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1 Executive Summary

1. In March 2025, ComReg published the [Wholesale Monitoring Report – Issue 1](#).¹ That report provided insights into developments concerning retail and wholesale fixed broadband and related markets since they were last reviewed in ComReg Decision D05/2024² (**'2024 WLA/WCA Decision'**) and in the related ComReg Decision D04/2024³ (**'2024 PIA Decision'**) up until Q3 2024. This second report provides a further update on the insights and developments up to the end of Q3 2025.
2. 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.”*⁴
3. 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, 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 2025. Eircom remains the largest FTTP network, passing 1.447m premises, followed by SIRO (680K premises) NBI (420K premises) and Virgin Media (492K). FTTP take-up rates differ across these NO’s FTTP networks, and as of Q3 2025, Eircom had the highest take-up rate at 38.6%, followed by NBI (35.2%), SIRO (31.2%) and Virgin Media (17.6%).
4. 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.

¹ Wholesale Market Monitoring Report – Issue 1, Wholesale Broadband and Physical Infrastructure Access Markets, [ComReg Document 25/15](#) (**'Wholesale Monitoring Report – Issue 1'**).

² 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'**).

³ Market Review: Physical Infrastructure Access (**PIA**) Market Review, ComReg 24/05, D03/24, 18th January 2024 (**'2024 PIA Decision'**).

⁴ See paragraph 1.21 in the 2024 WLA/WCA Decision. Also of relevance is paragraph 1.39.

5. In the Commercial Next Generation ('**NG**') WLA Market (encompassing FTTC and FTTP), as at Q3 2025, Eircom's market share⁵, at 73.6% 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 18.8% (+2.9 percentage points ('**p/p**')) and 7.5% respectively. Furthermore, the total size of the market has increased from 936,965 to 1,092,172 lines over this period.
6. However, when measured in FTTP terms only (i.e. excluding FTTC) in the Commercial NG WLA Market, Eircom's share has declined slightly over the period since Q1 2023 standing at 64.4% (-3.0 p/p) as at Q3 2025, with SIRO's FTTP share declining to 25.2% (-7.4 p/p) and Virgin Media's reaching 10.1%. A range of other metrics have been examined, including the number of premises in the Commercial NG WLA Market that are passed by three NG WLA networks. Over the period from Q1 2023 to Q3 2025 this shows that the number of premises in the Commercial NG WLA Market now passed by three NG WLA networks (FTTP and FTTC) has risen from 1.8% of premises in Q1 2023 (34K premises) to 10.2% of premises in Q3 2025 (200K premises).
7. Applying the cumulative geographic assessment criteria established in the 2024 WLA/WCA Decision⁶ to identify any material changes in the geographic component of the NG WLA Markets, data as of Q3 2025 shows that 11 out of 1,183 Modified Exchange Areas ('**MEAs**')⁷, containing 35,355 premises, pass the cumulative geographic criteria in the Commercial NG WLA Market (it was zero MEAs in the 2024 WLA/WCA Decision).
8. Accordingly, trends and developments in the Commercial NG WLA Market are progressing broadly in line with those envisaged under the 2024 WLA/WCA Decision.
9. As regards the wholesale Current Generation ('**CG**') WLA Market, which concerns copper only wholesale broadband, the number of active CG lines continues to decline.
10. With respect to the WCA merchant market, overall, the number of active WCA lines between Q2 2023 and Q3 2025 has increased by 59% from 218,584 to 347,107. A component of this growth is accounted for by Sky switching its WCA provider from BT to Eircom in Q4 2024 and also the increase in NBI's active WCA lines over the period.⁸

⁵ Note market shares include self-supply to an SP's own retail arm (where relevant and wholesale supply to other SPs).

⁶ See section 4.2.4 below.

⁷ See Figure 21 below.

⁸ It should be noted that there was a broadly commensurate fall in Eircom's WLA sales to BT.

11. Annex 1 of this report updates the assessment carried out in the 2024 WLA/WCA Decision which considered the hypothetical impact of the upgrade of Virgin Media's cable broadband to an FTTP network; i.e. the likely impact of the completed upgrade of its cable network to FTTP.⁹ This also shows that developments are progressing broadly in line with those envisaged under the 2024 WLA/WCA Decision.
12. Finally, as of the time of publication, updated Physical Infrastructure Access ('PIA') data was not available due to difficulties experienced with some SPs in providing reliable information in a timely manner for H2 2024 and H1 2025. ComReg is continuing to engage with such SPs.
13. In order to provide further transparency ComReg is examining the possibility of publishing on its website¹⁰ on a more regular basis a cohort of the data set out in its monitoring reports - whether on a quarterly or other basis. PIA information will be considered for publication in this context.

⁹ See Annex 12 of the [2024 WLA/WCA Decision](#).

¹⁰ For example, at <https://www.comreg.ie/industry/electronic-communications/data-portal/downloads/>.

2 Overview

14. This second 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 2025.¹³

2.1 Background to the 2024 WLA/WCA Decision

15. Before describing the market trends and developments in detail, it is useful to briefly describe the relationship between NOs and wholesale and retail broadband SPs.
16. 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.
17. 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').

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 and the publication of the Market Monitoring Report - Issue 1, 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 12,179 lines as of Q3 2025.

¹⁵ www.eircom.ie.

¹⁶ www.nbi.ie.

¹⁷ www.siro.ie.

¹⁸ www.virginmedia.ie.

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

18. 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.
19. 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.
20. 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'**).
21. 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.
22. No SP was found to have SMP in either the CG WLA Market or the IA NG WLA Market.

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 565,000 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 4.3 below for further details.

23. 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).

2.2 Background to the 2024 PIA Decision

24. 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.
25. 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.
26. 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.

2.3 Broadband Network Operators

27. The broadband platforms of each of the main NOs identified in paragraph 16 above have been deployed across a range of different geographic areas. All four NOs are rolling out and/or upgrading their networks to FTTP.
28. 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

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

29. Virgin Media's CATV and FTTP broadband networks covers approximately 984K 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 FTTP²⁶.
30. SIRO's deployment of FTTP is occurring in various large and medium sized towns and cities, mainly in the Commercial NG WLA Market and it is aiming to pass 700K premises²⁷ 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).²⁸ Furthermore, NBI is rolling out FTTP in the IA NG WLA Market²⁹.
31. Figure 1 below shows the roll-out trends from Q1 2020 up to Q3 2025 of all 4 NOs and as well as the roll-out targets, 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 1 below presents the annual incremental roll-out of FTTP by each NO between 2020 and Q3 2025, with Table 2 setting out NOs' roll-out expressed as a percentage of their announced overall planned roll-out targets.

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

²⁶ See [Virgin Media reaches 550,000 fibre milestone and launches Ireland's first 5 gigabit broadband service.](#)

²⁷ See <https://siro.ie/news-and-insights/siro-expands-full-fibre-broadband-to-cobh/>.

²⁸ See <https://siro.ie/roll-out/>.

²⁹ [Over 150,000 homes, farms, and businesses now connected to high-speed broadband under National Broadband Plan - NBI.](#)

Figure 1: Network Operators FTTP Targets & Rollout Q1 2020 to Q3 2025

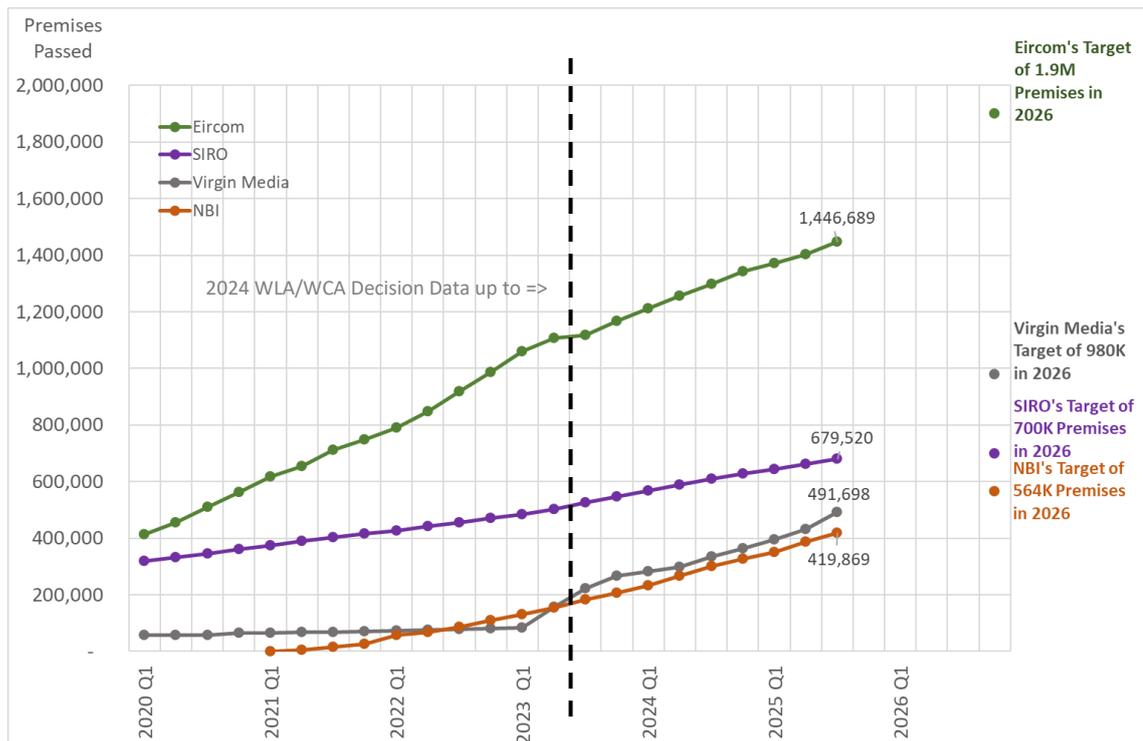


Table 1: Incremental FTTP Rollout by Period

Year / Network Operator	2020	2021	2022	2023	2024	Q1- Q3 2025
Eircom	150,309	129,915	196,439	106,759	131,657	102,784
NBI	0	26,233	52,955	74,638	93,808	93,502
SIRO	39,890	42,996	46,362	62,770	61,254	51,298
Virgin Media	6,670	4,821	9,019	182,368	83,433	126,963

Table 2: Percentage Roll-Out Target Achieved

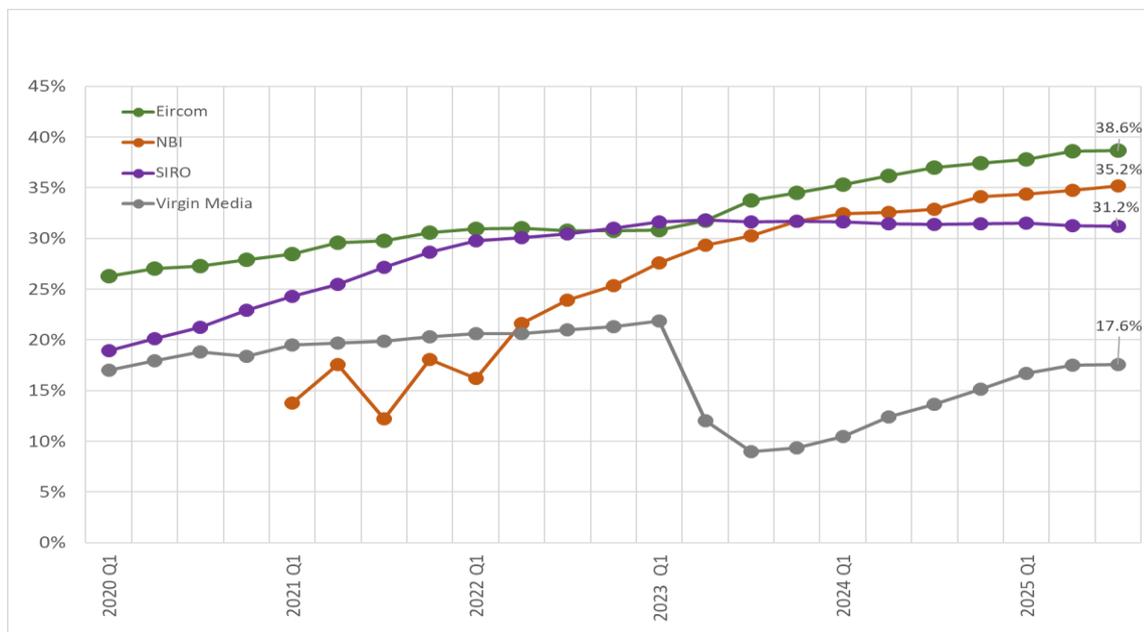
Network Operator	Announced FTTP Rollout Premises Target	FTTP Rollout Target % Achieved Q3 2025	Announced Completion Date
Eircom	1.9m	76%	2026
NBI	564k	74%	2026
SIRO	700k ³⁰	97%	2026
Virgin Media	980k	50%	2026 ³¹

³⁰ In public statements, SIRO's FTTP coverage target has reduced from 770K premises to 700K premises.

³¹ In 2021, when Virgin Media announced its FTTP network upgrade plans it signalled that it expected this to take 3 years. As set out in the 2024 WLA/WCA Decision, ComReg noted that it was likely to be a number of years before Virgin Media's upgrade was complete – potentially by the end of the five-year market review period. In its most recent [public statement](#) it expects to complete its roll-out in 2026.

32. Noting the above, it would appear that both NBI and SIRO appear to be well on track to achieve their publicly stated roll-out targets within the next year. Eircom still has to pass some 453K premises to achieve its roll-out target of 1.9m by 2026 and while we understand that its pace of roll-out would have been impacted by the need to divert resources to repair network damaged by significant storms³², this target appears challenging in that timeframe. Virgin Media has achieved just over 50% of its roll-out target and as set out in the 2024 WLA/WCA Decision³³ VMI FTTP rollout figures may be characterised by unevenness and irregularity, such that reporting in one period may not give reliable indicators of activity in subsequent periods. Its target of completing its roll-out by the end of 2026 appears challenging.

Figure 2: FTTP Take-up Per Network Operator



³² For example, Storm Éowyn which occurred in January 2025.

³³ See Footnote 103.

33. Noting the above, it would appear that both NBI and SIRO appear to be well on track to achieve their publicly stated roll-out targets within the next year. Eircom still has to pass some 453K premises to achieve its roll-out target of 1.9m by 2026 and while we understand that its pace of roll-out would have been impacted by the need to divert resources to repair network damaged by significant storms, this target appears challenging in that timeframe. Virgin Media has achieved just over 50% of its roll-out target and as set out in the 2024 WLA/WCA Decision VMI FTTP rollout figures may be characterised by unevenness and irregularity, such that reporting in one period may not give reliable indicators of activity in subsequent periods. Its target of completing its roll-out by the end of 2026 appears challenging.
34. Figure 2 shows that the take-up rates³⁴ for NOs, apart from Virgin Media, have increased from 2020, although we note its take-up rates are impacted by the variability in its FTTP roll-out over time.
35. As of Q3 2025 Eircom had the highest FTTP take-up rate at 38.6%, up from 30.8% in Q1 2023. In Q3 2025 NBI had FTTP take up rates of 35.2%, up from 27.6% in Q1 2023. SIRO's FTTP take-up rate stood at 31.2% in Q3 2025, down marginally from 31.7% in Q1 2023. Virgin Media's FTTP take up rate has seen upward and downward changes over time and stood at 17.6% in Q3 2025.

³⁴ Take-up rate is measured by dividing active lines by the total number of premises passed by a NO.

