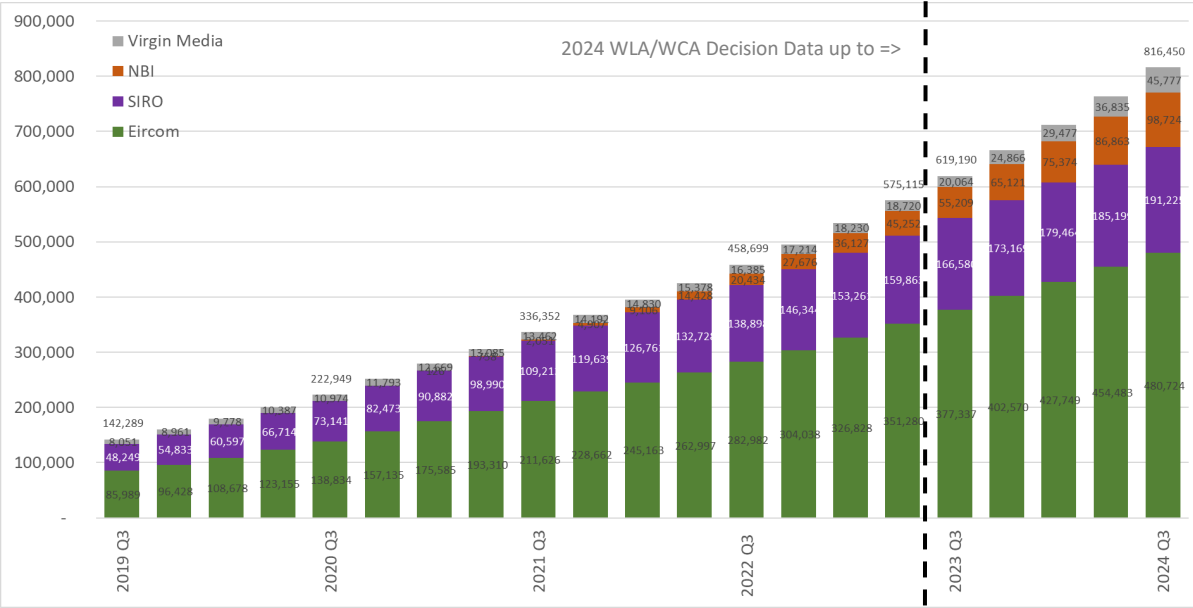
Figure 4: Percentage share of Fixed Broadband lines by platform Q3 2019 to Q3 2024

47. Figure 3 and Figure 4 above show the broad trends in the consumption of fixed line retail broadband over the period Q3 2019 to Q3 2024. In the 2024 WLA/WCA Decision it was noted that fixed line retail broadband lines stood at 1.529m lines as at Q2 2023, and as evidenced in the figures above, growth has continued, increasing by a further 3.7% to 1.585m lines since then.
48. In terms of the percentage of lines falling within each type of broadband platform, the trends identified in the 2024 WLA/WCA Decision have continued, namely:
- Over the period Q3 2019 to Q2 2023 the percentage of fixed broadband lines provided over FTTP increased from 10.3% to 37.6%, with this having increased by a further 13.9 percentage points ('p/p') to 51.5% as at Q3 2024.
 - Over the period Q3 2019 to Q2 2023 the percentage of fixed broadband lines provided over FTTC fell from 45% to 32.3%, with this having fallen by a further 8.6 p/p to 23.7% as at Q3 2024.
 - Over the period Q3 2019 to Q2 2023 the percentage of fixed broadband lines provided over cable fell from 26.6% to 23.5%, with this having fallen by a further 2.9 p/p to 20.6% as at Q3 2024.
 - Over the period Q3 2019 to Q2 2023 the percentage of fixed broadband lines provided over copper fell from 18% to 6.6%, with this having fallen by a further 2.4 p/p to 4.2% as at Q3 2024.
49. The above shows that the trends outlined in the 2024 WLA/WCA Decision concerning fixed line broadband growth and the mix across the various broadband platforms are continuing, with declines in copper, FTTC and cable broadband and continued growth in FTTP broadband.

3.2.1 Retail FTTP Developments

50. ComReg now considers developments with respect to FTTP. In terms of FTTP subscribers, Figure 5 below sets out the number of active FTTP retail subscriber lines by NO³⁸, with Figure 6 expressing this in percentage terms. Overall, the number of active FTTP lines has continued to grow, rising from 575K lines in Q2 2023 to just over 816K lines in Q3 2024.

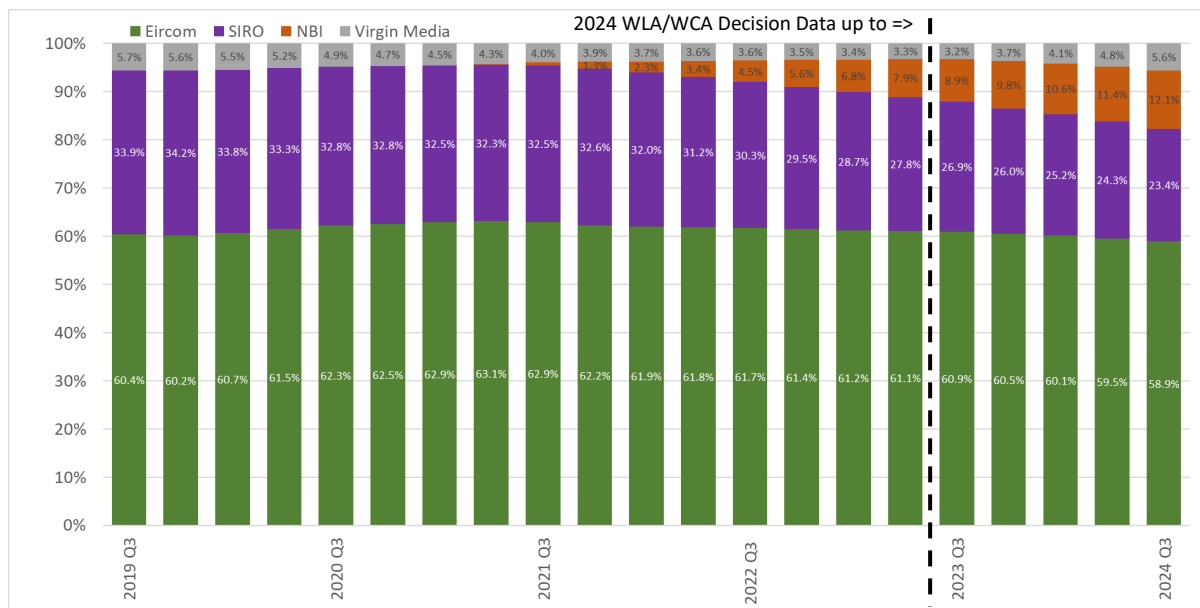
Figure 5: Number of Active Retail FTTP Broadband Lines, by Network Operator, Q3 2019 to Q3 2024³⁹



³⁸Where the NO offers both retail and wholesale services both are captured.

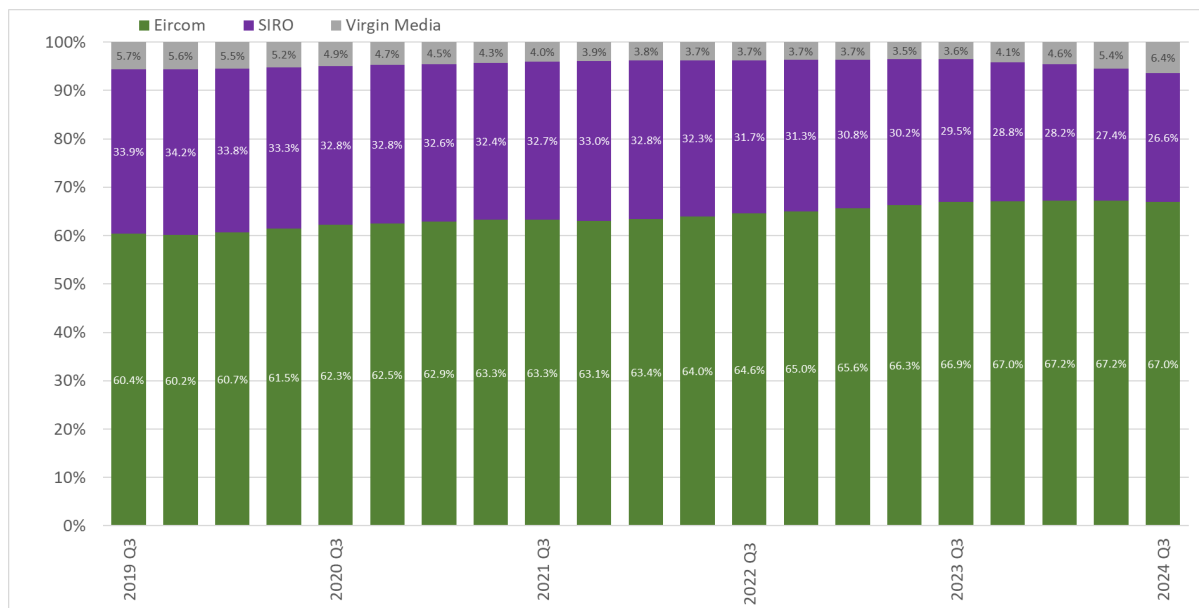
³⁹ Note, Magnet networks, which began reporting active FTTP lines in Q2 2024, is excluded from this figure. Magnet had 1,469 active FTTP lines as at Q3 2024.

Figure 6: National Level Percentage Shares of Active Retail FTTP Broadband Lines, by Network Operator, Q4 2019 to Q3 2024

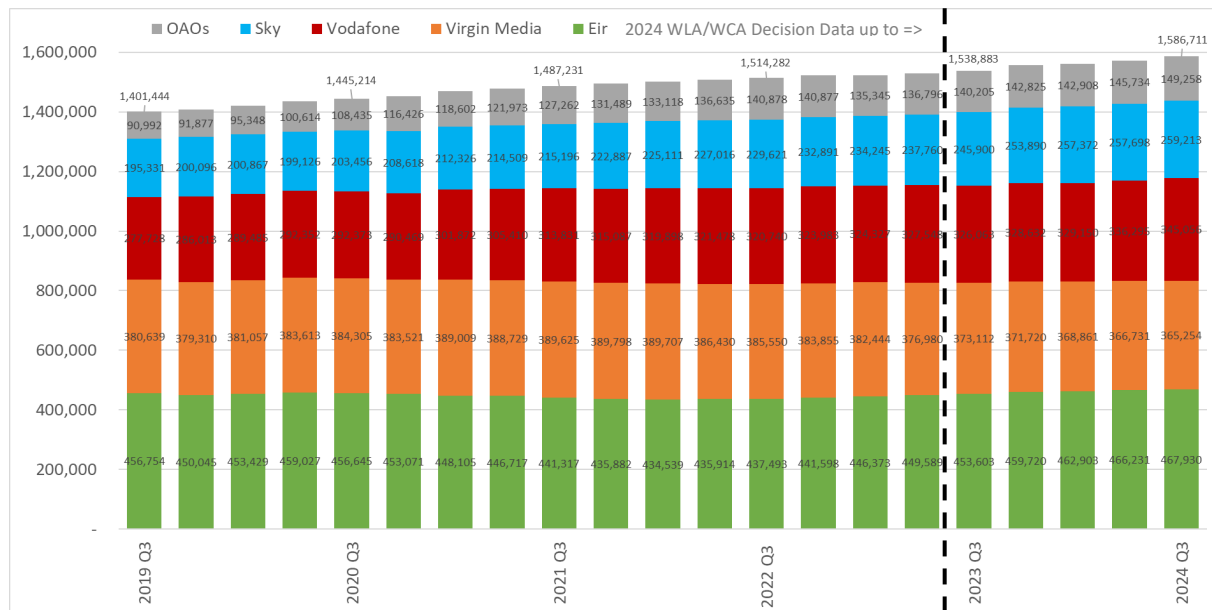
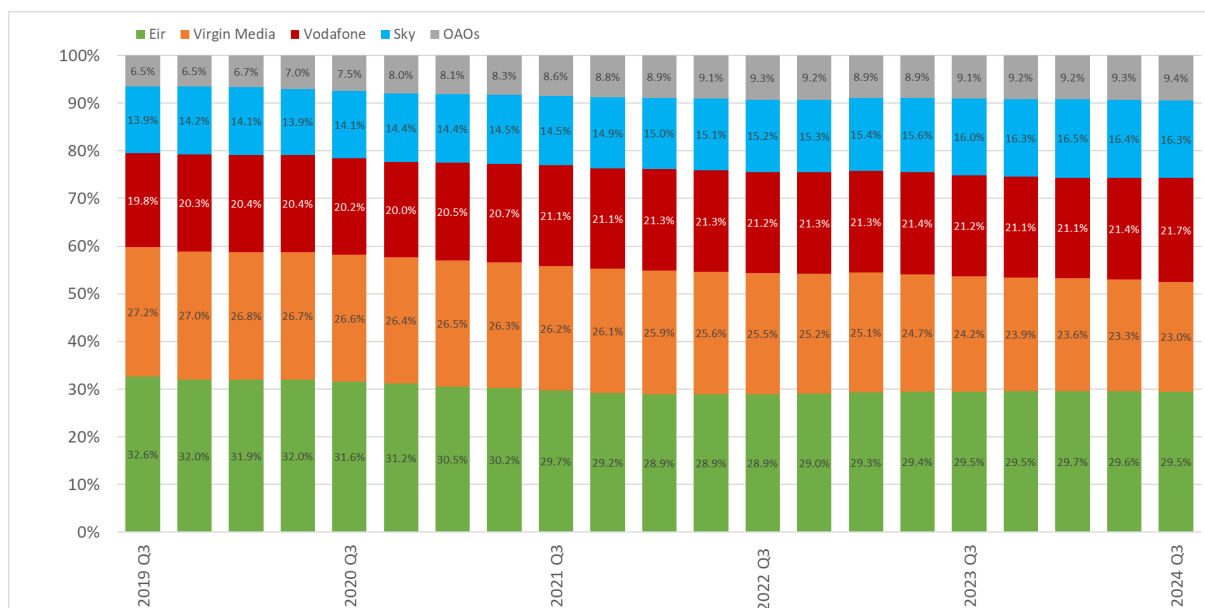


51. Figure 6 above shows that as at Q3 2024 Eircom, at 58.9%, continues to have the largest share of FTTP subscribers on its network having declined from 60.9% at the end of Q3 2023 (61.1% in Q2 2023). SIRO's FTTP market share stood at 23.4% as at Q3 2024, having declined from 26.9% at the end of Q3 2023 (and from 27.8% in Q2 2023).
52. NBI's share of active FTTP broadband lines on its network has increased from 8.9% in Q3 2023 (7.9% in Q2 2023) to 12.1% in Q3 2024. Virgin Media's share stood at 5.6% in Q3 2024 having risen from 3.2% in Q3 2023 (also 3.3% at Q2 2023).
53. As NBI is rolling out to premises in the IA, being an area that is, in general, not considered to be economically viable for commercial FTTP deployment, a better barometer of FTTP market dynamics outside the IA would be to consider the position of Eircom, SIRO and Virgin Media only (although we recognise that these NOs can have some active lines in the NBP IA). This is because, the NBP IA is not likely, on a forward looking basis, to be materially serviced on the networks of commercial operators.

Figure 7: Percentage Share of Active Retail FTTP Broadband Lines by Network Operator, Q3 2019 to Q3 2024, Eircom, SIRO and Virgin Media Only



54. Figure 7 above – which excludes NBI – shows that as at Q3 2024, Eircom had a 67% share of FTTP subscribers on its network with this being broadly stable with its position at the end of Q3 2023 (and up from 66.3% in Q2 2023). SIRO's share stood at 26.6% as at Q3 2024, having declined from 29.5% at the end of Q3 2023 (30.2% at Q2 2023). Virgin Media's share stood at 6.4% in Q3 2024 having increased from 3.6% in Q3 2023 (3.5% at Q2 2023).
55. Overall, since the 2024 WLA/WCA Decision, Eircom's FTTP market share outside of the IA has marginally increased (+0.7 p/p), while SIRO has seen a 3.6 p/p decrease over the same period, with Virgin Media's FTTP share showing a 2.9 p/p increase.
56. Figure 8, below, shows the number and share of fixed broadband retail lines by retail operator, across copper, FTTC, FTTP and Cable broadband platforms, over the period Q3 2019 to Q3 2024.

Figure 8: Number of Retail Fixed Broadband Lines by Retail SP, Q3 2019 to Q3 2024**Figure 9: Percentage Share of Retail Fixed Broadband Lines by Retail SP, Q3 2019 to Q3 2024**

57. As can be seen, over 90% of all fixed broadband lines are provided by 4 retail operators, namely Eircom, Virgin Media, Vodafone and Sky, with the remainder provided by a number of Other Operators ('OO(s)').
58. In Q2 2023, Eircom had a market share of 29.4% of all fixed broadband retail lines followed by Virgin Media at 24.7%, Vodafone at 21.4% and Sky at 15.6%. At Q3 2024 the market shares of these SPs have remained relatively unchanged, save for Virgin Media whose share has fallen by 1.7 p/p to 23%.

3.3 Conclusions on Fixed Retail Broadband Trends and Developments

59. Overall, retail market developments are broadly in line with the trends identified in the 2024 WLA/WCA Decision.
60. In this respect, there has continued to be a migration to fibre based services with FTTP being the most widely used platform in the State.
 - (a) FTTP, at 51.5% of all fixed broadband lines, is now the largest platform, having grown by 13.9 p/p since Q2 2023.
 - (b) FTTC and CATV based broadband lines have declined to a 23.7% and 20.6% share respectively of all fixed broadband lines, and
 - (c) CG broadband provided over copper now constitutes just 4.2% of total broadband lines.
61. In looking at the FTTP broadband platform only, when considering all NOs shares, Eircom's network share of FTTP lines has declined by 2.2 p/p to 58.9% over the period Q2 2023 to Q3 2024, and Eircom remains the largest NO. SIRO's network share has declined by 4.4 p/p to 23.4%, with Virgin Media and NBI increasing to 4.8% (+1.5 p/p) and 11.4% (+3.5 p/p) respectively.
62. However, when excluding FTTP lines on NBI's network (with activity excluding developments in the NBP IA being a better barometer of activity in the commercial element of the retail market), over the period Q2 2023 to Q3 2024 Eircom's FTTP network market share increased marginally to 67% (+0.7pp), SIRO's declined to 26.6% (down 3.6p/p), and Virgin Media's market share increased to 6.4% (+2.9 p/p).
63. Overall, Retail SPs' broadband market shares have also been relatively stable since the 2024 WLA/WCA Decision.

4 WLA Broadband Market Trends and Developments

4.1 Introduction

64. As set out earlier, retail broadband and the WLA/WCA markets are vertically related, with the delivery of retail broadband services often underpinned by SPs using their own networks and/or purchasing regulated and/or commercially provided wholesale broadband services to do so. As set out in Section 2.2 above, in the 2024 WLA/WCA Decision ComReg identified and defined a national CG WLA Market, an IA NG WLA Market and a Commercial NG WLA Market.
65. In the 2024 WLA/WCA Decision, the unit used to define the geographic scope of the NG WLA markets is the Modified Exchange Area(s) (**'MEA(s)'**).⁴⁰ In this respect, Commercial Area Exchange Areas (**'EA(s)'**) effectively consist of all the premises in an EA but removing those premises that formed part of the National Broadband Plan (**'NBP'**). IA EAs are the premises within an EA that fall within the NBP IA, with this being fixed in the 2024 WLA/WCA Decision.
66. In this respect, in the 2024 WLA/WCA Decision ComReg noted, based on the experience to date, that specific premises can be both added and removed from the NBP IA and that there was no way of identifying in advance which premises would move (this can happen because, for example, premises originally designated as falling within the NBP IA are removed because the premises are served commercially). Therefore, having regard to the need to provide regulatory certainty, the 2024 WLA/WCA Decision fixed the geographic boundaries of both the IA NG WLA Market and the Commercial NG WLA Market (notwithstanding any subsequent changes that may happen to the NBP IA footprint).⁴¹ Therefore, the IA NG WLA Market consists of the 486,720 Eircodes that were part of the NBP as at end of Q1 2023. Premises other than these 486,720 premises, including additional premises that are built or may be built on a forward-looking basis, are included in the Commercial NG WLA Market. Data and information presented in this monitoring report with respect to the WLA markets has been calculated on this basis.

4.2 Commercial NG WLA Market

67. Below, ComReg sets out trends and developments in the NG WLA markets with respect to market shares, insights into the number of NOs having coverage at a premises level, alongside information concerning FTTP coverage generally.

⁴⁰ See Annex 12 of the 2024 WLA/WCA Decision for details on how these markets were defined.

⁴¹ See paragraph A12.35 of the 2024 WLA/WCA Decision.

68. In the 2024 WLA/WCA Decision, the last data point used for the purpose of calculating NG WLA market shares was Q1 2023. As such, comparisons below are referenced to that time period. The retail CGA and WCA data in the 2024 WLA/WCA Decision are based on Q2 2024 data.

4.2.1 Market Shares

69. In the period since Q1 2023 to Q3 2024 the number of premises in the Commercial NG WLA Market at which active NG WLA services are provided has increased by 80,397 premises, rising from 953,199 to 1,033,596⁴². In that time, as of Q3 2024, SIRO added a net 35,826 active NG WLA lines, Eircom a net 18,441 active NG WLA lines⁴³ and VM a net 25,633 NG WLA lines.⁴⁴
70. Figure 10 below shows the change in market shares since the data points used in the 2024 WLA/WCA Decision (Q1 2023 to Q3 2024) taking account of FTTC and FTTP NG WLA lines. It should be noted that Virgin Media only commenced offering NG WLA services to other SPs in late Q4 2023 (and at very low levels), and it is only at this point that data on its services is relevant. Virgin Media's active NG WLA lines showing in Figure 10 as commencing at Q4 2023 include historical FTTP lines Virgin Media would have supplied for its own use over its historical Radio Frequency Over Glass ('RFOG') network⁴⁵ which was not capable of supporting NG WLA services (its FTTP network is now based on XGS PON technology). In view of this, the figures shown do not represent growth in NG WLA services relative to previous periods.
71. Eircom's NG WLA market share, including FTTC, has decreased by 6.1 p/p from 84.1% to 78.0% while SIRO's has increased from 15.9% to 17.9% (2 p/p) and Virgin Media's increased to 4.1% after entering the market in Q4 2023.

⁴² It is important to note that some SPs retail customer locations are unknown due to deficiencies in the data provided. This relates primarily to FTTC retail customers, albeit some are FTTP. It is important to note that some SPs retail customer locations are unknown due to deficiencies in the data provided. This relates primarily to FTTC retail customers albeit some are FTTP. However, it is known (based on lines with geographic data) that on average, 94.3% of lines are in the CA with the other 5.7% in the IA. In Q3 2024, there were 52,757 unassigned lines (no geographic identifiers provided for these lines), and 49,761 of them are estimated to be part of the NG WLA Commercial Market. .