3 Fixed Retail Broadband Trends and Developments

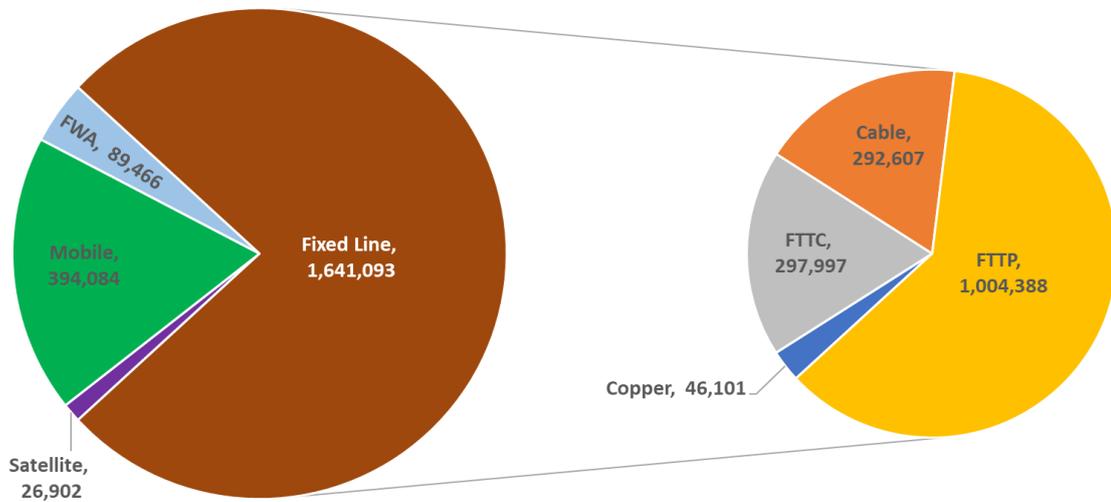
3.1 Introduction

36. In the 2024 WLA/WCA Decision³⁵, 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.
37. 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.
38. 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 2025, noting that the period Q1 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 available³⁶. 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.
39. As illustrated in Figure 3, fixed (or wired) broadband lines represented over three quarters (76.3%) of all broadband lines in Q3 2025 (compared to 76.1% in Q1 2023).

³⁵ See section 4 of the 2024 WLA/WCA Decision.

³⁶ As gathered quarterly by ComReg from SPs using its statutory information gathering powers.

Figure 3: Number of all broadband subscriptions (measured by lines) by platform, Q3 2025



40. 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 4: Number of Fixed Broadband Lines by Platform, Q1 2020 to Q3 2025

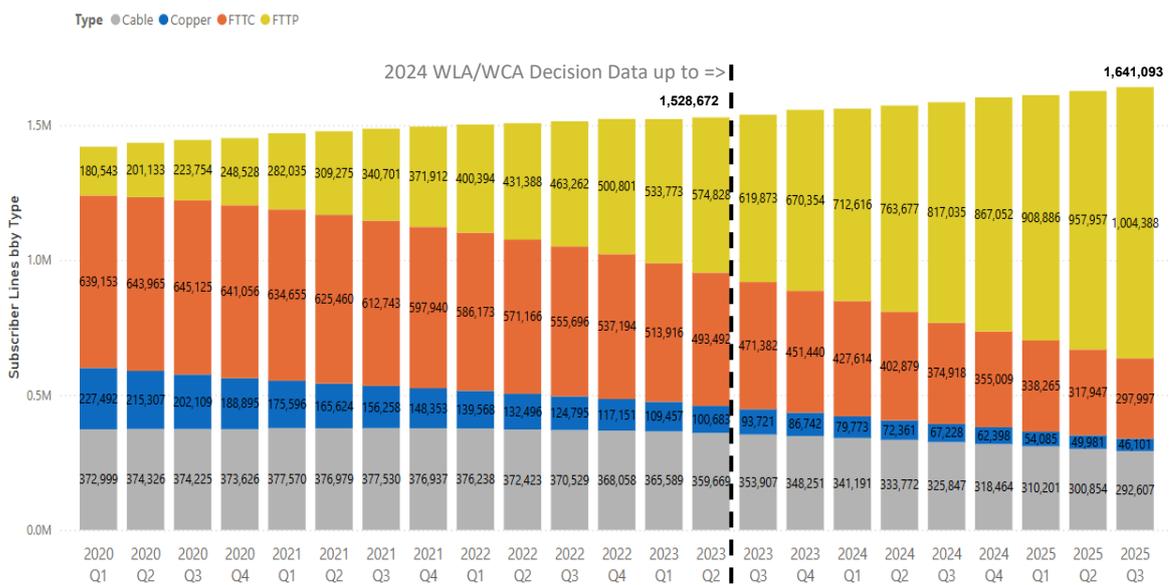
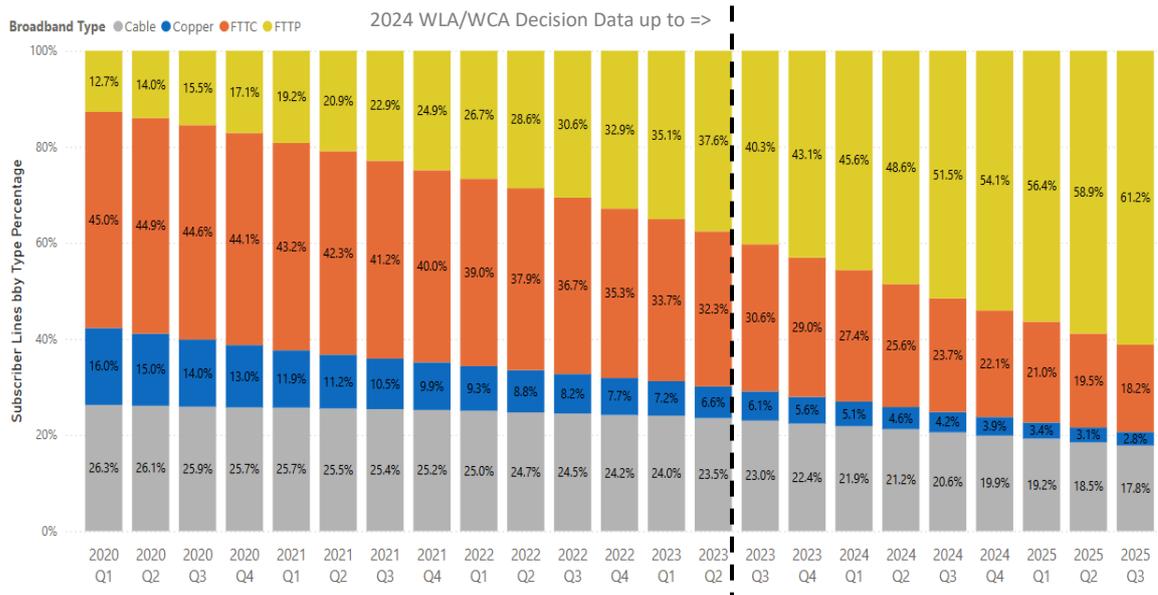


Figure 5: Percentage share of Fixed Broadband lines by platform Q1 2020 to Q3 2025

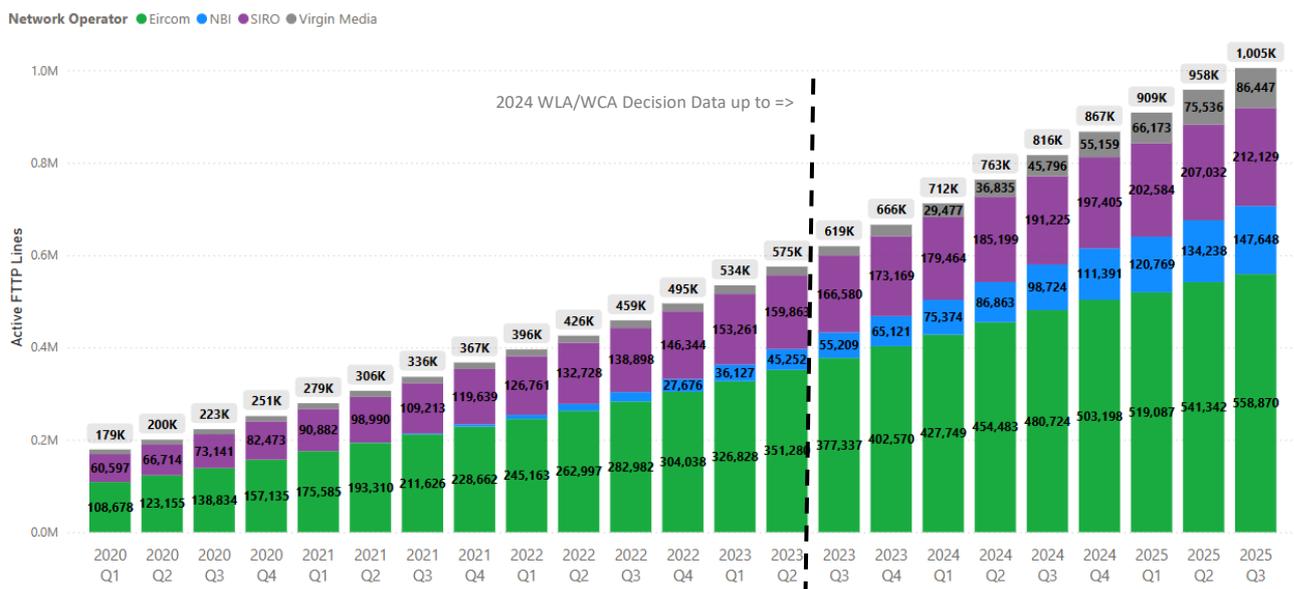


41. Figure 4 and Figure 5 above, in terms of the percentage of lines falling within each type of broadband platform, the trends identified in the 2024 WLA/WCA Decision have continued, namely:
- (a) Over the period Q1 2020 to Q2 2023 the percentage of fixed broadband lines provided over FTTP increased from 12.7% to 37.6%, with this having increased since then by a further 23.6 p/p to 61.2% as at Q3 2025.
 - (b) Over the period Q1 2020 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 14.1 p/p to 18.2% as at Q3 2025.
 - (c) Over the period Q1 2020 to Q2 2023 the percentage of fixed broadband lines provided over cable fell from 26.3% to 23.5%, with this having fallen by a further 5.7 p/p to 17.8% as at Q3 2025.
 - (d) Over the period Q1 2020 to Q2 2023 the percentage of fixed broadband lines provided over copper fell from 16% to 6.6%, with this having fallen by a further 3.8 p/p to 2.8% as at Q3 2025.

3.2 Retail FTTP Developments

- 42. ComReg now considers developments with respect to FTTP. In terms of FTTP subscribers, Figure 6 below sets out the number of active FTTP retail subscriber lines by NO, with Figure 7 expressing this in percentage terms.
- 43. Overall, the number of active FTTP lines has continued to grow, rising from 575K lines in Q2 2023 to just over one million in Q3 2025, which is an increase of 430K overall since then.

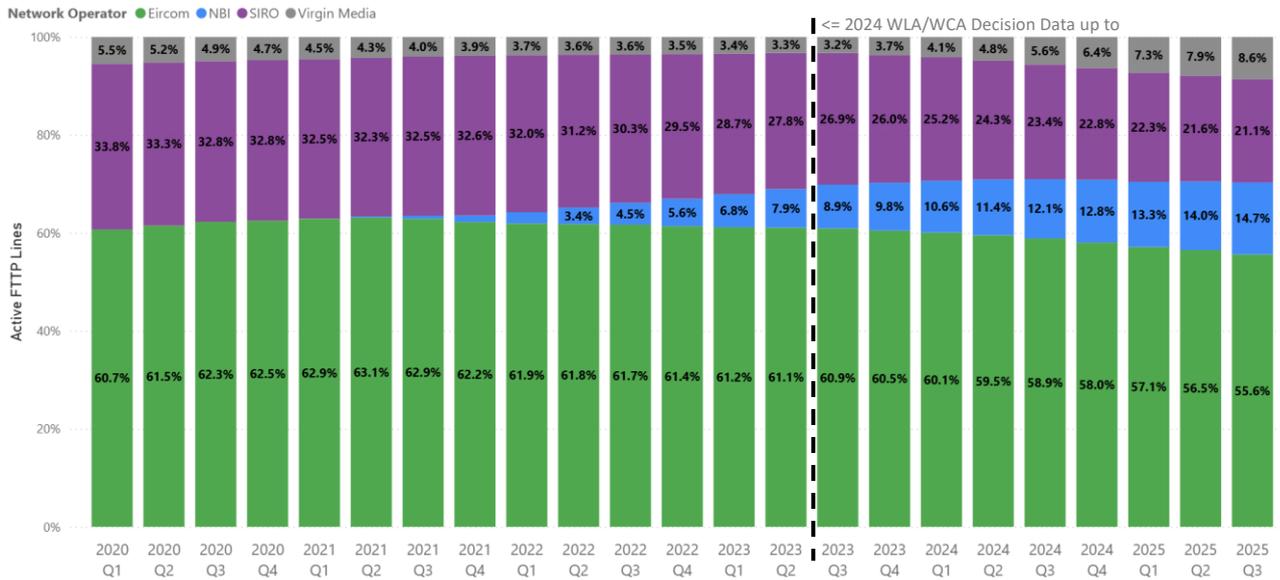
Figure 6: Number of Active Retail FTTP Broadband Lines, by Network Operator, Q1 2020 to Q3 2025³⁷



³⁷ Note, Magnet networks, which began reporting active FTTP lines in Q2 2024, is excluded from this figure. Magnet had 1,559 active FTTP lines as at Q3 2025. Furthermore, there are discrepancies between the number of active FTTP lines reported in

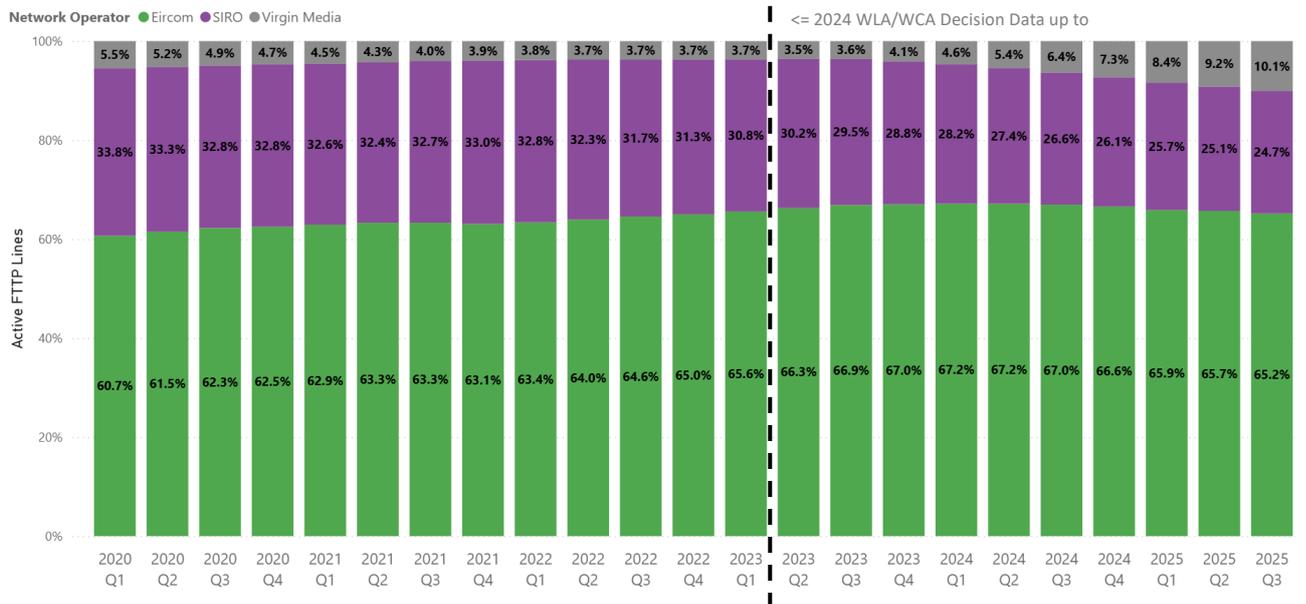
Figure 4 as it is calculated based on retail operator submissions, whereas this Figure is based on what the Network operators reported they sold. These discrepancies can arise due to timing of reported active lines by SPs.