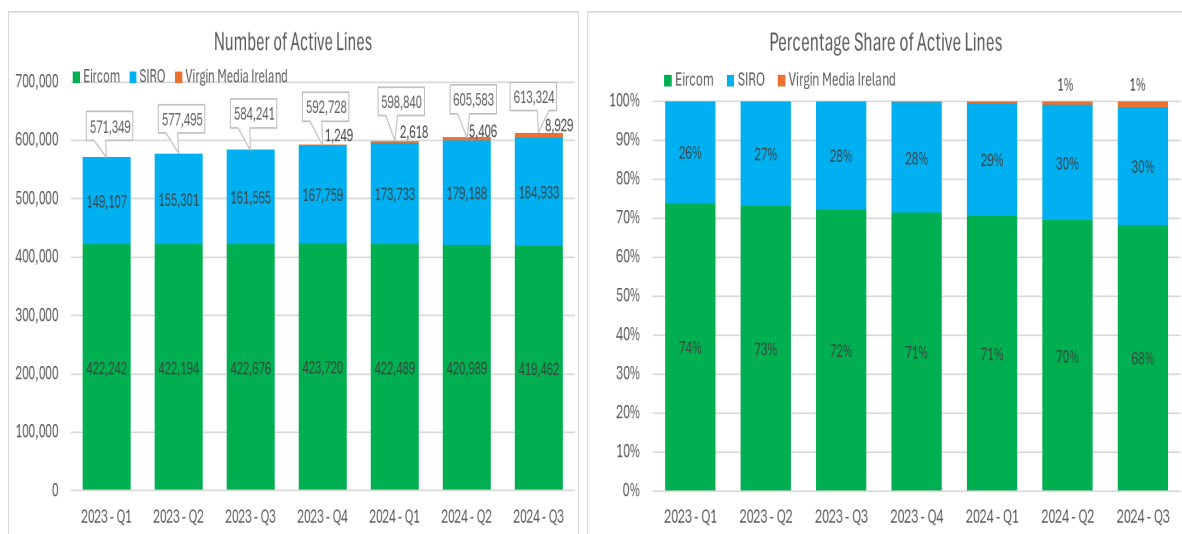
⁴³ Eircom's FTTP WLA lines grew by 142,756 lines over the period, while its FTTC WLA lines fell by 124,315 lines.

⁴⁴ NBI had 497 active NG WLA lines in the CA as of Q3 2024. Given its small number we do not present information on this. As set out in paragraph 58 above, the Commercial NG WLA Market was fixed at the time of the 2024 WLA/WCA Decision. Given NBI has active lines in this market this is attributable to additional premises being included in the NBP IA.

⁴⁵ See paragraph 3.43 of the 2024 WLA/WCA Decision.

Figure 10: Commercial NG WLA Market – Network Operator Market Shares⁴⁶

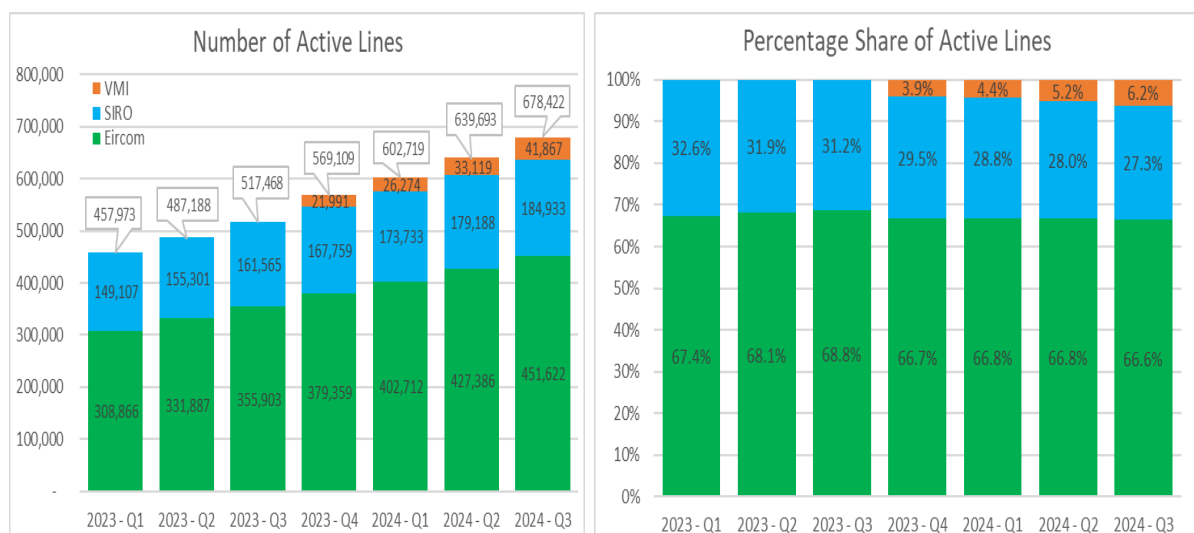
72. Figure 11 below shows the wholesale only supply in the Commercial NG WLA Market, i.e., excluding self-supply for own retail use.

Figure 11: Wholesale only supply in the Commercial NG WLA Market

⁴⁶ Note, figures/market shares for NBI are not visible on the charts given they are very low. NBI had 497 active FTTP NG WLA lines in the Commercial NG WLA Market as at Q3 2024.

73. As can be seen in the above charts, the total number of wholesale only lines in the Commercial NG WLA Market has grown from 571,349 in Q1 2023 to 613,324 in Q3 2024. This is a growth rate of 7.3% over this period. Eircom has seen a slight decline in its number of active lines sold to other operators falling from 422,242 in Q1 2023 to 419,462 in Q3 2024, with its market share of wholesale only active lines having declined from 74% to 68%. SIRO, on the other hand, who is a wholesale only NO, saw growth in the number of its active line sales, rising from 149,107 in Q1 2023 to 184,933 in Q3 2024. This has resulted in SIRO's market share of total wholesale only sales growing from 26% in Q1 2023 to 30% in Q3 2024. Finally, Virgin Media Ireland commenced offering wholesale services in Q4 2023 and had 8,929 active lines in Q3 2024, representing 1% of total wholesale sales in Q3 2024.
74. Looking at market shares solely for FTTP NG WLA, Figure 12 below shows the number of active FTTP NG WLA lines (both self-supply and wholesale supply) and the corresponding market shares for Eircom, SIRO and Virgin Media in the Commercial NG WLA Market.

Figure 12: FTTP Shares in the Commercial NG WLA Market⁴⁷



75. The total number of active FTTP WLA lines has grown from 457,973 to 678,422 in the period Q1 2023 to Q3 2024, an increase of 220,449 lines. In particular, Eircom has increased its active FTTP lines from 308,866 lines to 451,622 lines over this period, accounting for 66.6% of all FTTP subscribers in the Commercial NG WLA Market. Similarly, SIRO added 35,826 active FTTP lines with its market share at 27.3% and Virgin Media since having 41,867 FTTP active lines, accounting for 6.2% as of Q3 2024⁴⁸.

⁴⁷ NBI figures/shares are not visible in this Figure given they are very low. NBI had 497 active FTTP NG WLA lines in the Commercial NG WLA Market as at Q3 2024 (representing 0.05% of all lines).

⁴⁸ As noted in paragraph 65, this figure includes historical FTTP lines Virgin Media would have supplied for its own use over its historical Radio Frequency Over Glass ('RFOG') network.

76. Overall, in the period Q1 2023 to Q3 2024 Eircom lost 6.1 p/p in market share when measured in terms of FTTC and FTTP, with SIRO and Virgin Media's share increasing by 2 p/p and 4.1 p/p respectively. However, in FTTP only terms Eircom's market share has been relatively stable having decreased marginally by 0.8 p/p over this period, with SIRO declining by 5.3 p/p and Virgin Media's market share reaching 6.2%.

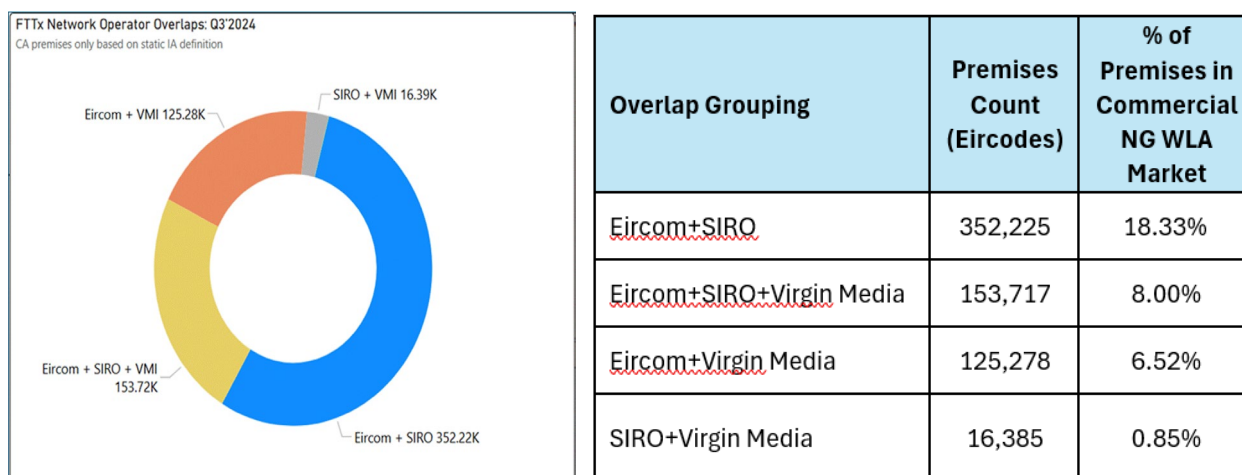
4.2.2 Network Overlaps

77. ComReg now considers changes in NG WLA coverage within the Commercial NG WLA Market over the period Q1 2023 to Q3 2024, with this market covering approximately 1.92m premises.
78. Within this market, Eircom's NG WLA (FTTC or FTTP) network presence is considered ubiquitous, although as noted in section 2.4 above, its FTTP coverage passes just under 1.3m premises nationally.
79. In order to examine overlaps, using Eircode data provided by NOs on the premises passed by their networks, we identify if there is any premises where more than one NG WLA service is available, i.e., the networks overlap and with whom. These overlaps are then categorised based on the specific network, with each category being mutually exclusive.
80. Eircom's FTTP coverage in the Commercial NG WLA Market is 63.4% of premises as at Q3 2024, having risen from 54.09% in Q1 2023.
81. Only SIRO's and Virgin Media's FTTP NG WLA services fall within the Commercial NG WLA Market, with Virgin Media's CATV broadband services/network excluded^{49, 50}. In view of this, only Virgin Media's FTTP coverage is considered below. Figure 13 below shows the number of known addresses with overlapping NG WLA networks at Q3 2024, i.e., those with Eircodes that have more than one network available in the Commercial NG WLA Market. Each grouping is mutually exclusive.⁵¹

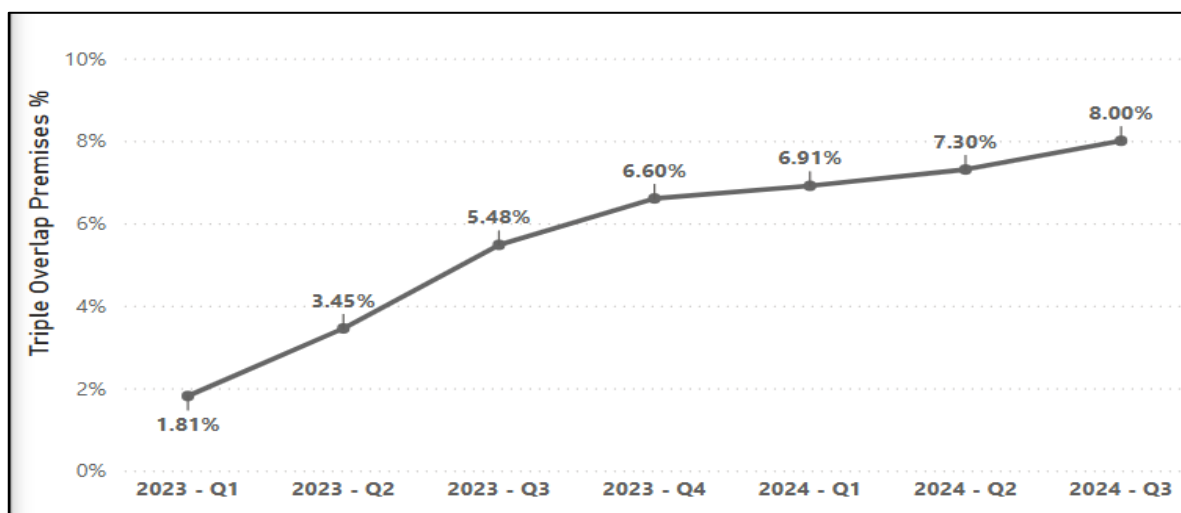
⁴⁹ As mentioned in Paragraph 53 above, NBI also has a small FTTP network presence in the Commercial NG WLA Market. Given it is negligible, it is not considered here.

⁵⁰ See Section 4.2 of the 2024 WLA/WCA Decision for details.

⁵¹ The 'Siro + Virgin Media' figure is not included in the 'Eircom + Siro + Virgin Media' figure.

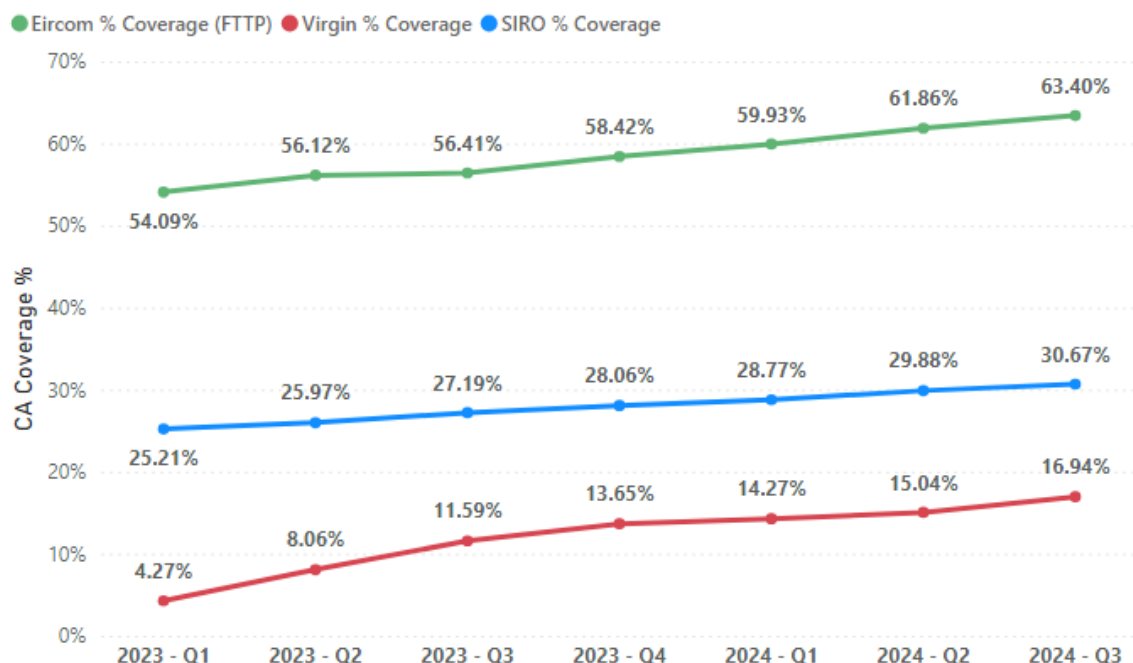
Figure 13: NG WLA Network Overlaps

82. As can be seen, 153,717 premises have NG WLA services from Eircom, SIRO and Virgin Media available, which is 8% of the total premises in the Commercial NG WLA Market. Furthermore, 352,225 have Eircom and SIRO available (18.33%), while SIRO and VMI are available to 16,385 (0.85%) premises in the NG WLA Commercial Market.
83. Figure 14 below sets out the percentage of premises in the Commercial NG WLA Market that are passed by three NG WLA networks, over the period from Q1 2023 to Q3 2024 with this showing that the number of premises now passed by three NG WLA Networks (FTTC included) has risen from 1.8% of premises in Q1 2023 to 8.0% of premises in Q3 2024 (+6.2 p/p).

Figure 14: Share of Premises Passed by 3 networks in the Commercial NG WLA Market

84. Overall, the continued FTTP roll-out and upgrades by NOs has seen a gradual increase in the availability of FTTP in the Commercial NG WLA Market and is broadly in line with that envisaged in the 2024 WLA/WCA Decision.⁵²
85. Looking at the FTTP space alone, i.e., without FTTC, Figure 15 below charts the increase in the FTTP coverage of SIRO and Virgin Media in the Commercial NG WLA Market. This shows that as of Q3 2024 SIRO's coverage stood at 30.67% having risen from 25.21% in Q1 2023 (+5.46 p/p) and, as set out in section 2.4 above has achieved 87% of its revised overall FTTP roll-out target. Similarly, Virgin Media's FTTP coverage stood at 16.94% having risen from 4.27% in Q1 2023 (+12.67 p/p) and, as set out in section 2.4 above has achieved 34% of its overall FTTP roll-out target.

Figure 15: FTTP Only NG WLA Network Coverage in the Commercial Area NG WLA Market

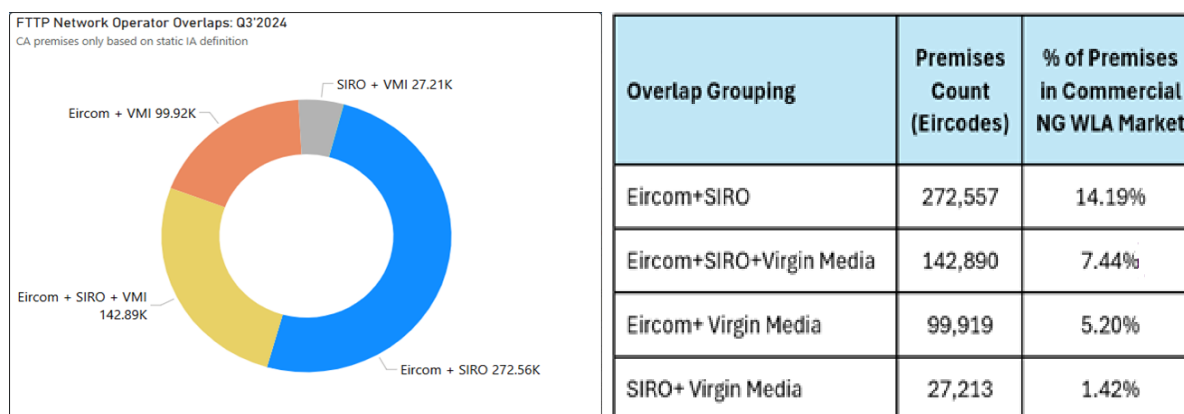


86. The increase in coverage of SIRO's and Virgin Media's FTTP networks is broadly in line with the anticipated trends set out in the 2024 WLA/WCA Decision, although as noted in section 2.4 above SIRO's roll-out target has decreased from 770K premises to 700K premises.⁵³
87. Figure 16 below shows the number of premises in the Commercial NG WLA Market that are passed by more than one FTTP network at Q3 2024.

⁵² See Section 6.5 of the 2024 WLA/WCA Decision for more details.

⁵³ See Section 3.2 of the 2024 WLA/WCA Decision for details.

Figure 16: Number of premises with more than one FTTP Network in the Commercial NG WLA Market



88. As can be seen from Figure 16 above, Eircom, SIRO and Virgin Media overlap at 142,890 premises, which is 7.44% while SIRO and Virgin Media only overlap at 27,213 (1.42%) premises where Eircom FTTP is not available.

4.2.3 Coverage and Market Shares based on the Size of MEAs

89. In this section, ComReg examines coverage, active NG WLA lines and corresponding NO market shares based on the size of the MEAs in the Commercial NG WLA Market as measured by the number of premises within them, as this may provide some indication of any regional variations given that larger MEAs are located in urban areas. In interpreting the data, regard should be had not only to the number of MEAs in each band, but also the number of premises and active lines within these MEAs.
90. Table 4 below groups MEAs in the Commercial NG WLA Market by the number of premises in them. Table 5 sets out changes in this data between Q1 2023 and Q3 2024, looking at this by broadband platform and by NO⁵⁴.
91. In total, as of Q3 2024, there are 1,183 Commercial MEAs, covering 1,921,306 premises. At these premises, as of Q3 2024 there were 1,033,596 active NG WLA services (up from 653,199 in Q1 2023), 354,677 of which were FTTC based services (down from 478,992 in Q1 2023) and 678,919 were FTTP based services (up from 474,207 in Q1 2023).

⁵⁴ In the 2024 WLA/WCA Decision, Q1 2023 was the data point used in examining data geographically.

Table 4: Commercial MEAs by Size: Overview

FTTC & FTTP Overview			Q3 2024			Q1 2023		
Commercial MEA Size Range (Premises)	No. of Commercial Area MEAs Q3 2024	Total Premises In Commercial Area MEAs Q3 2024	Total Active NG WLA Lines in Commercial MEAs Q3 2024	FTTC NG WLA Active Lines in Commercial MEAs Q3 2024	FTTP NG WLA Active Lines in Commercial MEAs Q3 2024	Total Active NG WLA Lines in Commercial MEAs Q1 2023	FTTC NG WLA Active Lines in Commercial MEAs Q1 2023	FTTP NG WLA Active Lines in Commercial MEAs Q1 2023
0 - 1,000	860	312,507	187,640	57,938	129,702	175,631	68,648	106,983
1,001 - 2,500	157	235,757	147,456	47,269	100,187	138,735	69,902	68,833
2,501 - 4,000	43	141,170	89,323	29,182	60,141	83,213	44,433	38,780
4001-5,500	28	130,394	78,677	24,015	54,662	72,339	36,496	35,843
5,501 - 7,000	24	151,207	85,987	28,889	57,098	79,258	39,766	39,492
7,001 - 8,500	12	92,538	56,030	14,603	41,427	51,329	20,979	30,350
8,501 - 10,000	3	28,522	16,309	4,932	11,377	14,990	8,071	6,919
10,001 - 12,500	21	239,360	119,036	44,795	74,241	107,987	56,549	51,438
12,501 - 15,000	15	205,884	108,344	35,953	72,391	101,802	49,757	52,045
15,001 - 17,500	11	177,402	67,980	30,284	37,696	61,474	39,355	22,119
17,501 - 20,000	4	74,303	30,086	13,624	16,462	26,320	17,034	9,286
> 20,001	5	132,262	46,728	23,193	23,535	40,121	28,002	12,119
ALL	1,183	1,921,306	1,033,596	354,677	678,919	953,199	478,992	474,207

92. As can be seen, the majority of MEAs – 860 – have 1,000 premises or less and at the other end of the band, 5 MEAs have more than 20,000 premises.

93. Table 5 shows that in the period Q1 2023 and Q3 2024 Eircom's NG FTTC WLA active lines decreased by 124,315 lines while also adding 142,756 NG FTTP WLA active lines, showing an overall net gain of 18,441 NG WLA lines. SIRO gained 35,826 NG FTTP WLA active lines, Virgin Media gained 25,633 lines, with NBI adding 497 lines.

Table 5: Commercial MEAs by Size: Changes Q1 2023 to Q3 2024 by Platform and NO

FTTC & FTTP Overview			FTTP & FTTC Q3 2024						FTTP & FTTC Changes Q1 2023 to Q3 2024					
Commercial MEA Size Range (Premises)	No. of Commercial Area MEAs Q3 2024	Total Premises In Commercial Area MEAs Q3 2024	Eircom FTTP Q3 2024	Eircom FTTC Q3 2024	Eircom All Q3 2024	SIRO FTTP Q3 2024	VMI FTTP Q3 2024	NBI FTTP Q3 2024	Change in Eircom FTTP Q1 2023 to Q3 2024	Change in Eircom FTTC Q1 2023 to Q3 2024	Change in Eircom ALL Q1 2023 to Q3 2024	Change in SIRO FTTP Q1 2023 to Q3 2024	Change in VMI FTTP Q1 2023 to Q3 2024	Change in NBI FTTP Q1 2023 to Q3 2024
0 - 1,000	860	312,507	123,891	57,938	181,829	4,315	1,218	278	20,943	-10,710	10,233	743	755	278
1,001 - 2,500	157	235,757	88,589	47,269	135,858	10,512	988	98	26,902	-22,633	4,269	4,086	268	98
2,501 - 4,000	43	141,170	38,331	29,182	67,513	19,050	2,732	28	15,054	-15,251	-197	4,721	1,558	28
4001-5,500	28	130,394	31,650	24,015	55,665	19,426	3,575	11	12,983	-12,481	502	3,902	1,923	11
5,501 - 7,000	24	151,207	29,604	28,889	58,493	21,708	5,768	18	10,318	-10,877	-559	4,349	2,921	18
7,001 - 8,500	12	92,538	22,822	14,603	37,425	15,387	3,208	10	6,898	-6,376	522	2,676	1,493	10
8,501 - 10,000	3	28,522	6,121	4,932	11,053	4,668	581	7	3,260	-3,139	121	819	372	7
10,001 - 12,500	21	239,360	32,952	44,795	77,747	33,550	7,721	18	12,747	-11,754	993	5,527	4,511	18
12,501 - 15,000	15	205,884	34,565	35,953	70,518	34,694	3,115	17	14,056	-13,804	252	4,669	1,604	17
15,001 - 17,500	11	177,402	22,186	30,284	52,470	11,219	4,281	10	10,830	-9,071	1,759	2,280	2,457	10
17,501 - 20,000	4	74,303	4,834	13,624	18,458	7,999	3,629	0	2,781	-3,410	-629	1,397	2,998	0
> 20,001	5	132,262	16,077	23,193	39,270	2,405	5,051	2	5,984	-4,809	1,175	657	4,773	2
ALL	1,183	1,921,306	451,622	354,677	806,299	184,933	41,867	497	142,756	-124,315	18,441	35,826	25,633	497

94. Table 6 below looks in more detail at what these numbers mean in terms of market shares across the various MEA size bands for both FTTP and FTTC. It shows that looking at NG WLA overall, in the period Q1 2023 to Q3 2024 Eircom's market share declined by 4.64 p/p to 78.01% (from 82.65%). Over this same time period SIRO's market share grew by 2.25 p/p to 17.89% (from 15.64%), while Virgin Media's market share grew 2.35 p/p to 4.05% (from 1.7%). Across each of the various MEA size bands, Eircom's FTTC and FTTP market shares ranges from 61.35% up to 96.90%.