Figure 7: National Percentage Shares of Active Retail FTTP Broadband Lines, by Network Operator, Q1 2020 to Q3 2025



44. **Figure 7** Figure 7 above shows that as at Q3 2025 Eircom, at 55.6%, continues to have the largest share of FTTP subscribers on its network having declined from 61.1% in Q2 2023. SIRO’s FTTP market share stood at 21.1% as at Q3 2025, having declined from 27.8% at the end of Q2 2023.
45. NBI’s share of active FTTP broadband lines on its network has increased from 7.9% in Q2 2023 to 14.7% in Q3 2025. Virgin Media’s share stood at 8.6% in Q3 2025 having risen from 3.3% in Q2 2023.
46. 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 would be to consider the position of Eircom, SIRO and Virgin Media only as NBI are generally not competing with the other NOs for customers.

Figure 8: Percentage Share of Active Retail FTTP Broadband Lines by Network Operator, Q1 2020 to Q3 2025, Eircom, SIRO and Virgin Media Only



47. Figure 8 above – which excludes NBI – shows that as at Q3 2025 Eircom had a 65.2% share of FTTP subscribers on its network, with this being a slight decline on its position in Q2 2023 where it was 66.3%. SIRO’s share stood at 24.7% as at Q3 2025, having declined from 30.2% at the end of Q2 2023. Virgin Media’s share stood at 10.1% in Q3 2025 having increased from 3.5% at Q2 2023³⁸.
48. Overall, since the 2024 WLA/WCA Decision, Eircom’s share of FTTP (excluding NBI active lines) has marginally decreased by 1.1 p/p, while SIRO has seen a 5.5 p/p decrease over the same period, with Virgin Media’s FTTP share showing a 6.6 p/p increase. Figure 9, 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 Q1 2020 to Q3 2025.

³⁸ As set out in Figure 4, over this same period Virgin Media’s Cable broadband active lines decreased from 359,669 lines in Q2 2023 to 292,607 lines in Q3 2025 (a decline of 67,062 lines or 18.6%).

Figure 9: Number of Retail Fixed Broadband Lines by Retail SP, Q1 2020 to Q3 2025

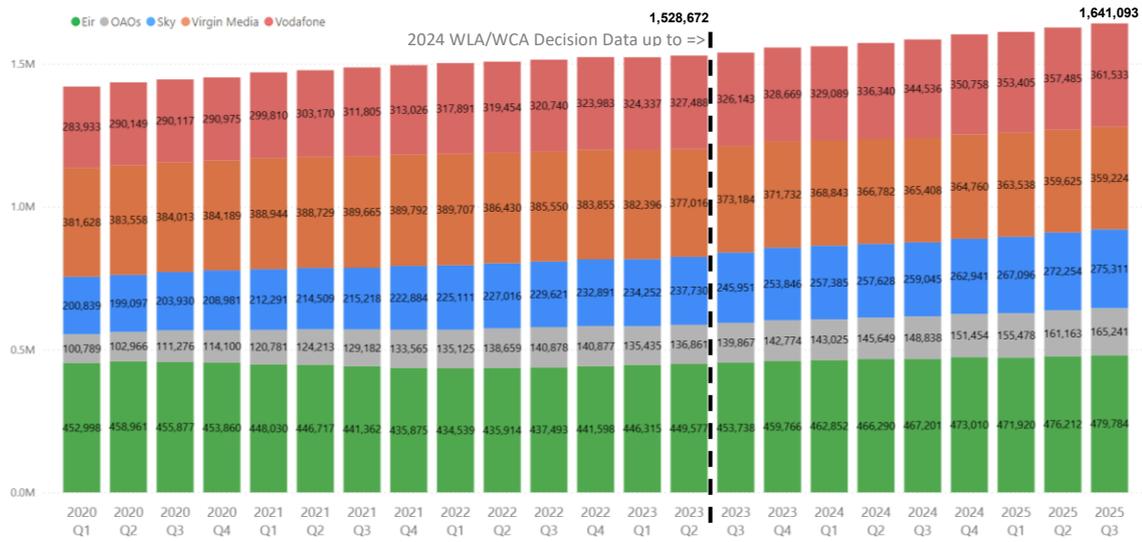
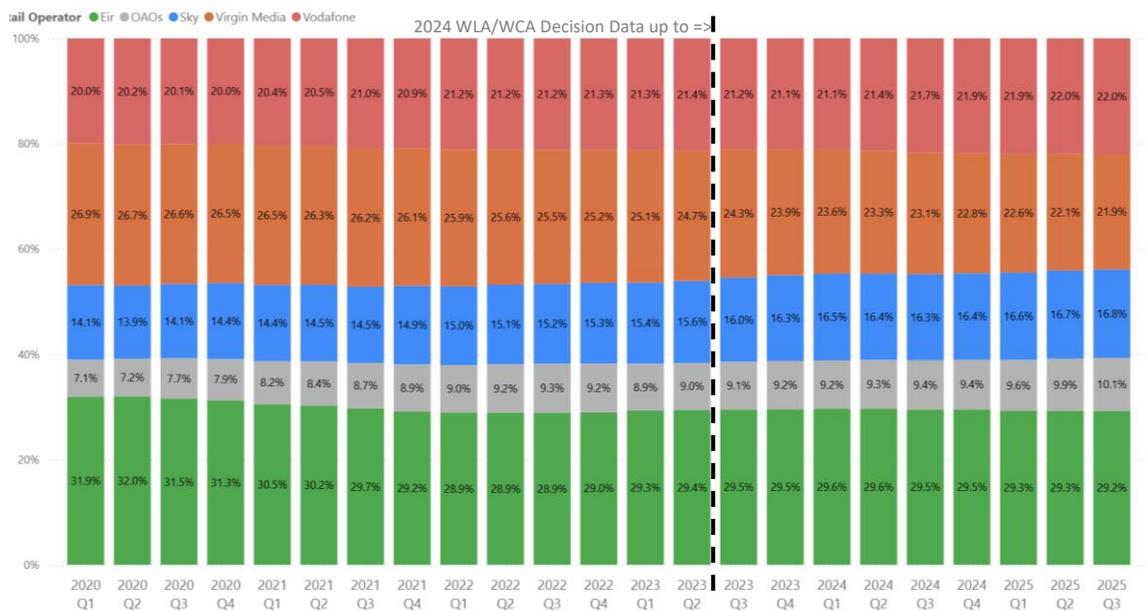


Figure 10: Percentage Share of Retail Fixed Broadband Lines by Retail SP, Q1 2020 to Q3 2025



49. As can be seen above, at the end of Q3 2025, nearly 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)').

50. In Q2 2023 Eircom had a market share of 29.4% of all fixed broadband retail lines³⁹ followed by Virgin Media at 24.7%, Vodafone at 21.4% and Sky at 15.6%. At Q3 2025 the market shares of most of these SPs have remained relatively unchanged at 29.2%, 21.9%, 22.0% and 16.8% respectively, with the exception of the 2.8 p/p drop in Virgin Media's share.

3.3 Conclusions on Fixed Retail Broadband Trends and Developments

51. Overall, retail market developments are broadly in line with the trends identified in the 2024 WLA/WCA Decision.
52. 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 61.2% of all fixed broadband lines, is now the largest fixed broadband platform, having grown by 23.6% p/p since Q2 2023.
 - (b) FTTC and CATV based broadband lines have declined since Q2 2023 to stand at 18.2% (-14.1 p/p) and 17.8% (-5.7 p/p) share respectively of all fixed broadband lines, and
 - (c) CG broadband provided over copper now constitutes just 2.8% of total broadband lines.
53. In looking at the FTTP broadband platform only, when considering all NOs shares, Eircom's share of FTTP lines has declined nationally by 5.5 p/p to 55.6% over the period Q2 2023 to Q3 2025, and it remains the largest NO. SIRO's network share has declined by 6.7 p/p to 21.1%, with Virgin Media and NBI increasing to 8.6% (+5.3 p/p) and 14.7% (+6.8 p/p) respectively.
54. 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 2025 Eircom's FTTP network market share decreased marginally to 65.2% (-1.1 p/p), SIRO's declined to 24.7% (down 5.5 p/p), and Virgin Media's market share increased to 10.1% (+6.6 p/p).
55. Overall, Retail SPs' broadband market shares have also been relatively stable since the 2024 WLA/WCA Decision, save for Virgin Media's which dropped by 2.9 p/p.

³⁹ It should be noted that this is in the presence of SMP regulation of the WLA Market.

4 WLA Broadband Market Trends and Developments

4.1 Introduction

56. 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 2.1 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. Eircom was found to have SMP in the Commercial NG WLA Market only and information provided below is in this context.
57. 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.
58. 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 Eircode's 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.

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.

4.2 Commercial NG WLA Market

59. 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.
60. 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, as well as to Q3 2024 being the reference period used in the Market Monitoring Report – Issue 1. The retail CGA and WCA data in the 2024 WLA/WCA Decision are based on Q2 2023 data.

4.2.1 Market Shares

61. Figure 11 below shows the Commercial NG WLA Market shares from Q1 2023 to Q3 2025. The first noteworthy aspect is the number of active lines in the Commercial NG WLA Market has increased from 936,965⁴² in Q1 2023 to 1,092,672 in Q3 2025 – and increase of 16.6%.
62. Over this time, in terms of NG WLA active lines, Eircom has added a net 16,076 lines, SIRO a net 55,905 lines and Virgin Media 82,220 lines.⁴³
63. Figure 11 below shows the change in market shares since the data points used in the 2024 WLA/WCA Decision (Q1 2023 to Q3 2025) 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 11 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') network⁴⁴ which was not capable of supporting NG WLA services (its FTTP network is now based on XGS PON technology).

⁴² This was erroneously cited as 953,199 in Paragraph 69 in Market Monitoring Report – Issue 1. This was because this total figure used an earlier estimate for the number of addresses in the Commercial NG WLA Market without Eircodes. However, the total used in Figure 10: Commercial NG WLA Market Shares in Market Monitoring Report – Issue 1 is correct.

⁴³ Virgin Media's active Cable lines, which are not included in the Commercial NG WLA Market, reduced from 359,669 to 292,607 lines over this period, a decline of 67,062 lines.

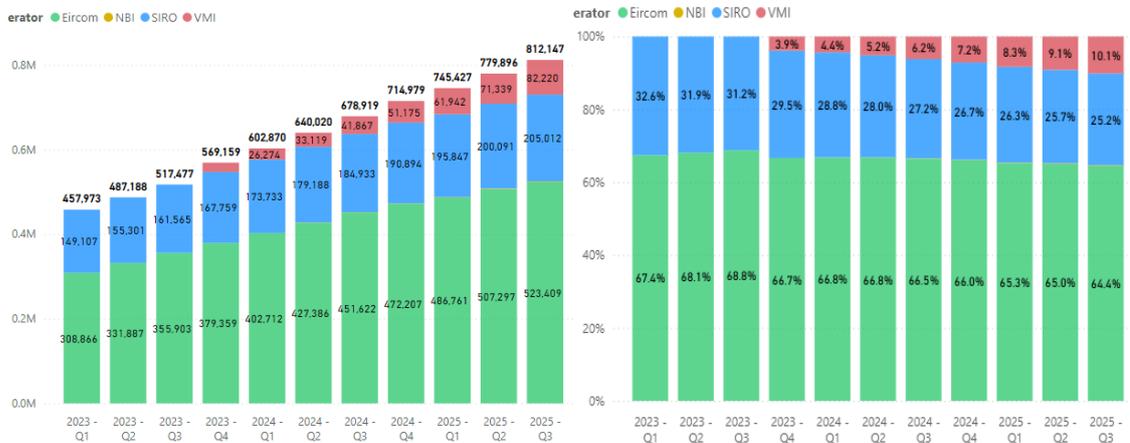
⁴⁴ See paragraph 3.43 of the 2024 WLA/WCA Decision.

Figure 11: Commercial NG WLA Market – Network Operator Market Shares⁴⁵



64. In terms of market shares and noting the above growth overall in the size of the market, Eircom’s share in the Commercial NG WLA Market has dropped from 84.1% to 73.6% (down 10.5 p/p), SIRO’s has increased 2.9 p/p from 15.9% to 18.8% and Virgin Media’s⁴⁶ has increased from zero to 7.5%.⁴⁷
65. 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 Market⁴⁸



⁴⁵ Note, figures/market shares for NBI are not visible on the charts given they are very low. NBI had 1,506 active FTTP NG WLA lines in the Commercial NG WLA Market as at Q3 2025. This figure was – by definition – zero in Q1 2023.

⁴⁶ In Q1 2023 at the time of the data used in the 2024 WLA/WCA Decision, Virgin Media had 18,782 active lines on its RFOG based FTTP network – with RFOG not capable of providing NG WLA services. See Section 3.3.2 of the WLA/WCA Decision for details.

⁴⁷ In the Market Monitoring Report - Issue 1, the number of NBI lines in the Commercial Area as of Q3 2024 were trivial (151) and were omitted. However, they are included in this Issue 2 report for completeness.

⁴⁸ NBI figures/shares are not visible in this Figure given they are very low. NBI had 1,506 active FTTP NG WLA lines in the Commercial NG WLA Market as at Q3 2025 (representing 0.15% of all lines).

- 66. The total number of active FTTP WLA lines has grown from 457,973 to 812,147 in the period Q1 2023 to Q3 2025, an increase of 354,174 lines. Eircom has increased its active FTTP lines from 308,866 lines to 523,409 lines over this period (up 71,787 lines since Q3 2024), accounting for 64.4% of all FTTP subscriber lines in the Commercial NG WLA Market.
- 67. SIRO’s market share of active FTTP lines in Q3 2025 fell to 25.2% (up 20,079 lines since Q3 2024) and Virgin Media’s grew to 10.1% (up 40,353 lines since Q3 2024).⁴⁹
- 68. Figure 13 below shows the wholesale only (merchant market) supply in the Commercial NG WLA Market, i.e., excluding self-supply for own retail use.