Table 6: Commercial MEAs by Size: Market Share Changes Q1 2023 to Q3 2024 FTTC & FTTP⁵⁵

	All NG WLA (FTTC & FTTP)										
Comercial MEA Size Range (Premises)	Eircom Market Share Q3 2024 (All)	SIRO Market Share Q3 2024 (All)	VMI Market Share Q3 2024 (All)	NBI Market Share Q3 2024 (All)	Eircom Market Share Q1 2023	SIRO Market Share Q1 2023	VMI Market Share Q1 2023	NBI Market Share Q1 2023	Eircom Market Share Percentage Point Change Q1 2023 to Q3 2024	SIRO Market Share Percentage Point Change Q1 2023 to Q3 2024	Virgin Media Market Share Percentage Point Change Q1 2023 to Q3 2024
0 -1,000	96.90%	2.30%	0.65%	0.15%	97.70%	2.03%	0.26%	0.00%	-0.80%	0.27%	0.39%
1,001 - 2,500	92.13%	7.13%	0.67%	0.07%	94.85%	4.63%	0.52%	0.00%	-2.71%	2.50%	0.15%
2,501 - 4,000	75.58%	21.33%	3.06%	0.03%	81.37%	17.22%	1.41%	0.00%	-5.79%	4.11%	1.65%
4001-5,500	70.73%	24.69%	4.54%	0.01%	76.26%	21.46%	2.28%	0.00%	-5.53%	3.23%	2.26%
5,501 - 7,000	68.03%	25.25%	6.71%	0.02%	74.51%	21.90%	3.59%	0.00%	-6.48%	3.34%	3.12%
7,001 - 8,500	66.79%	27.46%	5.73%	0.02%	71.90%	24.76%	3.34%	0.00%	-5.11%	2.70%	2.38%
8,501 - 10,000	67.77%	28.62%	3.56%	0.04%	72.93%	25.68%	1.39%	0.00%	-5.16%	2.95%	2.17%
10,001 - 12,500	65.31%	28.18%	6.49%	0.02%	71.08%	25.95%	2.97%	0.00%	-5.77%	2.23%	3.51%
12,501 - 15,000	65.03%	32.02%	2.88%	0.02%	69.02%	29.49%	1.48%	0.00%	-3.99%	2.53%	1.39%
15,001 - 17,500	77.27%	16.50%	6.30%	0.01%	82.49%	14.54%	2.97%	0.00%	-5.22%	1.96%	3.33%
17,501 - 20,000	61.35%	26.59%	12.06%	0.00%	72.52%	25.08%	2.40%	0.00%	-11.17%	1.50%	9.66%
> 20,001	84.04%	5.15%	10.81%	0.00%	94.95%	4.36%	0.69%	0.00%	-10.91%	0.79%	10.12%
ALL	78.01%	17.89%	4.05%	0.05%	82.65%	15.64%	1.70%	0.00%	-4.64%	2.25%	2.35%

95. Table 7 below looks in more detail at what these numbers mean in terms of market shares across the various MEA size bands, but for FTTP only. Considering NG FTTP WLA only, Eircom's market share increased by 1.39 p/p to 66.52% (from 65.13%). Over this same time period SIRO's market share fell by 4.2 p/p to 27.24% (from 31.44%), while Virgin Media's market share grew by 2.74 p/p to 6.17% (from 3.42%). Across each of the various MEA size bands, Eircom's FTTP market shares ranges from 29.36% up to 95.52%.

⁵⁵ Given NBI's small numbers, their figures are not shown. Overall, in Q3 2024 it had a 0.05% share of NG WLA active lines.

Table 7: Commercial MEAs by Size: Market Share Changes Q1 2023 to Q3 2024 FTTP Only

Commercial MEA Size Range (Premises)	FTTP NG WLA Only			FTTP NG WLA Only			FTTP NG WLA Only		
	Eircom Market Share FTTP Only Q3 2024	Eircom Market Share FTTP Only Q1 2023	Eircom Market Share FTTP Only Percentage Point Change Q1 2023 to Q3 2024	SIRO Market Share FTTP Only Q3 2024	SIRO Market Share FTTP Only Q1 2023	SIRO Market Share FTTP Only Percentage Point Change Q1 2023 to Q3 2024	Virgin Media Market Share FTTP Only Q3 2024	Virgin Media Market Share FTTP Only Q1 2023	Virgin Media Market Share FTTP Only Percentage Point Change Q1 2023 to Q3 2024
0 -1,000	95.52%	96.23%	-0.71%	3.33%	3.34%	-0.01%	0.94%	0.43%	0.51%
1,001 - 2,500	88.42%	89.62%	-1.19%	10.49%	9.34%	1.16%	0.99%	1.05%	-0.06%
2,501 - 4,000	63.74%	60.02%	3.71%	31.68%	36.95%	-5.27%	4.54%	3.03%	1.52%
4,001 - 5,500	57.90%	52.08%	5.82%	35.54%	43.31%	-7.77%	6.54%	4.61%	1.93%
5,501 - 7,000	51.85%	48.84%	3.01%	38.02%	43.96%	-5.94%	10.10%	7.21%	2.89%
7,001 - 8,500	55.09%	52.47%	2.62%	37.14%	41.88%	-4.74%	7.74%	5.65%	2.09%
8,501 - 10,000	53.80%	41.35%	12.45%	41.03%	55.63%	-14.60%	5.11%	3.02%	2.09%
10,001 - 12,500	44.39%	39.28%	5.10%	45.19%	54.48%	-9.29%	10.40%	6.24%	4.16%
12,501 - 15,000	47.75%	39.41%	8.34%	47.93%	57.69%	-9.76%	4.30%	2.90%	1.40%
15,001 - 17,500	58.86%	51.34%	7.51%	29.76%	40.41%	-10.65%	11.36%	8.25%	3.11%
17,501 - 20,000	29.36%	22.11%	7.26%	48.59%	71.10%	-22.51%	22.04%	6.80%	15.25%
> 20,001	68.31%	83.28%	-14.97%	10.22%	14.42%	-4.20%	21.46%	2.29%	19.17%
ALL	66.52%	65.13%	1.39%	27.24%	31.44%	-4.20%	6.17%	3.42%	2.74%

4.2.4 NG WLA Market - Geographic Assessment Criteria

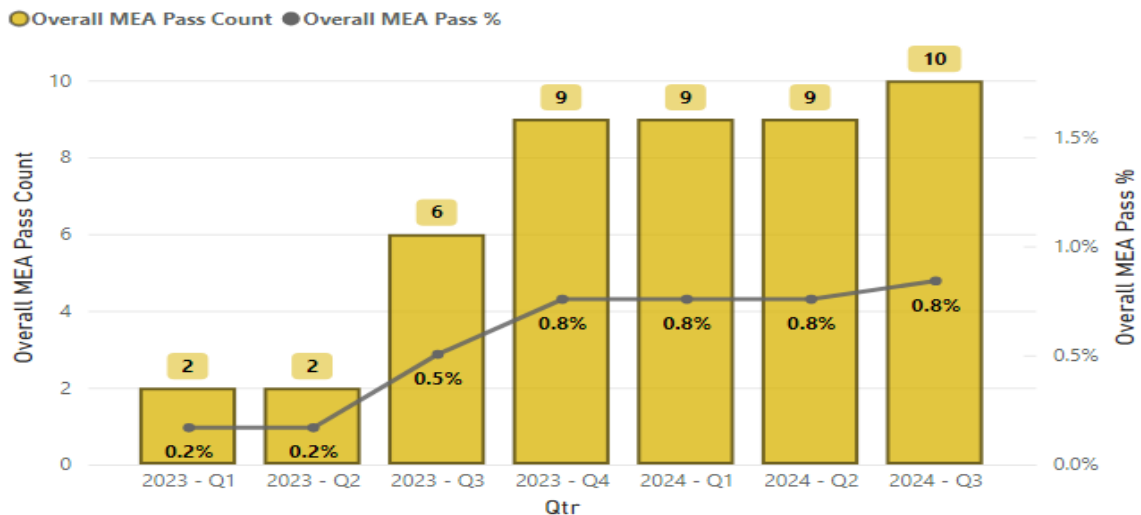
96. In the 2024 WLA/WCA Decision⁵⁶ ComReg set out three cumulative criteria to ascertain the conditions of competition at the MEA level. In summary, the cumulative criteria were as follows⁵⁷:
- (a) **Criterion 1:** At least three NOs in a MEA are capable of delivering VUA (SIRO, Eircom and VMI) must be present, or reasonably forecast to be present at the Modified EA;
 - (b) **Criterion 2:** Individual NO coverage in a MEA must be at least 60%; and
 - (c) **Criterion 3:** At least 50% of premises in a MEA must be passed by at least three NOs.
97. Below ComReg has reapplied these criteria using NOs' coverage data as at Q3 2024. In reapplying the criteria, Figure 17 below shows as at Q3 2024 there has been a small increase in the number of MEAs meeting the criteria cumulatively, with 10 MEAs doing so (representing 0.8% of all MEAs in the Commercial NG WLA Market). No MEAs met the criteria in the 2024 WLA/WCA Decision.
98. However, as noted in paragraph 70 above, Virgin Media did not commence offering NG WLA services at the wholesale level until late Q4 2024 with the introduction of its XGS PON network and that it also had active FTTP retail lines on its historical RFOG network footprint. For the purpose of this monitoring report,

⁵⁶ See Annex 12 of the 2024 WLA/WCA Decision for more details.

⁵⁷ See paragraph 5.383 of the 2024 WLA/WCA Decision.

from Q4 2024, Virgin Media's RFOG FTTP network footprint (and active lines) is treated as being on its XGS PON network and in the figures below, we have retrospectively applied this to periods before Q4 2024 for comparison purposes only. So, while no MEAs met these criteria in the 2024 WLA/WCA Decision, Figure 17 below now includes Virgin Media's RFOG essentially treating it as being XGS PON coverage being in place at that time. This gives rise to 2 MEAs now meeting the geographic assessment criteria.

Figure 17: Cumulative WLA CA Geographic Analysis Criteria

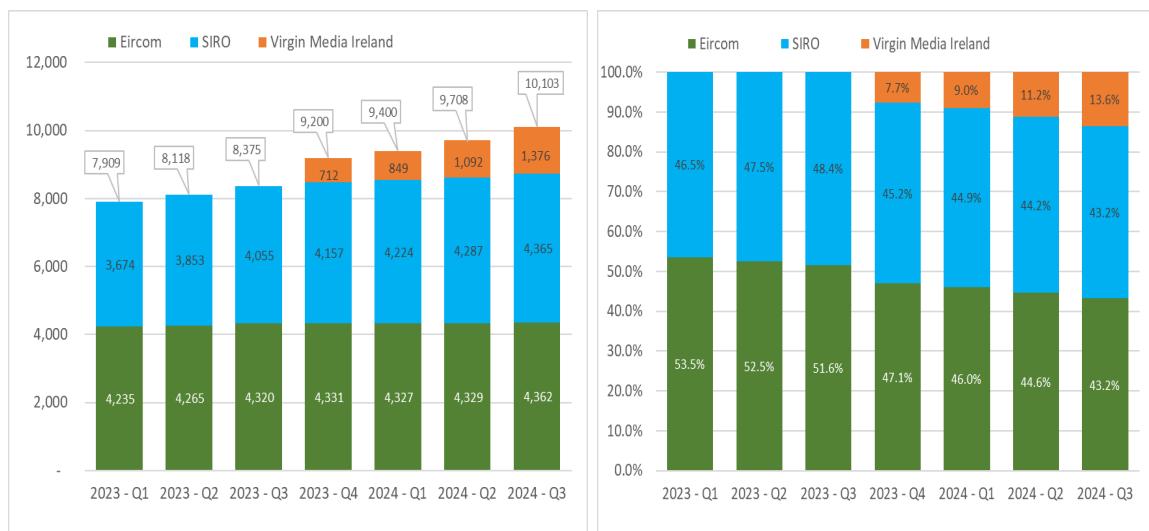


99. Table 8 below sets out the 10 MEAs that meet the cumulative criteria as of Q3 2024. Looking at these 10 MEAs, they are all in the suburbs of towns or cities across the country. These are a mix of small and medium-sized MEAs with the number of premises in each MEA ranging from 284 to 4,450 premises, with there being 15,788 premises overall (equivalent to 0.82% of all premises in the Commercial NG WLA Market)⁵⁸. The total number of active NG WLA lines in these 10 MEAs as at Q3 2024 was 10,103, up from 8,577 lines in Q2 2023 (and is equivalent to 0.98% of all NG WLA active lines in the Commercial NG WLA Market).
100. In terms of coverage, on average, Eircom covers all of the associated premises in these MEAs with NG WLA services, 80% of such coverage being with FTTP. The FTTP networks of Virgin Media and SIRO cover 85% of these premises respectively. Furthermore, 67.4% of the premises in these 10 MEAs have access to three NOs' providing NG WLA services.

⁵⁸ 5 MEAs each have between 284 and 785 premises, 2 MEAs have 1,107 and 1,222 premises, with the remaining 3 MEAs having 2,864, 3,326 and 4,450 premises.

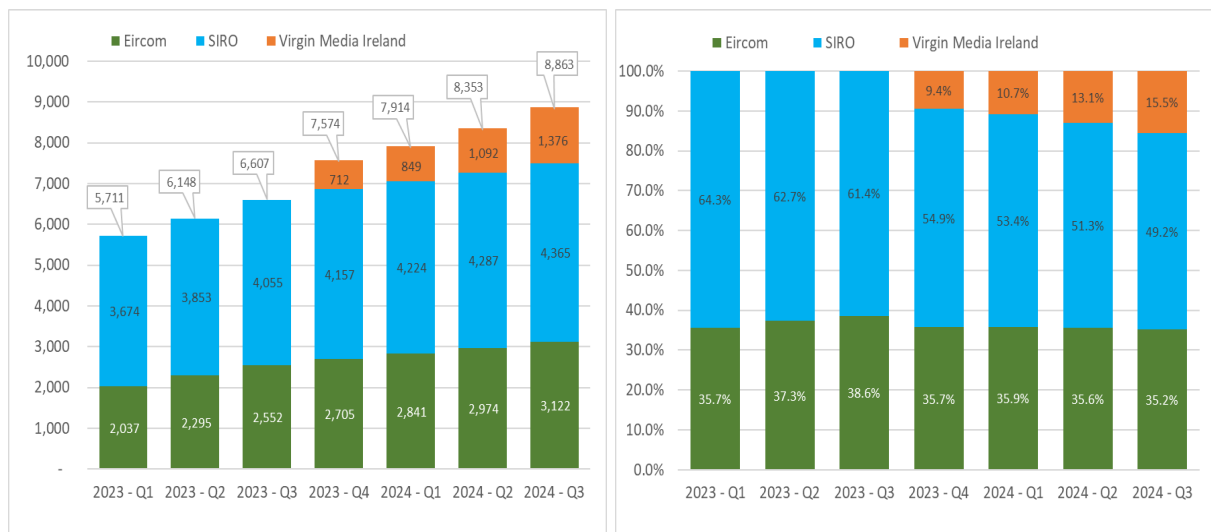
Table 8: MEAs that meet the Cumulative Criteria

EA Code	Name	CA Premises
ARW	Ardrew	1,097
BFF	Balgriffin	3,326
BNN	Ballymoneen	4,450
CSA	Collins Lane	785
GNO	Greenogue	1,222
KIH	Kilcohan	441
MBT	Moneyballytyrril	635
ROM	Roscam	674
TLT	Tyrellstown	2,864
WPK	Whitepark	284
Total CA Premises		15,788

Figure 18: NG WLA Market FTTP/FTTC Active Lines and FTTP/FTTC Market Shares for 10 MEAs Meeting the Geographic Criteria

101. Figure 18 above shows the market shares in the 10 MEAs meeting the geographic assessment criteria above, as at Q3 2024. Looking at FTTC and FTTP NG WLA across these MEAs collectively, it shows that Eircom's market share has declined from 53.5% to 43.2% (down 10.4 p/p) between Q1 2023 and Q3 2024. SIRO has seen a slight decline in its market share from 46.5% to 43.2% (down 3.2 p/p), while Virgin Media's market share has risen to 13.6%.
102. Figure 19 below shows that the total number of active NG FTTP WLA lines in these 10 MEAs as at Q3 2024 was 8,863 lines, up from 5,711 FTTP lines in Q1 2023 (equivalent to 1.3% of all active FTTP lines in the Commercial NG WLA Market, in Q3 2024). It shows that Eircom's FTTP market share has declined marginally from 35.7% to 35.2% (down 0.5 p/p). Over the same period SIRO has seen a decline in its market share from 64.3% to 49.2% (down 15.1 p/p), with Virgin Media's market share having risen to 15.5%.

Figure 19: NG WLA Market FTTP Active Lines and FTTP Market Shares for the 10 MEAs Meeting the Geographic Criteria.⁵⁹



4.2.5 Overall Conclusions on NG WLA Market - Geographic Assessment Criteria

103. Having regard to the above, the 10 MEAs now meeting the cumulative criteria for the geographic assessment the associated premises (15,788) represent 0.82% of all premises in the Commercial NG WLA Market as of Q3 2024. This confirms that the conclusions of the 2024 WLA Decision remain valid.

4.3 IA NG WLA Market

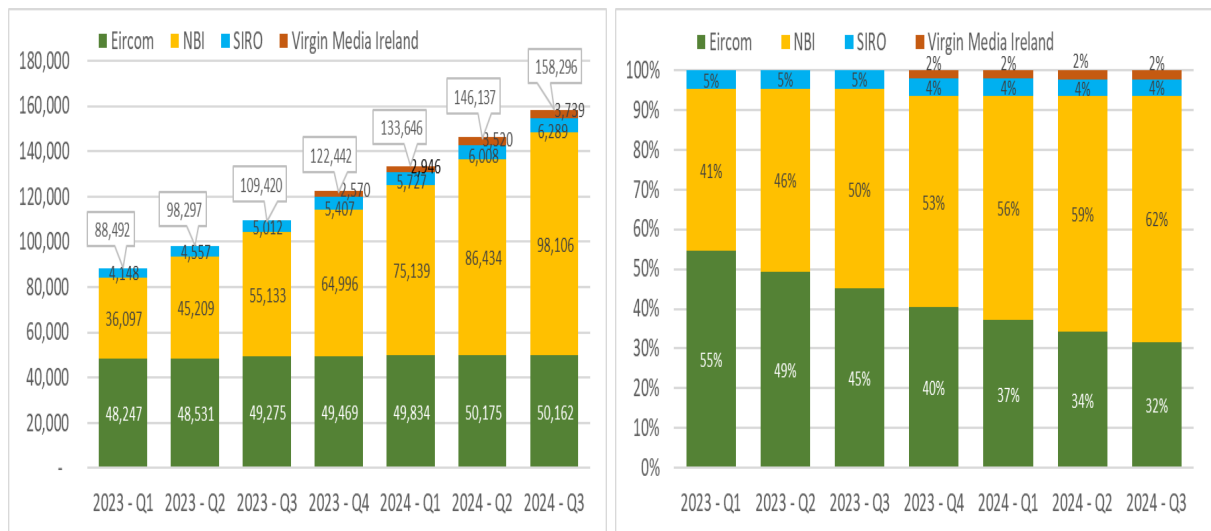
104. As set out in section 2.2 above, the NG WLA IA market was effectively defined as encompassing all premises in a MEA falling within the NBP IA as delimited in the 2024 WLA/WCA Decision. The IA NG WLA Market is therefore comprised of 486,720 premises in 1,155 MEAs and, for the purpose of the 2024 WLA/WCA Decision, is static.

105. As set out in Table 1 above NBI have, as of Q3 2024, passed 380,180 premises, reaching approximately 53% of their roll-out target which is scheduled for completion in 2027.

106. Figure 20 below shows the trends in the take-up of NG WLA services in the IA. As to be expected, the number of premises availing of NG WLA based services from NBI has steadily increased with the roll-out of the NBP by NBI.⁶⁰

⁵⁹ Note NBI data not shown as it has a small FTTP network presence and number of active FTTP lines in the Commercial NG WLA Market.

⁶⁰ As set out in paragraph 55 above, the IA NG WLA Market is defined with reference to the 486,720 premises that were identified as falling within the NBP IA in Q1 2024.

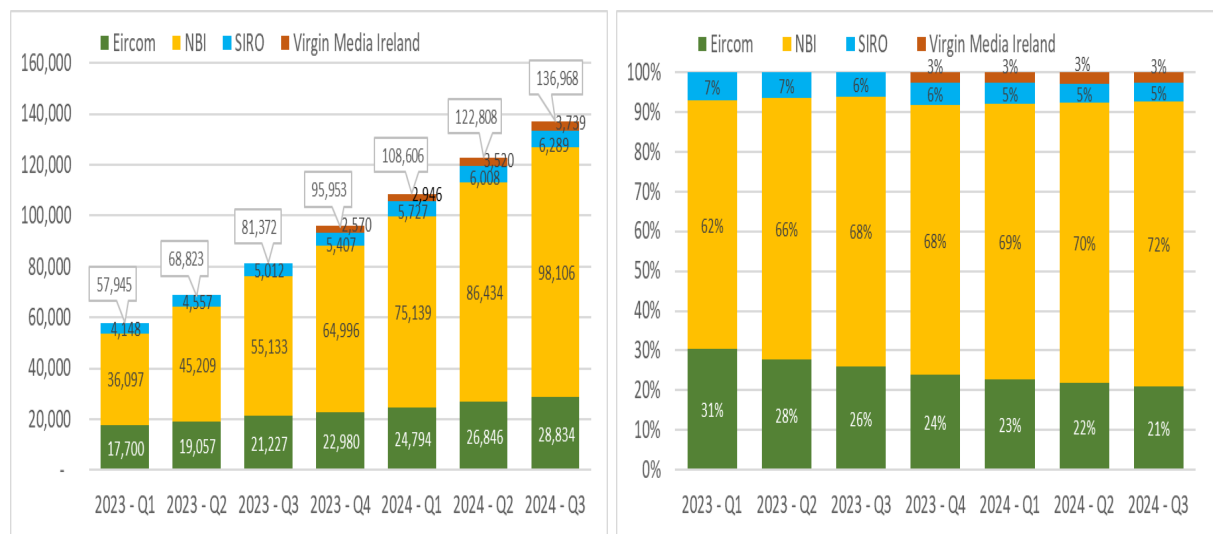
Figure 20: NG WLA Market Shares in the IA NG WLA Market

107. Of the 158,296 active NG FTTC and FTTP lines in the IA, as of Q3 2024 98,106 of them were provided on NBI's network, giving it a 62% market share (+19.9 p/p since Q1 2023) in the IA NG WLA Market. Having regard to this trend and as NBI's FTTP roll-out continues, NBI's market share growth is expected to continue further, with corresponding declines in other NOs' market shares.
108. It is worth noting that other NOs have some presence in the IA NG WLA Market. One reason for this is associated with the actual changes in the premises falling within the NBP IA (as opposed to the IA NG WLA Market which is fixed) where, as noted earlier, premises can be both added and removed. For example, some of the 486,720 premises in the IA NG WLA Market have subsequently been removed from (or other premises added to) the NBP IA and, where these have been removed, it is presumably because they are being served commercially by other NOs (with such NOs also now having active NG WLA lines at such premises).
109. Furthermore, Eircom would have provided or continues to provide active NG WLA FTTC (and indeed CG WLA) services to some of the premises in the IA NG WLA Market and such premises would nonetheless have been included in the NBP IA on the basis that they were not of an adequate quality (say in terms of download speeds or other parameters). It would be expected that the number of FTTC active lines in the IA NG WLA Market provided on Eircom's network would decline as NBI's FTTP network roll-out moves to completion⁶¹.