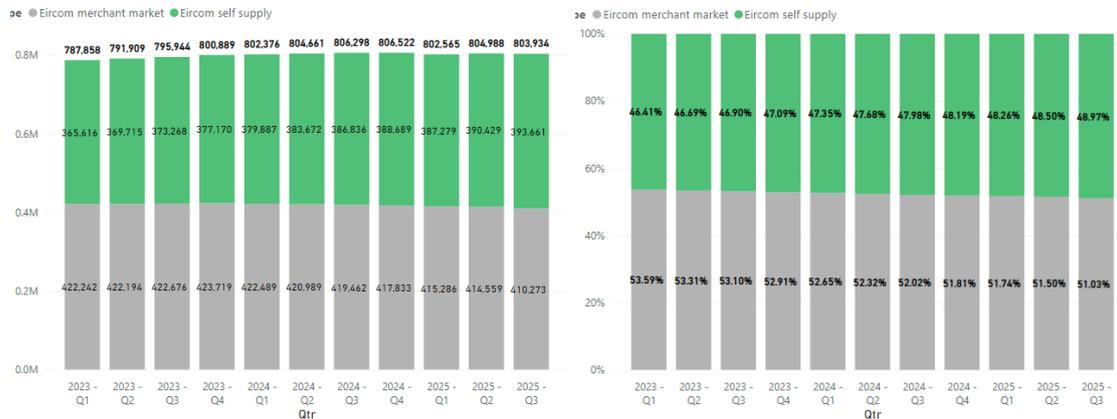
Figure 13: Wholesale only (merchant market) supply in the Commercial NG WLA Market



- 69. As can be seen above the total number of wholesale only (merchant market) lines in the Commercial NG WLA Market (FTTC and FTTP) has grown from 571,349 lines in Q1 2023 to 643,290 lines in Q3 2025. This is a growth of 12.6% over this period. Eircom has seen a decline in its number of active wholesale only lines sold to other operators, falling from 422,242 in Q1 2023 to 410,273 in Q3 2025, with its share of wholesale only active lines having declined from 73.9% to 63.8%. SIRO, on the other hand, who is a wholesale only NO, saw growth in the number of its active lines, rising from 149,107 in Q1 2023 to 205,012 in Q3 2025. This has resulted in SIRO’s market share of total wholesale only sales growing from 26.1% in Q1 2023 to 31.9% in Q3 2025. Finally, Virgin Media Ireland commenced offering wholesale services in Q4 2023 and had 26,499 wholesale only active lines in Q3 2025, representing 4.1% of total wholesale only sales in Q3 2025.

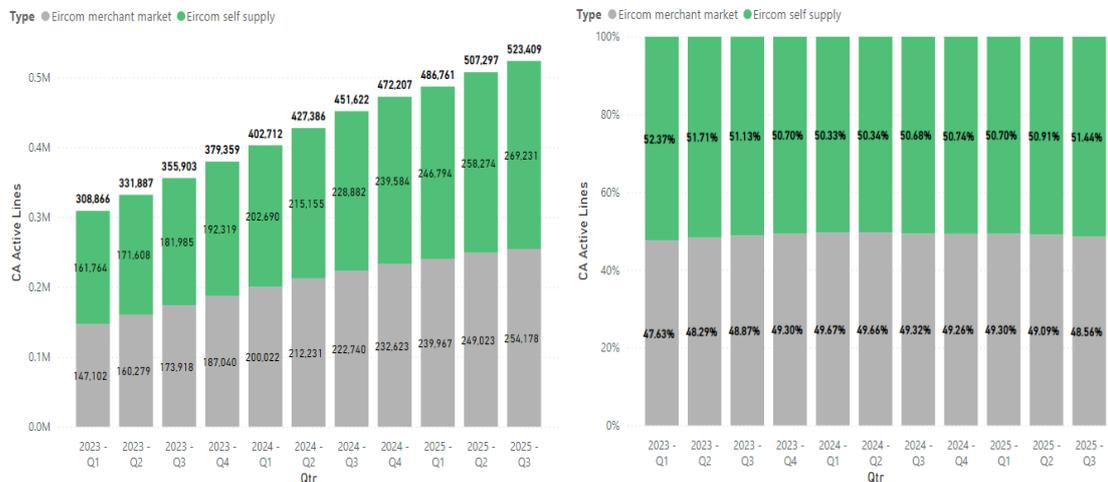
⁴⁹ Figure 29 in Annex 1 below shows hypothetical market shares when Virgin Media’s cable network is included these calculations. It indicates that the total number of active lines grew from 1.317 million lines in Q1 2023 to 1.384 million lines in Q3 2025. Over this period, Eircom and Virgin Media, would have seen a hypothetical decline in market shares of 1.7% and 1.8%, respectively. SIRO would see its hypothetical market share grow by 3.5%.

Figure 14: Eircom’s NG WLA Wholesale and Self-Supply (Active Lines) in the Commercial NG WLA Market



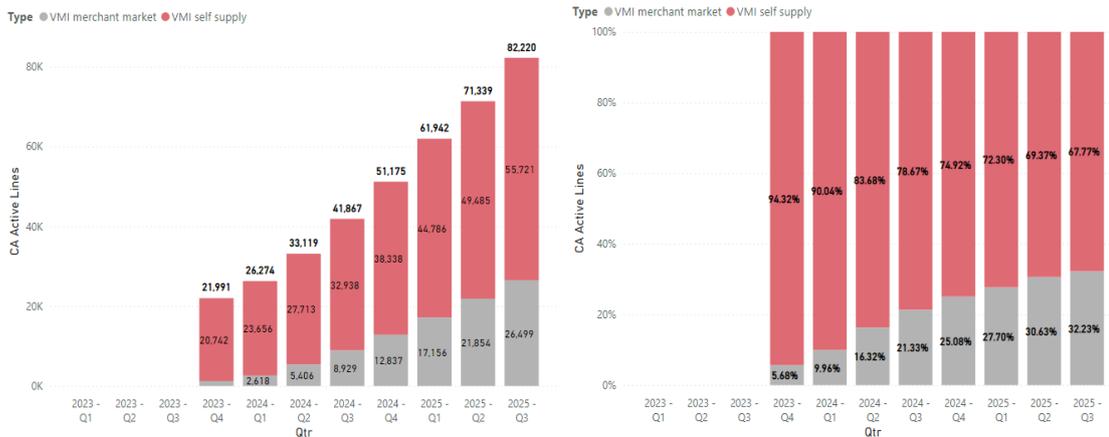
70. Figure 14 above shows Eircom’s self-supply (to its retail arm) and wholesale only (merchant market) supply of NG WLA (FTTC and FTTP) has increased from 787,858 to 803,934 active lines over the period Q1 2023 to Q3 2025. Its self-supply to its retail arm accounted for 49% of its overall sales in Q3 2025, up from 46.4% in Q1 2023.

Figure 15: Eircom’s FTTP Only NG WLA Wholesale and Self-Supply (Active Lines) in the Commercial NG WLA Market



71. Looking at the FTTP sales only, Figure 15 above shows Eircom’s self-supply (to its retail arm) and wholesale (merchant market) supply of FTTP has increased from 308,866 to 523,409 active lines over the period Q1 2023 to Q3 2025. Its self-supply accounted for 51.4% in Q3 2025, down from 52.4% in Q1 2023.

Figure 16: Virgin Media’s NG WLA Wholesale and Self-Supply (Active Lines) in the Commercial NG WLA Market



72. Figure 16 above shows Virgin Media’s Self-Supply and Merchant Market Supply for FTTP from Q4 2023 (when it commenced merchant market sales) to Q3 2025. It has grown in that time to 26,449 FTTP lines and now represents 32.23% of its overall FTTP sales in Q3 2025 with 67.77% of FTTP sales to its retail arm.

4.2.2 Network Overlaps

73. ComReg now considers changes in NG WLA coverage within the Commercial NG WLA Market over the period Q1 2023 to Q3 2025. Within this market, Eircom’s NG WLA (FTTC or FTTP) network presence is considered ubiquitous, although as noted in section 2.3 above, its FTTP coverage passes 1.45m premises nationally as at Q3 2025.
74. 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.
75. Eircom’s FTTP coverage in the Commercial NG WLA Market is 68.6% of premises as at Q3 2025, having risen from 54.1% in Q1 2023.
76. 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^{50, 51}.

⁵⁰ As mentioned in paragraph 68 46 above, NBI also has a small FTTP network presence in the Commercial NG WLA Market. Given it is negligible, it is not considered here.

⁵¹ See Section 4.2 of the 2024 WLA/WCA Decision for details.

77. Figure 17 below shows the number of known addresses where only one Network Operator is available as well as those where multiple NG WLA networks are available as at Q3 2025, i.e., those premises where Eircode based data shows that they have one or more than one network available in the Commercial NG WLA Market. Each grouping is mutually exclusive.⁵²

Figure 17: Commercial NG WLA Market Network Overlaps, including no overlaps

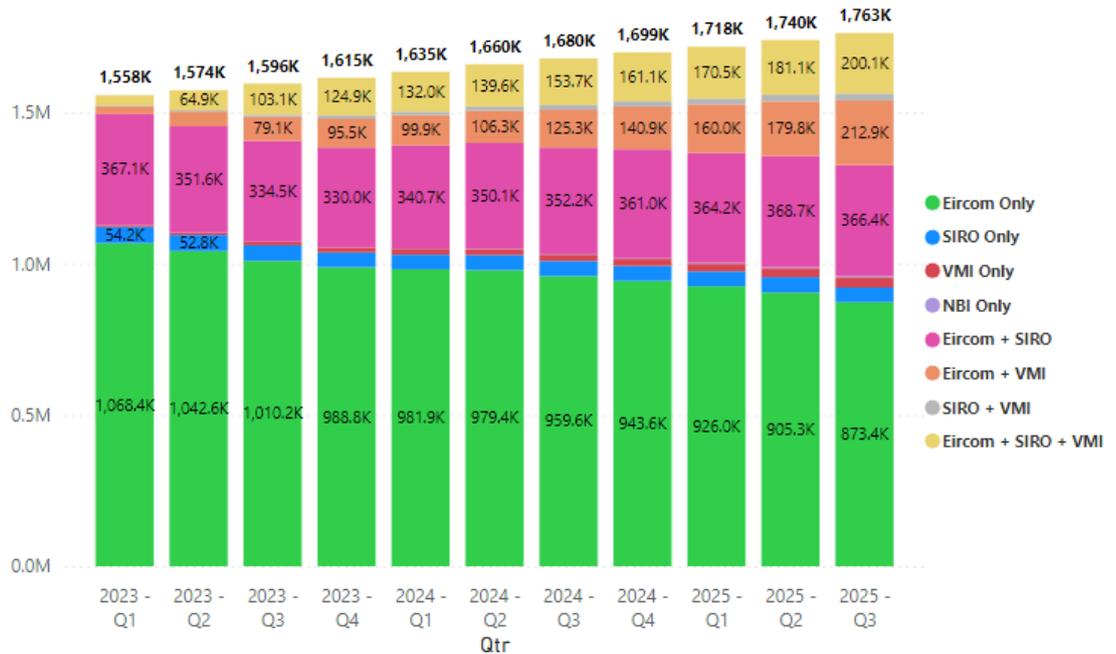


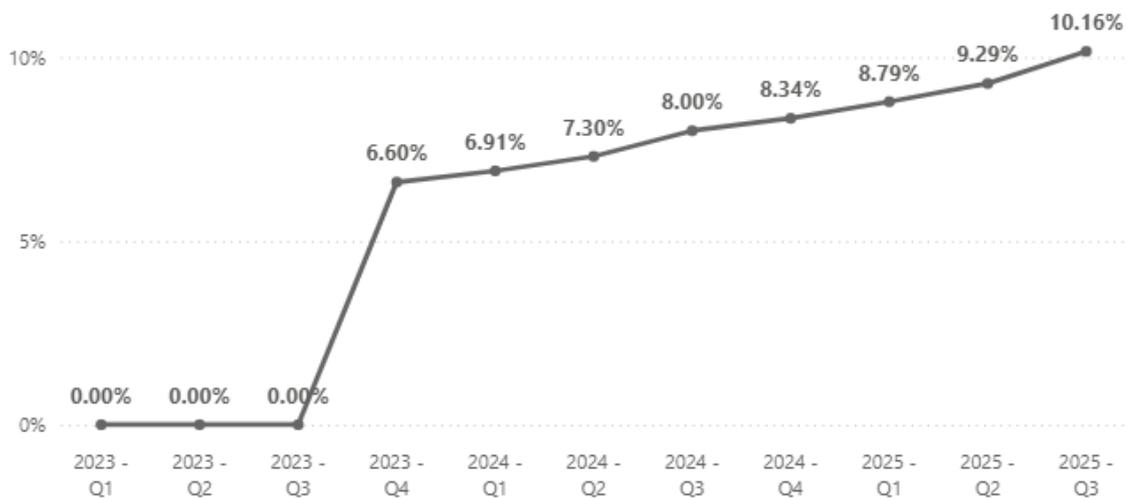
Table 3: Commercial NG WLA Market Network Overlaps, including no overlaps

Qtr	Eircom Only	SIRO Only	VMI Only	NBI Only	Eircom + SIRO	Eircom + VMI	SIRO + VMI	Eircom + SIRO + VMI	Eircom + NBI	SIRO + NBI	VMI + NBI	Eircom + SIRO + NBI	Eircom + VMI + NBI	SIRO + VMI + NBI	Eircom + SIRO + VMI + NBI
2025 - Q3	873,436	48,203	33,811	4,875	366,375	212,917	23,502	200,134	727	24	0	21	7	0	9
2025 - Q2	905,276	50,802	29,311	3,448	368,719	179,831	21,749	181,100	497	19	0	20	0	0	0
2025 - Q1	926,031	49,126	25,234	2,819	364,248	159,981	19,742	170,466	394	19	0	20	0	0	0
2024 - Q4	943,626	49,657	22,725	1,990	360,995	140,903	18,409	161,122	260	22	0	12	0	0	0
2024 - Q3	959,631	49,929	20,778	1,617	352,224	125,278	16,385	153,717	232	11	0	11	0	0	0
2024 - Q2	979,364	49,939	19,222	1,235	350,104	106,296	14,411	139,575	162	9	0	4	0	0	0
2024 - Q1	981,914	48,583	19,668	745	340,697	99,939	11,778	132,028	88	2	0	2	0	0	0
2023 - Q4	988,818	48,858	16,412	240	330,011	95,462	10,747	124,940	46	0	0	1	0	0	0
2023 - Q3	1,010,204	51,447	10,460	38	334,540	79,102	7,560	103,102	1	0	0	0	0	0	0
2023 - Q1	1,068,363	54,246	5,973	0	367,098	24,976	3,102	33,918	0	0	0	0	0	0	0
2023 - Q2	1,042,638	52,791	7,814	0	351,627	48,889	4,897	64,935	0	0	0	0	0	0	0

⁵² Figures are mutually exclusive. For example, the ‘SIRO + Virgin Media’ figure is not included in the ‘Eircom + SIRO + Virgin Media’ figure.

78. As can be seen in Figure 17 and Table 3, 200,143 premises have NG WLA services from Eircom, SIRO and Virgin Media available, which is 11.4% of the total passed premises in the Commercial NG WLA Market.⁵³ Furthermore, 566,539 premises in the Commercial NG WLA Market have Eircom and SIRO available (32.1%), 413,067 premises have Eircom and VMI available (23.4%). Moreover, SIRO and Virgin Media are available at 223,645 premises (12.7%).
79. As of Q3 2025, 873,436 premises have only Eircom NG WLA services available (no other NO is present), down from 1,068,363 in Q1 2023. The corresponding figures for SIRO and Virgin Media are 48,203 and 33,811 respectively.
80. Figure 18 below sets out the percentage of all premises in the Commercial Area⁵⁴ that are passed by three NG WLA networks, over the period from Q1 2023 to Q3 2025 with this showing that the number of premises now passed by three NG WLA Networks (FTTC included)⁵⁵ has risen from 0% of premises in Q1 2023 to 10.16% of premises (200,143) in Q3 2025.

Figure 18: Share of Premises Passed by 3 NG WLA networks in the Commercial Area – Q1 2023 to Q3 2025



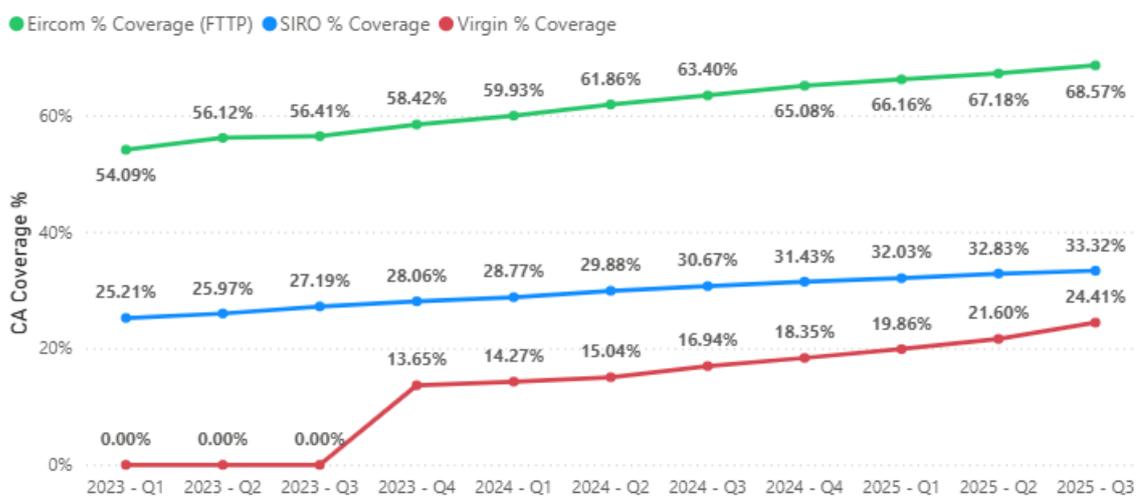
⁵³ Please note that this percentage is different from the one detailed in Figure 18 below. This is because this is expressed as the percentage of the premises in the Commercial NG WLA Market excluding those of premises at which no NG WLA services are available. Figure 18 below shows the coverage expressed as a percentage of the number of premises with three networks present on the entire Commercial Area. This differs from Figure 17 above by 202,697 as the Commercial Area is comprised of the total number of premises in the State minus the premises in the NBP Intervention Area.

⁵⁴ As set out in paragraph 63 above, Virgin Media's RFOG network was not capable of supporting NG WLA services until Q3 2024. As such, even though it had passed some premises prior to that, they were not considered part of the Commercial NG WLA market.

⁵⁵ Noting the proviso that Eircom may have FTTC premises with no Eircode at these locations

81. 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.⁵⁶
82. Looking at the FTTP space alone, i.e., without FTTC, Figure 19 below charts the increase in the FTTP coverage of Eircom, SIRO and Virgin Media in the Commercial NG WLA Market. This shows that as of Q3 2025 SIRO's coverage stood at 33.3% having risen from 25.21% in Q1 2023 (+8.1 p/p) and, as set out in section 2.3 above has achieved 97% of its revised overall FTTP roll-out target. Virgin Media's FTTP coverage is 24.4% having risen from 0% in Q1 2023 and, as set out in section 2.3 above has achieved 50% of its overall FTTP roll-out target.
83. Please note that in the Wholesale Monitoring Report – Issue 1 ComReg included MEAs where Virgin Media's FTTP network was present in the periods Q1 2023 to Q3 2023, despite it not yet offering wholesale services at that time. However, as this FTTP network was not made available for NG WLA services until Q4 2023, they have been properly omitted from this Issue 2 Report.

Figure 19: FTTP Only NG WLA Network Coverage in the Commercial NG WLA Market – Q1 2023 to Q3 2025



84. The increase in coverage of SIRO's and Virgin Media's FTTP networks⁵⁷ is broadly in line with the anticipated trends set out in the 2024 WLA/WCA Decision, although as noted in section 2.3 above SIRO's publicly quoted roll-out target has decreased from 770K premises to 700K premises.⁵⁸

⁵⁶ See Section 6.5 of the 2024 WLA/WCA Decision for more details.

⁵⁷ Please note the omission of Virgin Media's FTTP network from the Commercial NG WLA Market as per paragraph 83 above.

⁵⁸ See Section 3.2 of the 2024 WLA/WCA Decision for details.

85. Figure 20 below shows the number of premises in the Commercial NG WLA Market that are passed by more than one FTTP network at Q3 2025.

Figure 20: FTTP Network Overlaps in the Commercial NG WLA Market, including no overlaps

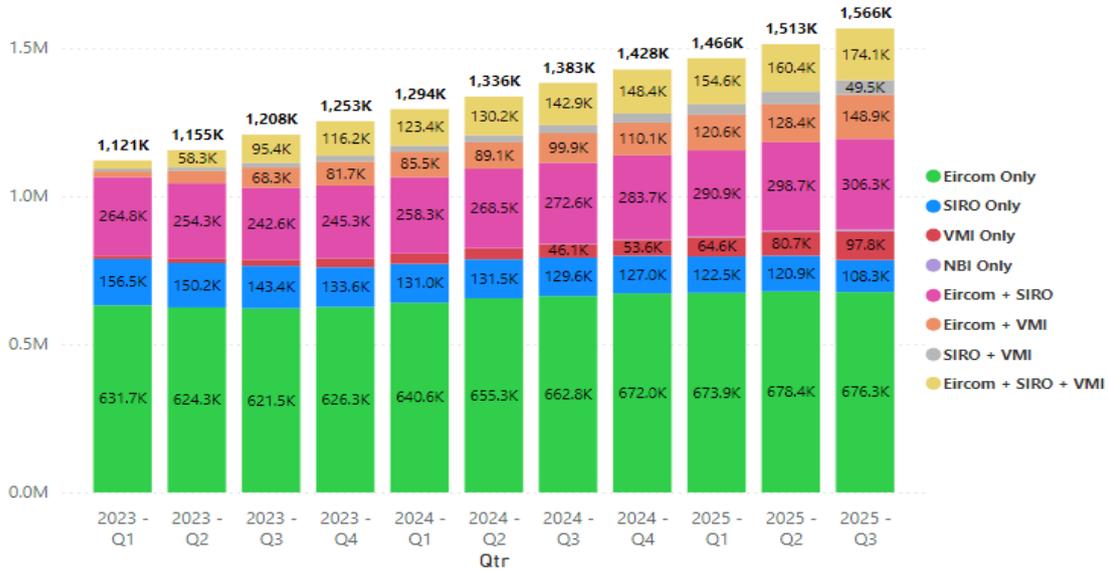


Table 4: FTTP Network Overlaps in the Commercial NG WLA Market, including no overlaps

Qtr	Eircom Only	SIRO Only	VMI Only	NBI Only	Eircom + SIRO	Eircom + VMI	SIRO + VMI	Eircom + SIRO + VMI	Eircom + NBI	SIRO + NBI	VMI + NBI	Eircom + SIRO + NBI	Eircom + VMI + NBI	SIRO + VMI + NBI	Eircom + SIRO + VMI + NBI
2025 - Q3	676,270	108,305	97,833	5,001	306,273	148,895	49,521	174,115	601	27	0	18	7	0	9
2025 - Q2	678,429	120,864	80,706	3,548	298,657	128,436	42,460	160,389	397	25	0	14	0	0	0
2025 - Q1	673,881	122,500	64,597	2,898	290,874	120,618	35,622	154,586	315	25	0	14	0	0	0
2024 - Q4	671,959	126,958	53,561	2,040	283,694	110,067	31,133	148,398	210	24	0	10	0	0	0
2024 - Q3	662,769	129,598	46,136	1,662	272,555	99,920	27,213	142,889	187	13	0	9	0	0	0
2024 - Q2	655,253	131,527	36,427	1,265	268,516	89,091	23,770	130,216	132	10	0	3	0	0	0
2024 - Q1	640,579	131,014	34,148	760	258,266	85,459	20,393	123,413	73	3	0	1	0	0	0
2023 - Q4	626,330	133,576	30,145	247	245,293	81,729	19,442	116,245	39	0	0	1	0	0	0
2023 - Q3	621,476	143,362	21,275	39	242,625	68,287	15,232	95,430	0	0	0	0	0	0	0
2023 - Q1	631,690	156,506	11,571	0	264,838	19,378	9,138	27,882	0	0	0	0	0	0	0
2023 - Q2	624,344	150,165	15,014	0	254,253	41,689	11,569	58,263	0	0	0	0	0	0	0

86. As can be seen from Figure 20 and Table 4 above, Eircom, SIRO and Virgin Media overlap at 174,115 premises, which is 11.1% of all premises in the Commercial NG WLA Market, while only SIRO and Eircom overlap at 306,273 premises (19.6%); only Virgin Media and Eircom overlap at 148,895 (9.5%) and only Virgin Media and SIRO overlap at 49,521 premises (3.2%) and there is no Eircom FTTP present. Moreover, Virgin Media and Siro overlap at 223,645 premises (12.7%) in Q3 2025, up from 37,020 in Q1 2023 (2.4%).

87. Furthermore, there are 676,270 premises with only Eircom FTTP available in the Commercial NG WLA Market in Q3 2025, up from 631,690 in Q1 2023. The corresponding figures for where there is SIRO and Virgin Media only are 108,305 and 97,833 respectively in Q3 2025.

4.2.3 Coverage and Market Shares based on the Size of MEAs

88. 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.
89. Table 5 below groups MEAs in the Commercial NG WLA Market by the number of premises in them. This sets out changes in this data between Q1 2023 and Q3 2025, looking at this by broadband platform and by NO⁵⁹.
90. In total, as of Q3 2025, there are 1,183 Commercial Area MEAs, covering 1,969,950 premises. At these premises, as of Q3 2025 there were 1,092,672 active NG WLA services (up from 953,183 in Q1 2023); 280,516 of which were FTTC based services (down from 478,983 in Q1 2023) and 812,018 were FTTP based services (up from 474,200 in Q1 2023).

Table 5: Commercial Area MEAs by Size: Overview, Active Lines – Q1 2023 to Q3 2025

MEA Size Range	MEA Count	CA Premises	Total NG Active Lines Q1 2023	FTTC Active Lines Q1 2023	FTTP Active Lines Q1 2023	Total NG Active Lines Q3 2024	FTTC Active Lines Q3 2024	FTTP Active Lines Q3 2024	Total NG Active Lines Q3 2025	FTTC Active Lines Current Q3 2025	FTTP Active Lines Current Q3 2025
0 - 1,000	853	312,529	171,354	66,966	104,388	182,951	56,518	126,433	190,185	43,524	146,661
1,001 - 2,500	157	233,779	133,737	66,103	67,634	142,040	45,068	96,972	146,952	33,065	113,887
2,501 - 4,000	44	141,613	83,712	45,286	38,426	89,586	29,781	59,805	93,767	22,036	71,731
4,001 - 5,500	30	140,189	74,819	39,320	35,499	80,750	25,671	55,079	83,724	19,833	63,891
5,501 - 7,000	22	137,857	69,282	32,978	36,304	75,465	23,672	51,793	80,456	18,786	61,670
7,001 - 8,500	13	97,912	55,750	23,661	32,089	61,098	16,664	44,434	64,248	13,396	50,852
8,501 - 10,000	5	44,985	18,809	10,423	8,386	20,930	7,309	13,621	22,270	5,982	16,288
10,001 - 12,500	19	218,348	100,552	53,979	46,573	107,552	42,548	65,004	112,860	35,563	77,297
12,501 - 15,000	18	248,089	116,066	55,519	60,547	127,014	40,025	86,989	135,056	32,284	102,772
15,001 - 17,500	8	128,214	38,195	26,901	11,294	42,695	21,271	21,424	46,232	17,574	28,658
17,501 - 20,000	6	109,592	41,226	25,099	16,127	45,872	18,804	27,068	49,337	15,649	33,688
> 20,001	8	156,843	49,681	32,748	16,933	57,483	27,338	30,145	67,447	22,824	44,623
Total	1183	1,969,950	953,183	478,983	474,200	1,033,436	354,669	678,767	1,092,534	280,516	812,018

91. As can be seen, the majority of MEAs – 853 – have 1,000 premises or less and at the other end of the band, 8 MEAs have more than 20,000 premises.

⁵⁹ In the 2024 WLA/WCA Decision, Q1 2023 was the data point used in examining data geographically.

92. 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 the overall Commercial NG WLA Market, in the period Q1 2023 to Q3 2025 Eircom's market share declined by 10.41 p/p to 73.67% (from 84.09%). Over this same time period SIRO's market share grew by 2.88 p/p to 18.79% (from 15.91%), while Virgin Media's market share grew to 7.54%.

Table 6: Commercial Area MEAs by Size: Market Share Changes Q1 2023 to Q3 2025 FTTC & FTTP

MEA Size Range	Eircom Q1'2023	Eircom Q3'2024	Eircom Q3'2025	SIRO Q1'2023	SIRO Q3'2024	SIRO Q3'2025	VMI Q1'2023	VMI Q3'2024	VMI Q3'2025	Eircom PP Change Q1'2023 to Q3'2025	SIRO PP Change Q1'2023 to Q3'2025	VMI PP Change Q1'2023 to Q3'2025
0 - 1,000	97.95%	97.01%	96.64%	2.05%	2.33%	2.45%	0.00%	0.67%	0.91%	-1.31%	0.40%	0.91%
1,001 - 2,500	95.84%	93.77%	92.87%	4.16%	5.78%	6.35%	0.00%	0.45%	0.78%	-2.96%	2.19%	0.78%
2,501 - 4,000	83.81%	76.21%	71.38%	16.19%	21.36%	24.44%	0.00%	2.43%	4.18%	-12.43%	8.25%	4.18%
4,001 - 5,500	78.57%	72.12%	68.29%	21.43%	23.90%	25.61%	0.00%	3.97%	6.10%	-10.28%	4.18%	6.10%
5,501 - 7,000	76.10%	66.48%	60.40%	23.90%	26.75%	28.34%	0.00%	6.78%	11.26%	-15.70%	4.44%	11.26%
7,001 - 8,500	72.39%	63.75%	59.68%	27.61%	29.68%	30.64%	0.00%	6.56%	9.68%	-12.71%	3.03%	9.68%
8,501 - 10,000	81.04%	73.04%	67.31%	18.96%	19.57%	19.93%	0.00%	7.39%	12.76%	-13.73%	0.97%	12.76%
10,001 - 12,500	71.72%	65.56%	61.43%	28.28%	30.61%	31.15%	0.00%	3.83%	7.41%	-10.29%	2.88%	7.41%
12,501 - 15,000	72.10%	65.37%	60.36%	27.90%	29.21%	29.76%	0.00%	5.42%	9.88%	-11.74%	1.86%	9.88%
15,001 - 17,500	85.67%	76.70%	68.74%	14.33%	16.67%	17.75%	0.00%	6.63%	13.51%	-16.93%	3.42%	13.51%
17,501 - 20,000	83.07%	73.69%	67.93%	16.93%	17.23%	17.64%	0.00%	9.08%	14.42%	-15.13%	0.71%	14.42%
> 20,001	89.46%	78.13%	63.31%	10.54%	11.49%	11.23%	0.00%	10.37%	25.46%	-26.16%	0.70%	25.46%
Total	84.09%	78.04%	73.67%	15.91%	17.90%	18.79%	0.00%	4.05%	7.54%	-10.41%	2.88%	7.54%

93. Table 7, below, shows the change in shares for FTTP only between 2023 and Q3 2025. This shows that overall, Eircom's share in the FTTP portion of the market has declined by 2.88%, Virgin Media's market share has increased by 10.14%, while SIRO's has declined by 7.26%.