⁶¹ Eircom would also have had active CG (copper based) WLA lines in the NBP IA and the growth in NBI's NG WLA lines can also be attributed to customers switching from these services.

110. As of Q3 2024 Eircom had 50,162 active NG WLA lines in the IA NG WLA Market, up from 48,247 in Q1 2023, an increase of 1,915. SIRO have 6,289 active NG WLA lines, an increase of 2,141 since Q1 2023, with Virgin Media having 3,739 active NG WLA lines, up from 2,570 in Q4 2023, when they commenced selling active lines to other operators.
111. Looking at FTTP NG WLA in particular, Figure 21 below shows the number of active FTTP NG WLA lines over time and corresponding market shares. Overall, the number of active FTTP lines in the IA NG WLA Market has grown from 59,418 to 136,968 from Q1 2023 to Q3 2023, an increase of 77,550.

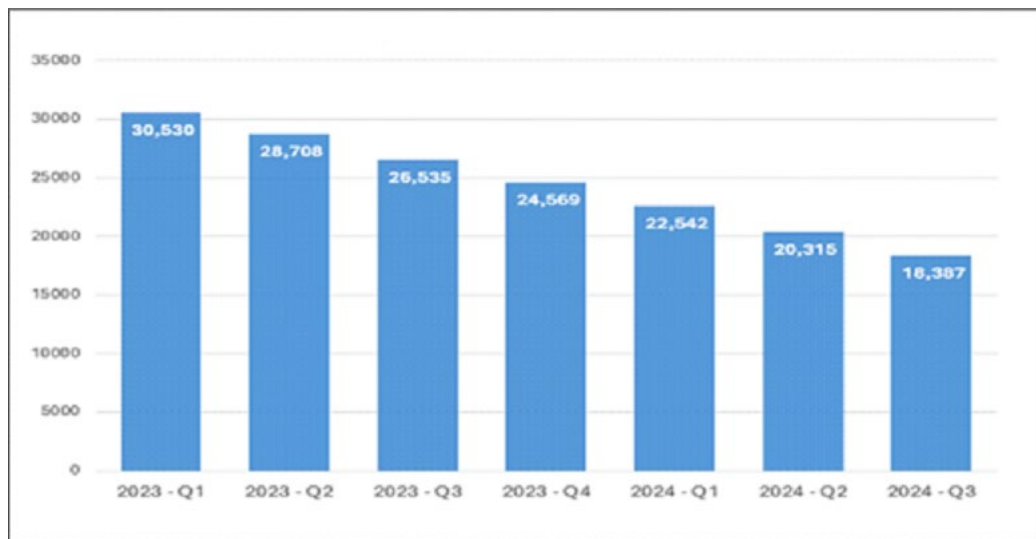
Figure 21: FTTP Market Shares in the IA NG WLA Market



112. Looking at individual NOs, NBI's active NG WLA FTTP lines has grown from 36,097 in Q1 2023 to 98,106 in Q3 2024, an increase of 62,009, with its share of FTTP services growing from 60.8% to 71.6% over this period.
113. Over this same period, the number of Eircom active NG WLA FTTP lines has grown from 17,700 to 28,834, an increase of 11,234 with its corresponding market share decreasing from 29.8% to 21.1%. SIRO's active NG WLA FTTP lines increased from 4,148 to 6,289, an increase of 2,141, with its market share falling from 7.0% to 4.6%. Finally, Virgin Media's active NG WLA FTTP lines increased from 2,570 to 3,739, an increase of 1,169, which has kept its corresponding market share constant at 2.7%.
114. As such, the majority of the increase in FTTP in the NG WLA IA Market is driven by NBI and is likely attributable to its corresponding increase in FTTP coverage. In this respect, it is informative to consider changes in the volumes of CG WLA lines in the footprint of the IA NG WLA Market, given the likelihood that declines in such services are associated with the corresponding growth in FTTP based NG WLA.

115. Figure 22 below shows the change in the number of active CG lines in the footprint of the IA NG WLA Market since Q1 2023.⁶² In order to identify whether or not an active CG WLA line is in the footprint of the IA NG WLA Market, ComReg identifies active CG WLA lines for which Eircode information has been provided. Based on data as at Q3 2024, approximately 70.50% of all active CG WLA lines have an Eircode and it is only these lines that can be checked in order to identify whether or not they fall into the footprint of the IA NG WLA Market (i.e. 29.5% of CG lines cannot be checked). As such, the data in Figure 22 below likely underrepresents the position.

Figure 22: CG Active Lines in the footprint of the IA NG WLA Market



116. As can be seen from Figure 22, the number of active CG lines in the footprint of the IA NG WLA Market has declined from 30,530 in Q1 2023 to 18,387 in Q3 2024, a drop of 39.8%, with this decline likely to be somewhat attributable to the growth in active FTTP NG WLA lines (with consumers switching to these services once they become available at their premises).
117. Figure 23 below sets out changes in FTTP coverage in the IA NG WLA Market in the period Q1 2023 to Q3 2024. As noted in paragraph 66, the boundaries of the IA NG WLA Market were fixed at the time of the 2024 NG WLA Decision, but premises can nonetheless be both added and removed from the NBP IA. This should be borne in mind when considering commercial NOs' FTTP coverage in the IA NG WLA Market.

⁶² See Section 5 below for more details on the CG WLA Market.

Figure 23: FTTP Coverage in the IA NG WLA Market

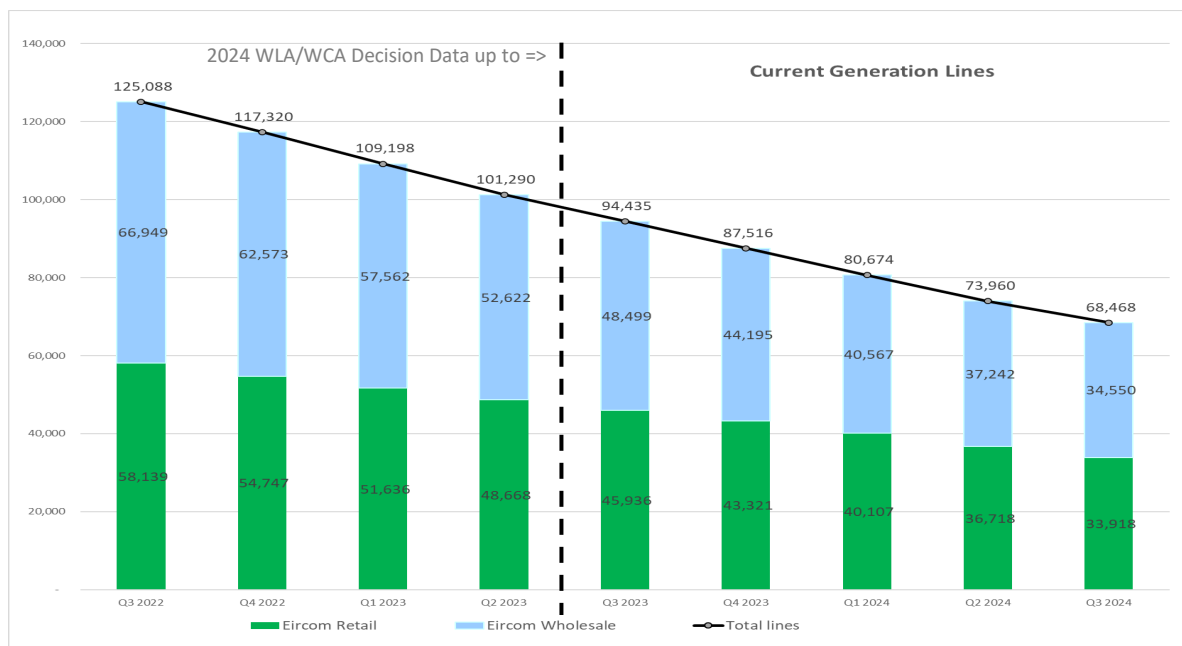
	Q1 2023	Q2 2023	Q3 2023	Q4 2023	Q1 2024	Q2 2024	Q3 2024	P/P Change Q1 2023 to Q3 2024
NBI	23.30%	27.46%	32.45%	36.46%	41.05%	47.01%	52.82%	29.52%
Eircom	9.42%	10.22%	11.54%	12.53%	13.74%	15.19%	16.36%	6.94%
SIRO	2.35%	2.67%	2.99%	3.22%	3.47%	3.67%	4.06%	1.71%
Virgin Media	0.70%	2.67%	2.99%	3.22%	3.47%	3.67%	2.07%	1.37%

118. In the period Q1 2023 to Q3 2024 NBI's FTTP coverage increased to 52.82% (up 29.5 p/p), Eircom's FTTP coverage increased to 16.36% (up 6.9 p/p), SIRO's FTTP coverage increased to 4.06% (up 1.7 p/p), while Virgin Media's FTTP coverage increased to 2.07% (up 1.37 p/p).
119. Having regard to the above, the trends and developments in the IA NG WLA Market are broadly in line with that which was expected at the time of the 2024 WLA/WCA Decision, although ComReg notes that commercial NOs have increased their FTTP coverage in this market with this expectation signalled in the 2024 WLA/WCA Decision.

5 CG WLA Trends

120. As noted in section 2.2, ComReg withdrew SMP based regulation from the national CG WLA Market with it being noted at the time that this was in persistent decline, and it was expected that the number of active CG WLA lines were likely to continue to decline in the future⁶³.
121. Additionally, where Eircom continues to offer CG WLA, ComReg noted that this is likely to be concentrated in the footprint of the IA where, on a forward-looking basis, NBI FTTP is capable of delivering NG WLA. As set out in Figure 22 above, the number of active CG WLA lines in the footprint of the IA NG WLA Market has declined from 30,530 in Q1 2023 to 18,387 in Q3 2024 a drop of 39.8%.
122. As shown in Figure 24 below, the number of active CG WLA lines on the Eircom network overall has continued to decline.

Figure 24: Active CG WLA Lines



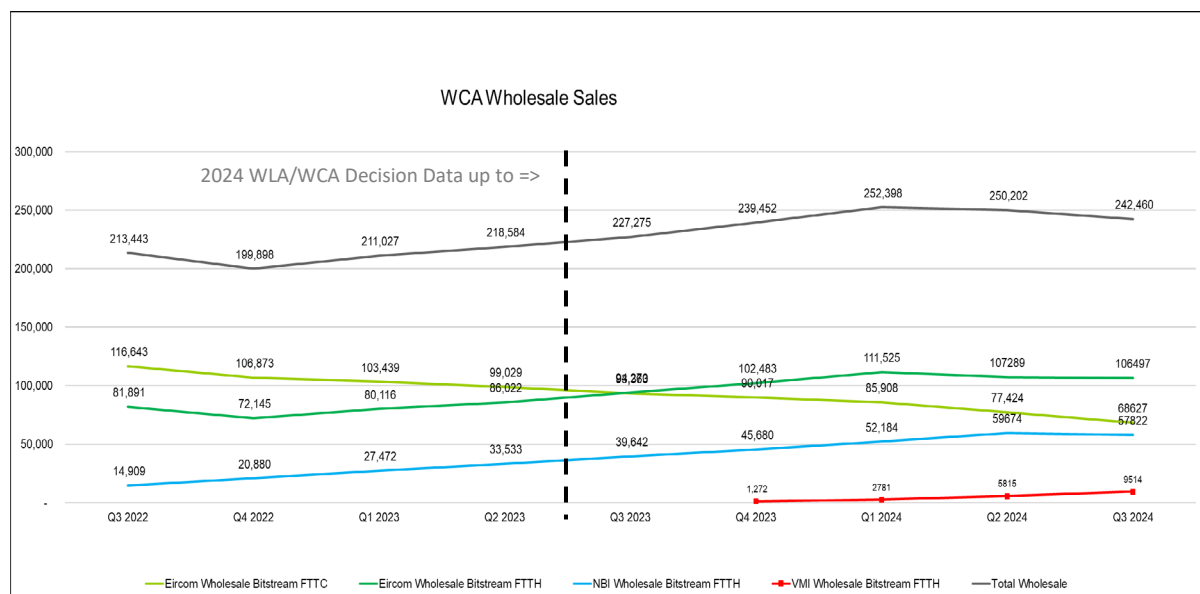
123. In this respect, in Q2 2023, there were 101,290 CG WLA lines active on Eircom's network, 51.95% of which were sold at the wholesale level to other SPs and 48.05% used by Eircom for its own retail arm. By Q3 2024, the total CG WLA lines sold had reduced to 68,468 (a decline of 32.4%) with a roughly 50/50 split between wholesale and retail being maintained (50.46% wholesale and 49.54% retail).
124. Having regard to the above, the trends and developments in the CG WLA Market are broadly in line with that which was expected at the time of the 2024 WLA/WCA Decision.

⁶³ See section 6.7.3 of the 2024 WLA/WCA Decision.

6 WCA Trends

125. As noted in section 2.2, in the 2024 WLA/WCA Decision ComReg decided that continued *ex ante* regulation of the WCA market was no longer warranted, in effect, finding that the retail broadband market would likely be effectively competitive in the absence of WCA regulation (but in the presence of WLA regulation⁶⁴).
126. Figure 25 below looks in more detail at the NOs selling WCA services to retail SPs i.e. wholesale sales only (not accounting for sales by a NO to its own retail arm, where relevant). Most wholesale sales are from Eircom, although NBI also provide WCA in the NBP IA. Furthermore, Virgin Media only began selling WCA services on their FTTP network in Q4 2023.

Figure 25: WCA Merchant Market Sales



127. Over the period Q2 2023 to Q3 2024, at a national level, Eircom's merchant market sales of WCA over FTTC have fallen from 99,029 lines to 68,627 lines, while its FTTP WCA sales to other SPs has grown from 86,022 lines to 106,497 lines over the same period. This gives rise to a total net reduction of 9,927 WCA lines (185,057 to 175,124), a decline of 5.4%.
128. Over the same period, NBI has increased its WCA merchant market sales from 27,472 lines to 57,822 lines, an increase of 30,350 lines. Finally, VMI started selling merchant market WCA on its FTTP network in Q4 2023 where it sold 1,214 lines, with this having increased to 9,514 lines in Q3 2024.

⁶⁴ See Section 7.5 and 7.6. of the 2024 WLA/WCA Decision for more details.

129. Considering overall WCA merchant market sales across all NOs, this showed an increase from 218,584 active lines in Q2 2023 to 242,460 lines in Q3 2024, an increase of 23,876 lines. Having regard to the above, a large component of this growth is accounted for by increases in NBI's WCA active lines over the period, with Virgin Media also accounting for a proportion.
130. Having regard to the above, the trends and developments in the WCA market are broadly in line with that which was expected at the time of the 2024 WLA/WCA Decision.

7 PIA Market Trends

131. As set out in Section 2.3 above, the 2024 PIA Decision defined a national market consisting of telecoms-specific PI⁶⁵ – namely the ducts, poles and associated facilities such as chambers – that are capable of housing wired ECNs. Such PI is used to support the provision of both wholesale and retail services to residential and business users.
132. Eircom and Virgin Media mainly use their own PI to deploy their telecoms networks, while NBI mainly uses Eircom's PI. SIRO mainly uses the ESB's non-telecoms specific PI⁶⁶.
133. ComReg currently collects structured data annually from SPs in relation to PI use, with the most recent data available for the year ending 2023.⁶⁷ Consequently, this section of the monitoring report is largely based on 2023 data. ComReg also collects bespoke data from Eircom covering periods in 2024⁶⁸ in relation to its SMP regulated provision of wholesale PIA, and this data is also utilised.
134. Figure 26 below shows the revenue from the rental of ducts and pole access by the three largest providers of PIA between 2020 and 2023. It shows that Eircom has been the largest provider of duct access and the sole provider of pole access over each of these 4 years and has continued to grow its revenues in each of these years. Eircom's revenue share of duct access rentals has grown from [X ██████████ X].

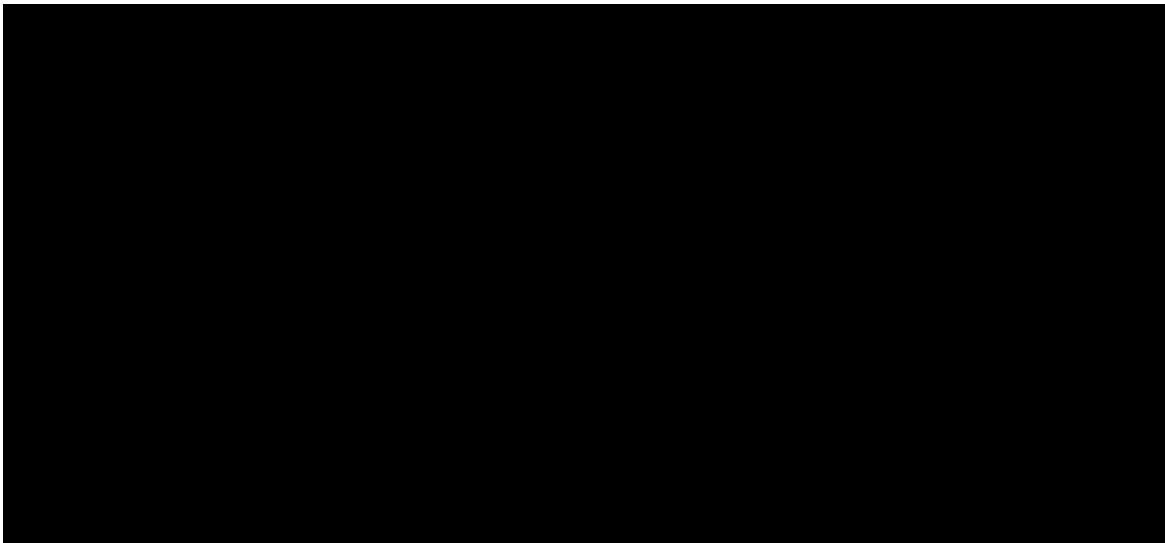
⁶⁵ The 2024 PIA Decision excluded from the market non-telecoms specific PI - such as the ESB's PI which supports the electricity network, and which is used by SIRO.

⁶⁶ For more details, see Section 3.3 of the 2024 PIA Decision.

⁶⁷ ComReg received the PIA data for 2023 from SPs in September 2024 (this data is still subject to ongoing checks and may be amended in light of this). ComReg is also intends gathering PIA data for 2024 during the year.

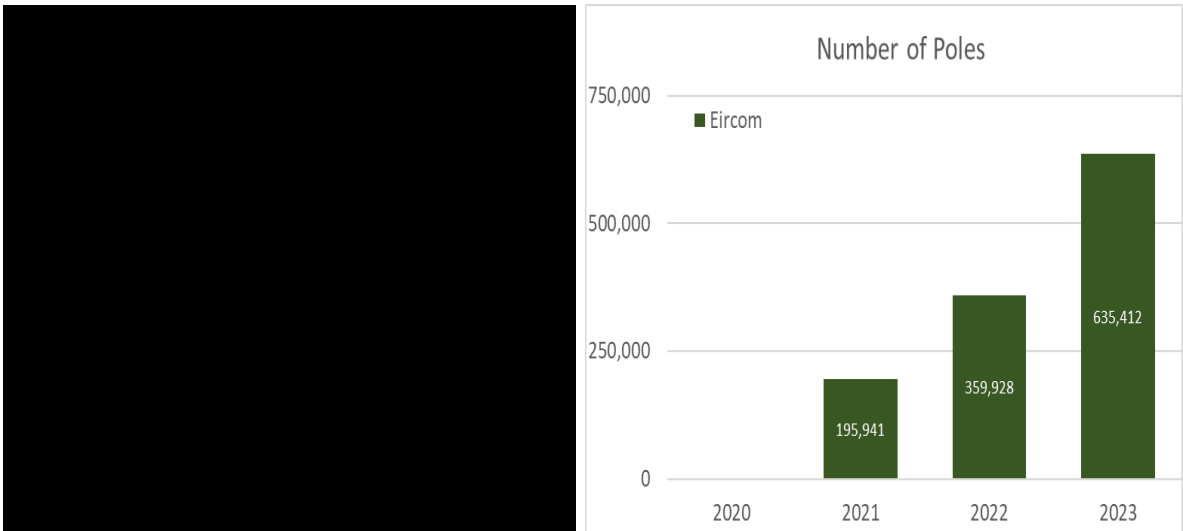
⁶⁸ ComReg has received some provisional information on the number of Eircom provisioned orders of ducts to other SPs for the period May to December 2024.

Figure 26: SP Wholesale PIA Revenue by Ducts & Poles 2020-2023 (€ and %)
[REDACTED]



135. Figure 27 below shows the quantity of ducts (kms) and poles (units) provided at a wholesale level by SPs in each of the years 2020 to 2023. In 2023 Eircom accounted for over 90% ([REDACTED]) of the total length of telecom duct access sold, up from [REDACTED] in 2022. eNet accounted for [REDACTED] in 2023, down from [REDACTED] in 2022, while the other telecoms operators accounted for the remaining [REDACTED] in 2023. Eircom is the sole provider of pole access, with its volumes increasing to just over 635K poles in 2023, an increase of 77% on the 2022 figure.

Figure 27: Volumes of Pole and Duct Access Sales 2020-2023 [PARTIALLY REDACTED]



136. Table 9 below shows the main purchasers of Eircom duct PIA in 2022 and 2023.

Table 9: Eircom Duct Access provision to other SPs - 2022 to 2023

Purchaser	2022		2023		Change
	km	%	km	%	km
NBI	4,821	98.2%	8,470	98.1%	3,649
eNet	33	0.7%	63	0.7%	30
Virgin Media	18	0.4%	52	0.6%	35
SIRO	17	0.3%	26	0.3%	9
Magnet	18	0.4%	18	0.2%	0
BT Ireland	5	0.1%	3	0.0%	-2
Total	4,912	100.0%	8,632	100.0%	3,721

137. Table 9 above shows that the length of duct access provided by Eircom in 2023 stood at 8,671km, an increase from 4,912 km in 2023 with almost all of this (over 98%) being provided to NBI either in the IA or for the purposes of accessing the IA in the context of the NBP. In terms of other SPs there have some increases in their use of Eircom duct access, although relatively small in an overall context.
138. In relation to pole access, NBI was the sole purchaser of pole access with 635,412 poles accessed in 2023, again for the purposes of the NBP.
139. Furthermore, as noted in paragraph 133 above, ComReg collects bespoke information from Eircom regarding its SMP regulated provision of duct and pole access, with this covering the period between 20 May and 31 of December 2024. In that period, there were 614 orders for Eircom's ducts access products.⁶⁹ These orders were from NBI, Virgin Media, E-net, Siro and BT Ireland. However, ComReg cannot identify the length of these duct orders at either an individual order level or an aggregate level at this time as the data does not enable this.
140. Overall, the data shows that wholesale use of duct and pole access products continues to increase, with NBI continuing to be the predominant user of these Eircom products, with much smaller scale use (but increasing in some cases) by other SPs. However, based on this data, there has been immaterial use of either duct or pole access to support the provision of wholesale broadband services outside the IA.

⁶⁹ The detail of these orders will be captured in 2024 PIA data which is to be collected during 2025.