Table 7: Commercial Area MEAs by Size: Market Share Changes Q1 2023 to Q3 2025 FTTP

MEA Size	Eircom Q1'2023	Eircom Q3'2024	Eircom Q3'2025	SIRO Q1'2023	SIRO Q3'2024	SIRO Q3'2025	VMI Q1'2023	VMI Q3'2024	VMI Q3'2025	Eircom PP Change Q1'2023 to Q3'2025	SIRO PP Change Q1'2023 to Q3'2025	VMI PP Change Q1'2023 to Q3'2025
0 - 1,000	96.62%	95.67%	95.63%	3.38%	3.37%	3.19%	0.00%	0.97%	1.18%	-0.99%	-0.19%	1.18%
1,001 - 2,500	91.74%	90.88%	90.80%	8.26%	8.46%	8.20%	0.00%	0.66%	1.00%	-0.94%	-0.06%	1.00%
2,501 - 4,000	64.33%	64.36%	62.57%	35.67%	32.01%	31.96%	0.00%	3.64%	5.47%	-1.76%	-3.71%	5.47%
4,001 - 5,500	53.66%	59.12%	58.44%	46.34%	35.05%	33.57%	0.00%	5.83%	7.99%	4.78%	-12.78%	7.99%
5,501 - 7,000	52.89%	51.15%	48.33%	47.11%	38.97%	36.98%	0.00%	9.88%	14.69%	-4.56%	-10.13%	14.69%
7,001 - 8,500	50.51%	50.16%	49.05%	49.49%	40.82%	38.72%	0.00%	9.02%	12.23%	-1.46%	-10.77%	12.23%
8,501 - 10,000	55.47%	58.57%	55.29%	44.53%	30.07%	27.26%	0.00%	11.36%	17.45%	-0.18%	-17.27%	17.45%
10,001 - 12,500	37.45%	43.00%	43.68%	62.55%	50.66%	45.50%	0.00%	6.34%	10.83%	6.23%	-17.06%	10.83%
12,501 - 15,000	45.27%	49.43%	47.90%	54.73%	42.66%	39.11%	0.00%	7.91%	12.99%	2.63%	-15.62%	12.99%
15,001 - 17,500	48.59%	53.56%	49.56%	51.41%	33.22%	28.65%	0.00%	13.22%	21.80%	0.97%	-22.77%	21.80%
17,501 - 20,000	54.51%	55.40%	53.04%	45.49%	29.20%	25.84%	0.00%	15.40%	21.12%	-1.48%	-19.64%	21.12%
> 20,001	68.34%	58.30%	44.53%	31.66%	21.92%	16.98%	0.00%	19.79%	38.49%	-23.81%	-14.68%	38.49%
Total	67.44%	66.56%	64.56%	32.56%	27.27%	25.29%	0.00%	6.17%	10.14%	-2.88%	-7.26%	10.14%

4.2.4 NG WLA Market - Geographic Assessment Criteria

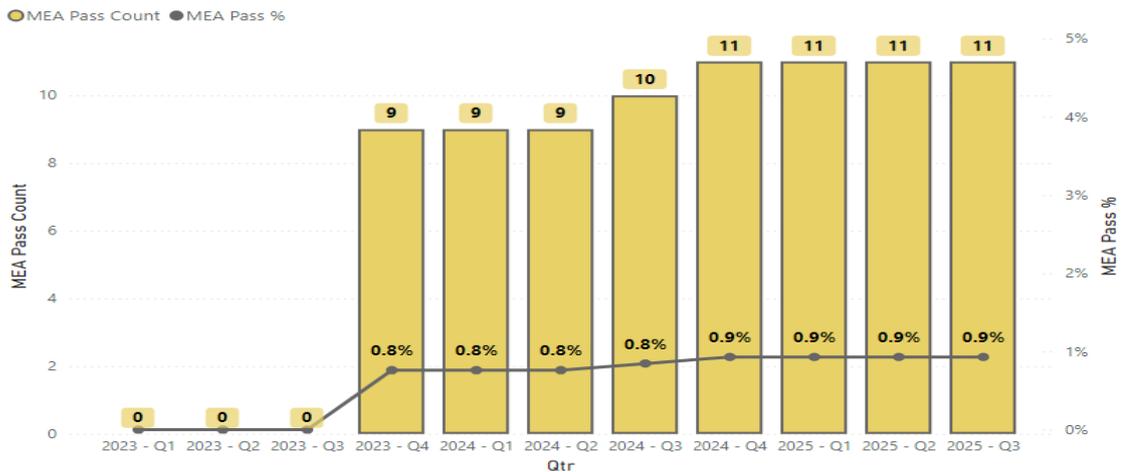
94. In the 2024 WLA/WCA Decision⁶⁰ ComReg set out three cumulative criteria to ascertain the conditions of competition at the MEA level. In summary, the cumulative criteria were as follows⁶¹:
- (a) **Criterion 1:** At least three Networks in a MEA are capable of delivering VUA (SIRO, Eircom and VMI) must be present, or reasonably forecast to be present at the Modified EA;
 - (b) **Criterion 2:** Individual Network 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 Networks.
95. Below ComReg has reapplied these criteria using NOs' coverage data as at Q3 2025. In reapplying the criteria, Figure 21 below shows as at Q3 2025 there has been a small increase in the number of MEAs meeting the criteria cumulatively, with 11 MEAs doing so (representing 0.9% of all MEAs in the Commercial NG WLA Market). No MEAs met the criteria in the 2024 WLA/WCA Decision.⁶²
96. Virgin Media did not commence offering NG WLA services at the wholesale level until Q3 2023 with the introduction of its XGS PON network and that it also had active FTTP retail lines on its historical RFOG network footprint.

⁶⁰ See Annex 12 of the 2024 WLA/WCA Decision for more details.

⁶¹ See paragraph 5.383 of the 2024 WLA/WCA Decision.

⁶² When Virgin Media's cable network coverage is hypothetically included, whereby Virgin Media's cable footprint is considered to be completely upgraded to FTTP and so hypothetically part of the Commercial NG WLA Market, the number of MEAs is 28, covering 180,247 premises. As stated in the 2024 WLA/WCA Decision, in Q1 2023, this number was 18 MEAs and 100,612 premises. See Figure 33 in Annex 1 for more details.

Figure 21: Cumulative MEAs passing the Geographic Analysis Criteria in the Commercial NG WLA Market⁶³



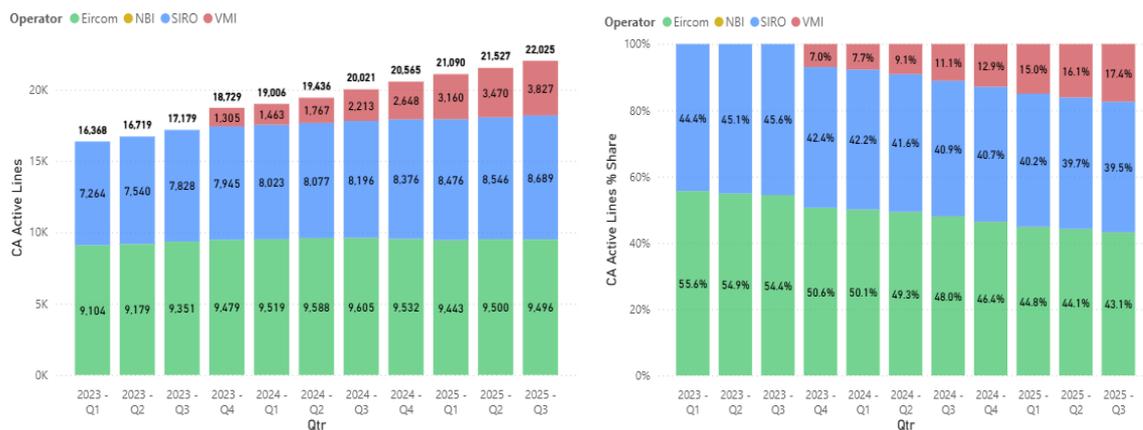
97. Table 8 below sets out the 11 MEAs that meet the cumulative criteria as of Q3 2025. Looking at these 11 MEAs, they are all in the suburbs of towns or cities across the country. These are a mix of small, medium and one large-sized MEAs with the number of premises in each MEA ranging from 284 to 15,532 premises, with there being 35,355 premises overall (equivalent to 1.79% of all premises in the Commercial NG WLA Market). The total number of active NG WLA lines in these 11 MEAs as at Q3 2025 was 22,025, up from 17,372 lines in Q1 2023 (and is equivalent to 2.02% of all NG WLA active lines in the Commercial NG WLA Market).
98. In terms of coverage, on average, Eircom has covers 72.6% of premises with FTTP. The FTTP networks of Virgin Media and SIRO each covered 75.4% and 81.8% of these premises, respectively. Furthermore, 61.8% of the premises in these 11 MEAs have access to three NOs' providing NG WLA services.

⁶³ Please note that in the Wholesale Monitoring Report – Issue 1 ComReg included MEAs for the period Q1 2023 to Q3 2023 where Virgin Media's FTTP network was available but it had not yet commenced offering wholesale services. This indicated 2 MEAs as meeting the Criteria. However, as this FTTP network was not made available for NG WLA services until Q4 2023, they have been properly omitted from this Issue 2 Report

Table 8: MEAs that meet the Cumulative Criteria, Q3 2025

EA Code	Name	CA Premises
MVW	MERVUE	15,532
PAN	PORTARLINGTON	4,540
BNN	BALLYMONEEN	4,530
BFF	BALGRIFFIN	3,345
TLT	TYRELLSTOWN	2,987
GNO	GREENOGUE	1,221
ARW	ARDREW	1,168
ROM	ROSCAM	673
MBT	MONEYBALLYTYRRELL	635
KIH	KILCOHAN	440
WPK	WHITEPARK	284
Total		35,355

Figure 22: Commercial NG WLA Market: Active Lines and Market Shares for 11 MEAs Meeting the Geographic Criteria – Q1 2023 to Q3 2025

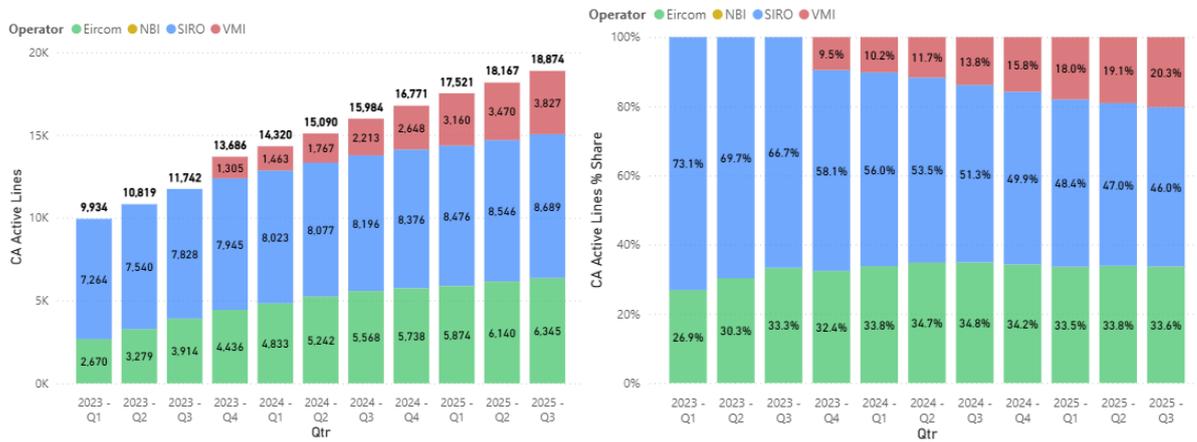


99. As set out in the Market Monitoring Report – Issue 1 there were 10 MEAs that met the criteria in Q3 2024, and using the Q3 2025 data there are two additional MEAs: Mervue and Portarlington (containing 15,532 and 4,540 premises, respectively), while one MEA was removed, Collins Lane (containing 837 premises).⁶⁴ As such, comparisons with the aggregate metrics for those 10 are not completely comparable to these 11.

⁶⁴ The number of premises in Collins Lane increased from 785 to 837 with no increase in coverage meaning the 3 network coverage criterion fell below 60% meaning the 2nd criterion is no longer fulfilled.

100. Figure 22 above also shows the market shares in the 11 MEAs meeting the geographic assessment criteria above, as at Q3 2025. Looking at FTTC and FTTP NG WLA across these MEAs collectively, it shows that Eircom’s share of active lines in these 11 MEAs has declined from 52.41% to 43.11% between Q1 2023 and Q3 2025. SIRO has seen a decline in its share from 41.81% to 39.45%, while Virgin Media’s market share is at 17.38%.
101. Figure 23 below shows that the total number of active NG FTTP WLA lines in these 11 MEAs as at Q3 2025 was 18,874 lines, up from 9,934 FTTP lines in Q1 2023 (equivalent to 2.1% of all active FTTP lines in the Commercial NG WLA Market, in Q3 2025). Over this period, it shows that Eircom’s share of active FTTP lines has increased from 26.88 to 33.62% (up 9.2 p/p). Over the same period SIRO has seen a decline in its market share from 73.12% to 46.04% (down 20.37 p/p), with Virgin Media’s market share is at 20.28%.

Figure 23: FTTP Active Lines and FTTP Shares for the 11 MEAs Meeting the Geographic Criteria – Q1 2023 to Q3 2025⁶⁵



4.2.5 Overall Conclusions on NG WLA Market - Geographic Assessment Criteria

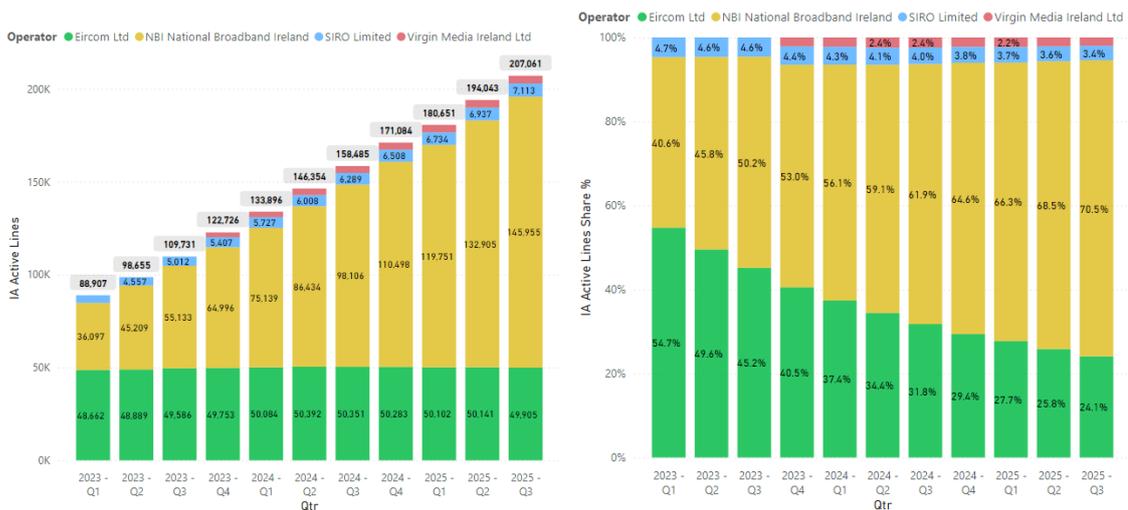
102. Having regard to the above, the 11 MEAs now meeting the cumulative criteria for the geographic assessment the associated premises (35,355) represent 1.79% of all premises in the Commercial NG WLA Market as of Q3 2025. This confirms that the conclusions of the 2024 WLA Decision remain valid.

⁶⁵ Note that NBI data not shown as it has a small FTTP network presence and number of active FTTP lines in the Commercial NG WLA Market.

4.3 IA NG WLA Market

103. As set out in section 2.1 above, the NG WLA IA market was effectively defined as encompassing all premises in an MEA falling within the NBP IA as delimited in the 2024 WLA/WCA Decision (a static IA). 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.
104. As set out in Figure 1 and Table 2 above NBI have, as of Q3 2025, passed 419,869 premises, reaching approximately 74% of their roll-out target which is scheduled for completion in 2027.
105. Figure 24 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.⁶⁶

Figure 24: NG WLA Market Active Lines and Market Shares in the IA NG WLA Market



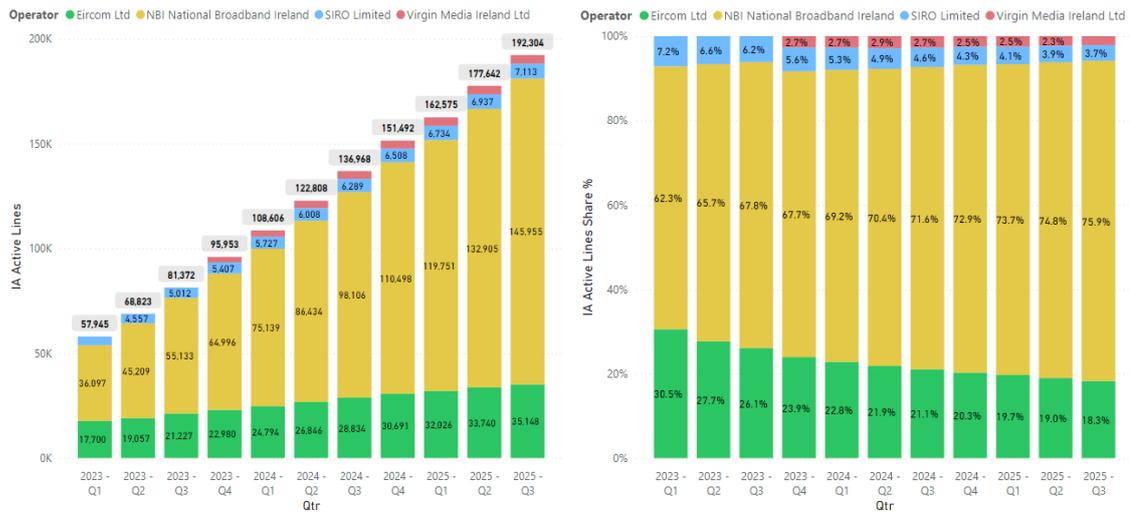
106. Of the 207,061 active NG FTTC and FTTP lines in the IA, as of Q3 2025 145,955 of them were provided on NBI's network, giving it a 70.5% market share (+29.9 p/p since Q1 2023) in the IA NG WLA Market. Having regard to this trend and as NBI's FTTP roll-out continues, NBI's market share growth is expected to continue further, with corresponding declines in other NOs' market shares.

⁶⁶ As set out in paragraph 5857 above, the IA NG WLA Market is defined with reference to the 486,720 premises that were identified as falling within the NBP IA at the end of Q1 2023.

107. 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).
108. 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 completion⁶⁷.
109. As of Q3 2025 Eircom had 49,905 active NG WLA lines in the IA NG WLA Market-up from 48,662 in Q1 2023, but decreasing since Q2 2024 when it was 50,392. SIRO have 7,133 active NG WLA lines, an increase of 2,965 since Q1 2023, with Virgin Media having 4,088 active NG WLA lines, up from 2,570 in Q4 2023, when it commenced selling active lines to other operators.
110. Looking at FTTP in particular, Figure 25 below shows the number of active FTTP lines over time and corresponding market shares. Overall, the number of active FTTP lines in the IA NG WLA Market has grown from 57,945 to 192,304 from Q1 2023 to Q3 2025, an increase of 134,359.

⁶⁷ 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.

Figure 25: FTTP Shares in the IA NG WLA Market – Q1 2023 to Q3 2025



111. Looking at individual NOs, NBI’s active FTTP lines has grown from 36,097 in Q1 2023 to 145,955 in Q3 2025, an increase of 109,858, with its share of FTTP services growing from 62.3% to 75.9% over this period.
112. Over this same period, the number of Eircom active FTTP lines has grown from 17,700 to 35,148, an increase of 17,448 with its corresponding share of the FTTP space decreasing from 30.5% to 18.3%. SIRO’s market share fell from 7.2% to 3.7%. Finally, Virgin Media’s share of FTTP lines fell slightly from 2.7% in Q4 2023 to 2.1% in Q3 2025.
113. 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 terms of other Nos, it is likely that as NO roll-out their DTFP network to premises in the Commercial NG WLA Market, they will be close to premises within the IA NG WLA Market and they choose to serve some such premises.
114. 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 26 below shows the change in the number of active CG lines in the footprint of the IA NG WLA Market since Q1 2023.⁶⁸ 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 2025, approximately 71.5% 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. 28.5% of CG lines cannot be checked).⁶⁹ As such, the data below likely underrepresents the position.

Figure 26: CG Active Lines in the footprint of the IA NG WLA Market



116. As can be seen from Figure 26 the number of known active CG lines in the footprint of the IA NG WLA Market has declined from 30,115 in Q1 2023 to 12,175 in Q3 2025, a drop of 59.6%, 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. Table 9 below sets out changes in FTTP coverage in the IA NG WLA Market in the period Q1 2023 to Q3 2025. As noted in paragraph 58, 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.

⁶⁸ See Section 55 below for more details on the CG WLA Market.

⁶⁹ This was 66.7% in Q1 2023.

Table 9: FTTP Coverage in the IA NG WLA Market⁷⁰

Qtr	NBI IA FTTP Coverage	Eircom IA FTTP Coverage	SIRO IA FTTP Coverage	Virgin IA FTTP Coverage
2023 - Q1	23.30%	9.42%	2.35%	0.70%
2023 - Q2	27.46%	10.22%	2.67%	0.86%
2023 - Q3	32.45%	11.54%	2.99%	1.01%
2023 - Q4	36.46%	12.53%	3.22%	1.56%
2024 - Q1	41.05%	13.74%	3.47%	1.75%
2024 - Q2	47.01%	15.19%	3.67%	2.05%
2024 - Q3	52.82%	16.36%	4.06%	2.07%
2024 - Q4	57.27%	17.55%	4.26%	2.11%
2025 - Q1	61.58%	18.21%	4.35%	2.19%
2025 - Q2	67.60%	18.81%	4.54%	2.21%
2025 - Q3	73.12%	19.49%	4.73%	2.24%

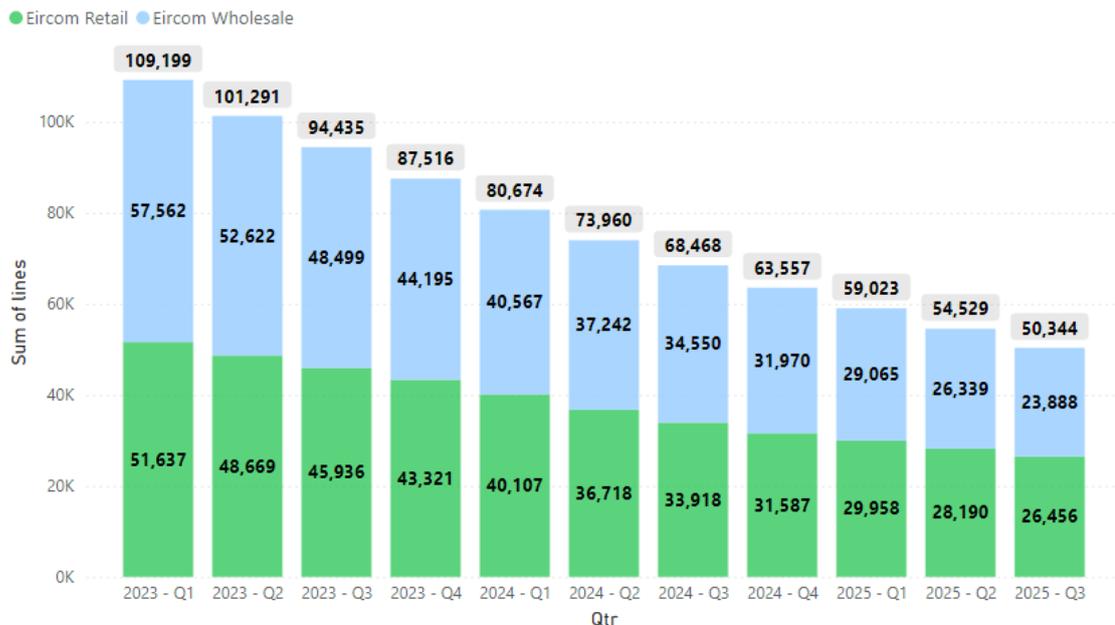
118. In the period Q1 2023 to Q3 2025 NBI's FTTP coverage increased to 73.1% (up 49.8 p/p), Eircom's FTTP coverage increased to 19.5% (up 10.1 p/p), SIRO's FTTP coverage increased to 4.7% (up 2.4 p/p), while Virgin Media's FTTP coverage increased to 2.2%.
119. Having regard to the above, the trends and 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.

⁷⁰ Between Q1 2023 and Q3 2025 there were 14,131 premises added to the IA and over the same period 14,584 premises were removed from the IA. The latter may somewhat explain the growth in Eircom, SIRO & Virgin Media coverage in the IA as defined by the 486,720 premises included at the end of Q1 2023.

5 CG WLA Trends

120. As noted in section 2.1, 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 decline⁷¹.
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 26 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 12,175 in Q3 2025 a drop of 59.6%.
122. As shown in Figure 27 below, the number of active CG WLA lines on the Eircom network overall has continued to decline.

Figure 27: Active CG WLA Lines



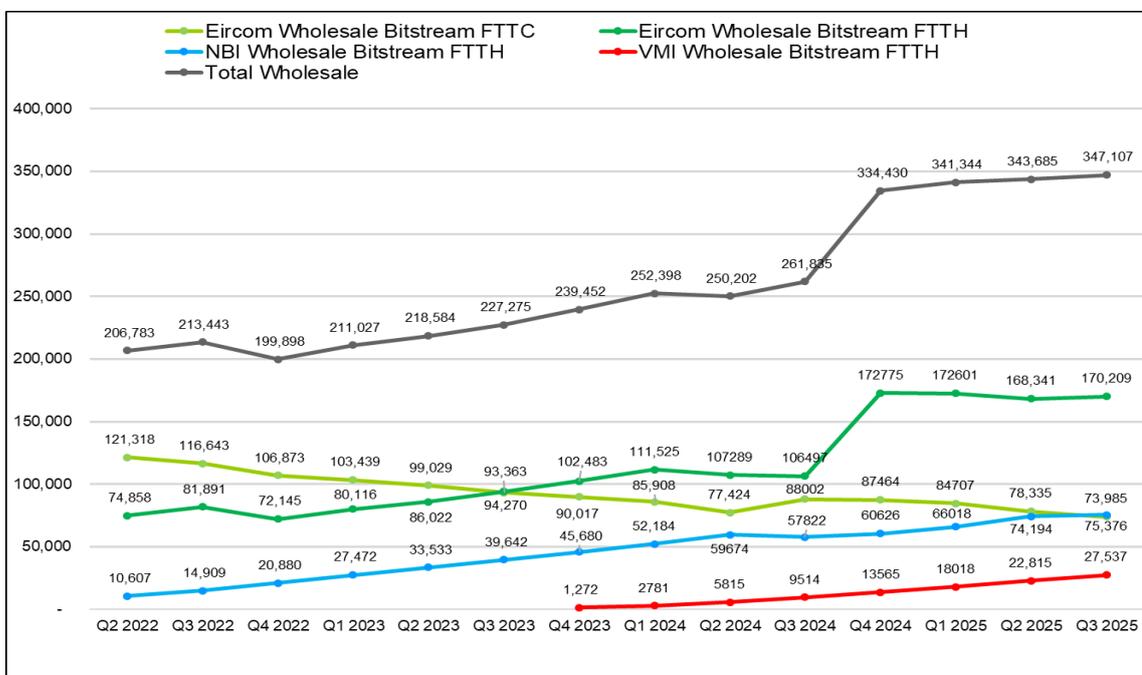
123. In this respect, in Q2 2023, there were 101,291 CG WLA lines active on Eircom's network, 51.95% of which were sold at the wholesale level to other SPs and 48.05% used by Eircom for its own retail arm. By Q3 2025, the total CG WLA lines sold had reduced to 50,344 (a decline of 53.9%) with a roughly 50/50 split between wholesale and retail being maintained (47.4% wholesale and 52.6% 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.

⁷¹ See section 6.7.3 of the 2024 WLA/WCA Decision.

6 WCA Trends

125. As noted in section 2.1, 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 regulation⁷²).
126. Figure 28 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 provides WCA in the NBP IA. Furthermore, Virgin Media only began selling WCA services on its FTTP network in Q4 2023.⁷³

Figure 28: WCA Merchant Market Sales – Q2 2022 to Q3 2025



127. Over the period Q2 2023 to Q3 2025, at a national level, Eircom’s merchant market sales of WCA over FTTC have fallen from 99,029 lines to 73,985 lines, while its FTTP WCA sales to other SPs has grown from 86,022 lines to 170,209 lines over the same period. This gives rise to a total net increase for Eircom of 59,143 WCA lines (185,051 to 244,194), an increase of 32%.

⁷² See Section 7.5 and 7.6. of the 2024 WLA/WCA Decision for more details.

⁷³ Excluding retail self-supply.

128. Over the same period, NBI has increased its WCA merchant market sales from 33,533 lines to 75,376 lines, an increase of 41,843 lines. Finally, VMI started selling merchant market WCA on its FTTP network in Q4 2023 where it sold 1,272 lines, with this having increased to 27,537 lines in Q3 2025.⁷⁴
129. Considering overall WCA merchant market sales across all Network Operators, this showed an increase from 218,584 active lines in Q2 2023 to 347,107 lines in Q3 2025, an increase of 128,523 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. However, the biggest change is in the Eircom figures for both FTTC and FTTP in Q4 2024. This is likely to be a function of Sky customers, who were previously receiving services through BT Ireland's WLA service, now receiving a bitstream service from Eircom.
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.

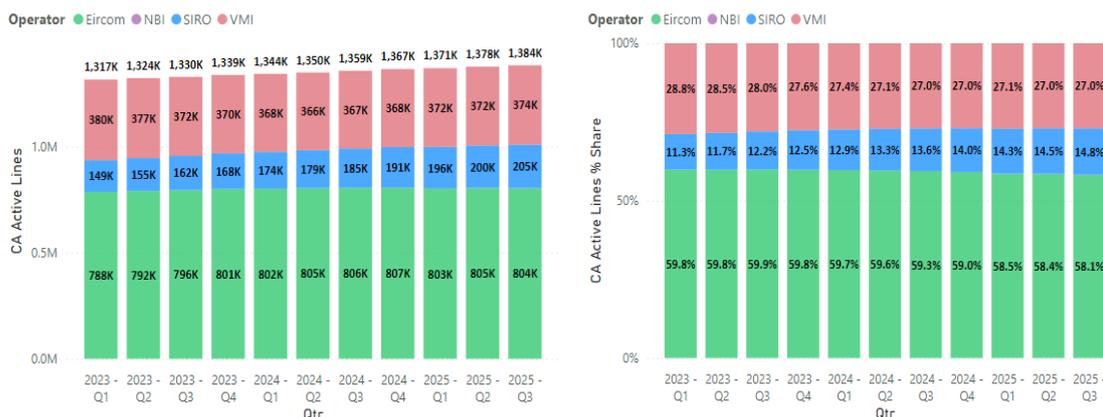
⁷⁴ Please note that 1,088 of Virgin Media's lines are in the IA. This means that the total number of lines is different from that in Figure 16 above where the numbers relate to the Commercial NG WLA Market only.

Annex: 1 Hypothetical Analysis

Treating Virgin Media’s Cable network as FTTP

- A 1.1 In the 2024 WLA/WCA Decision, ComReg undertook a hypothetical exercise to ascertain the impact on the Commercial NG WLA Market if Virgin Media had, at the time of that decision, completed its upgrade of its cable network to FTTP.⁷⁵ The effect of this was to treat Virgin Media’s cable network footprint as if it were its FTTP footprint, also noting that cable broadband does not fall within the scope of the NG WLA markets as defined in the 2024 WLA/WCA Decision. Specifically, arising from this hypothetical analysis it found that 18 MEAs would hypothetically meet the cumulative geographic criteria .⁷⁶
- A 1.2 This annex updates that hypothetical assessment on the Commercial NG WLA Market. Firstly, we treat Virgin Media’s active cable broadband customers as if they were FTTP customers. Secondly, we treat Virgin Media’s cable network footprint as if it were its FTTP footprint (noting that it plans to upgrade its entire network to FTTP with progress on this already outlined in Section 2.3 above).
- A 1.3 In essence, this hypothetical analysis assumes that Virgin Media’s upgrade of its FTTP network is complete and that all its current active cable broadband customers were to become active FTTP customers.⁷⁷

Figure 29: Hypothetical Commercial NG WLA Market including Cable – Network Operator Active lines and Market Shares



⁷⁵ See Annex 12 of the 2024 WLA/WCA Decision, paragraphs A12.74 to A12.80. See also section 4.2.4 of this Issue 2 report.

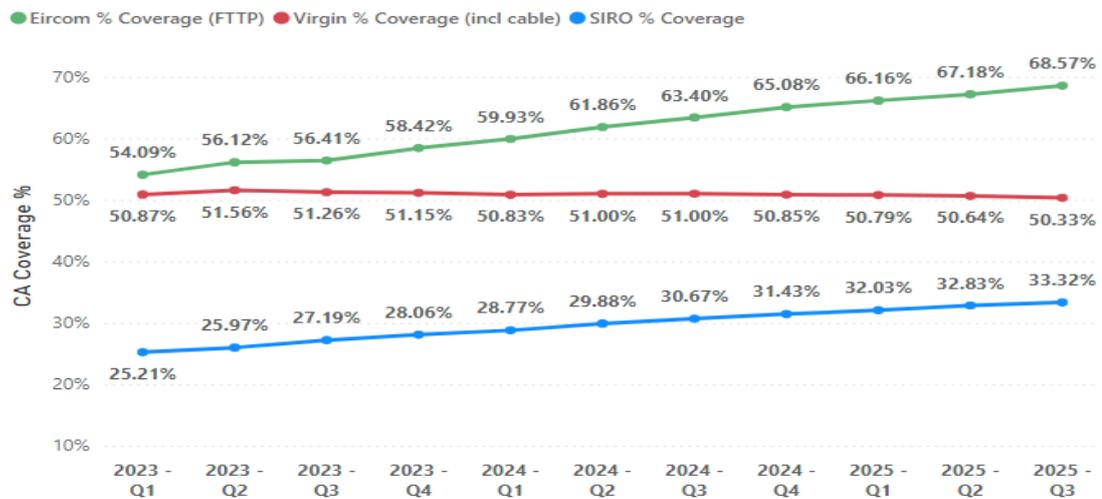
⁷⁶ See Table A12.17 of the 2024 WLA/WCA Decision for details.

⁷⁷ See Section 2.3 above for more details.

A 1.4 Figure 29, above, shows the combined total of active customers who had either NG WLA and/or cable broadband in the Commercial NG WLA Market from Q1 2023 to Q3 2025. In this scenario the total number of customers grew from 1.317 million in Q1 2023 to 1.384 million in Q3 2025, an increase of 67K customers, or a growth of 5.1% over the period.

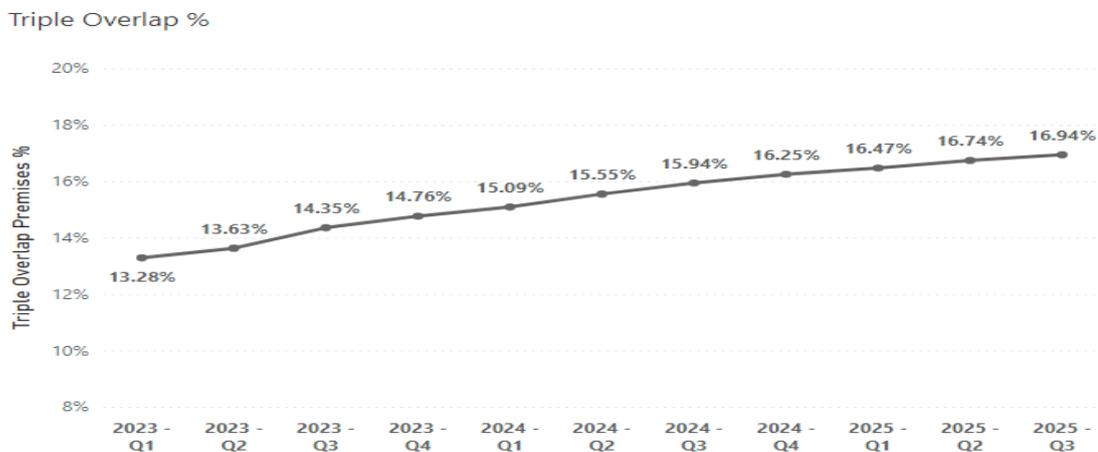
A 1.5 Over this period, Eircom’s and Virgin Media’s market shares decline by 1.7% and 1.8%, respectively. SIRO market share grew by 3.5%.

Figure 30: Hypothetical FTTP Network Coverage in the Commercial NG WLA Market (assuming Cable network upgraded to FTTP) – Q1 2023 to Q3 2025



A 1.6 Figure 30, above, is a variation of Figure 19, but treating Virgin Media’s cable network footprint as if it were fully upgraded to FTTP. In this scenario, Virgin Media’s hypothetical FTTP coverage would be stable at 50% over the period Q1 2023 to Q3 2025.

Figure 31: Hypothetical Share of Premises Passed by 3 networks in the Commercial NG WLA Market (assuming Cable network upgraded to FTTP) – Q1 2023 to Q3 2025



A 1.7 Figure 31, above, is a variation of Figure 18, but considers the impact of the hypothetical treatment of Virgin Media’s cable network footprint as if it were upgraded to FTTP. In this scenario the number premises with 3 available networks available grows from 13.28% of premises in Q1 2023 to 16.94% of premises in Q3 2025.

Figure 32: Hypothetical Commercial NG WLA Market (assuming Cable network upgraded to FTTP) - Network Overlaps Q1 2023 to Q3 2025

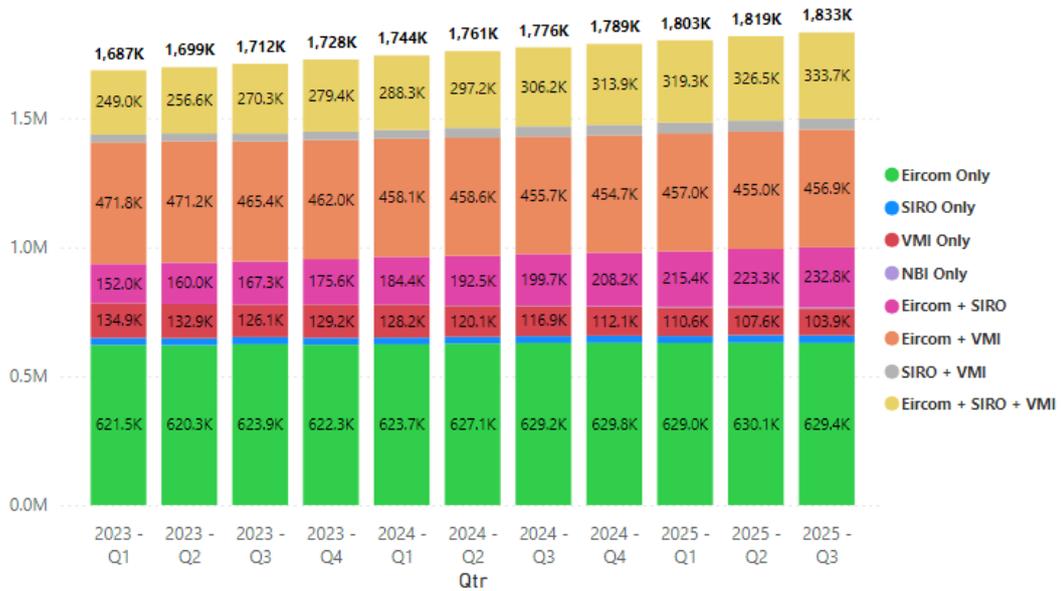
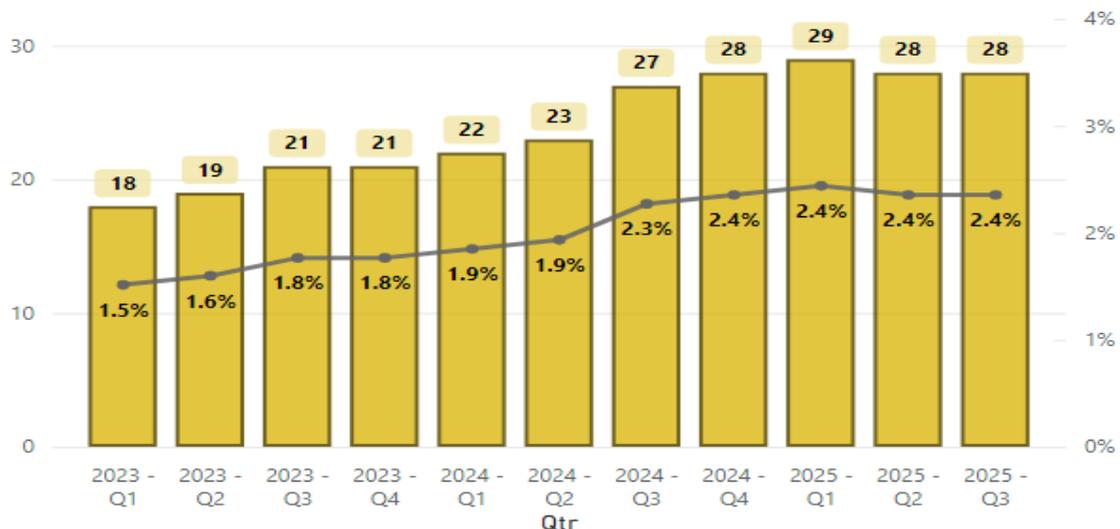


Table 10 Hypothetical Commercial NG WLA Market (assuming Cable network upgraded to FTTP) - Network Overlaps Q1 2023 to Q3 2025⁷⁸

Qtr	Eircom Only	SIRO Only	VMI Only	NBI Only	Eircom + SIRO	Eircom + VMI	SIRO + VMI	Eircom + SIRO + VMI	Eircom + NBI	SIRO + NBI	VMI + NBI	Eircom + SIRO + NBI	Eircom + VMI + NBI	SIRO + VMI + NBI	Eircom + SIRO + VMI + NBI
2025 - Q3	629,448	29,078	103,852	4,875	232,820	456,905	42,627	333,689	726	24	0	21	8	0	9
2025 - Q2	630,135	29,180	107,634	3,448	223,349	454,972	43,371	326,470	496	19	0	20	1	0	0
2025 - Q1	629,021	27,195	110,587	2,819	215,375	456,991	41,673	319,339	393	19	0	20	1	0	0
2024 - Q4	629,845	27,538	112,132	1,990	208,178	454,684	40,528	313,939	259	22	0	12	1	0	0
2024 - Q3	629,245	26,675	116,936	1,617	199,695	455,664	39,639	306,246	231	11	0	11	1	0	0
2024 - Q2	627,068	26,078	120,076	1,235	192,529	458,592	38,272	297,150	161	9	0	4	1	0	0
2024 - Q1	623,741	26,234	128,224	745	184,387	458,112	34,127	288,338	87	2	0	2	1	0	0
2023 - Q4	622,286	26,733	129,217	240	175,592	461,994	32,872	279,359	45	0	0	1	1	0	0
2023 - Q3	623,936	28,016	126,137	38	167,341	465,370	30,991	270,301	1	0	0	0	0	0	0
2023 - Q2	620,317	27,283	132,899	0	159,975	471,210	30,405	256,587	0	0	0	0	0	0	0
2023 - Q1	621,542	27,208	134,911	0	152,011	471,797	30,140	249,005	0	0	0	0	0	0	0

A 1.8 In Q3 2025, the hypothetical number of premises in the Commercial NG WLA Market with different combinations of overlapping NG WLA networks, relative to those Figure 17 above (where cable is excluded) change to those set out in Figure 32, when cable networks are also included. Eircom and Virgin Media overlaps would become the largest set of overlaps, rising from 720,802 in Q1 2023 to 790,594 in Q3 2025. The number of premises passed by three networks would increase from 249,005 in Q1 2023 to 333,689 in Q3 2025.⁷⁹

Figure 33: Cumulative MEAs hypothetically passing the Cumulative Geographic Assessment Criteria in the Commercial NG WLA Market (assuming Cable network is upgraded to FTTP)



⁷⁸ Please note that this Table erroneously detailed the Network Overlaps in the Intervention Area – not the Commercial NG WLA Market - in a previous version of this Report. This has now been amended.

⁷⁹ Please note that Crossan have passed 4, 612 premises with their cable network.

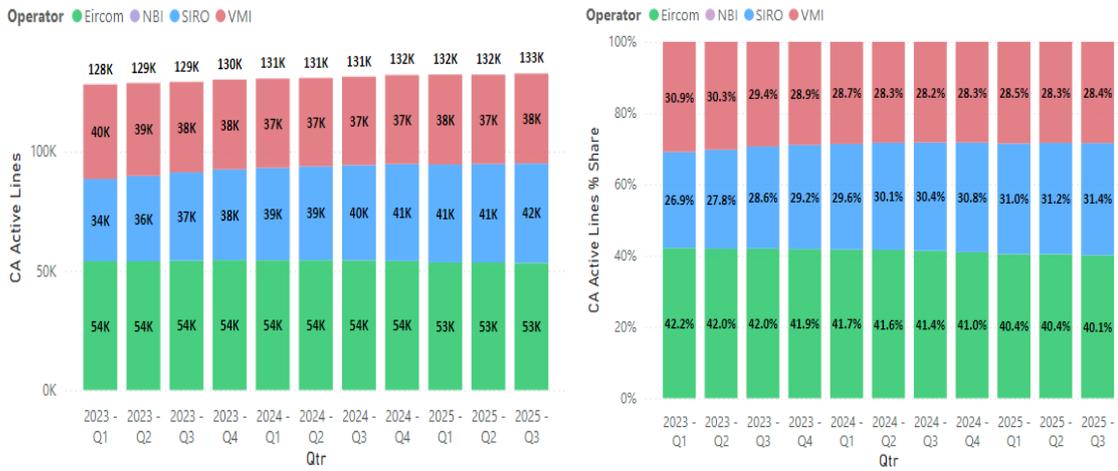
A 1.9 As illustrated in Figure 33, with the hypothetical treatment of Virgin Media’s cable network as FTTP it results in the number of MEAs passing the geographic assessment criteria (discussed in Section 4.2.3) over the 11 quarters examined in this report rising from 18 to 28 MEAs over the period Q1 2023 to Q3 2025 (whereas in Figure 21 when cable is not considered to be FTTP it rose from zero MEAs to 11 MEAs over the same period).

Table 11: MEAs that hypothetically meet the Cumulative Geographic Assessment Criteria (assuming Cable network is upgraded to FTTP) , Q3 2025

EA Code	Name	Premises
FNG	FINGLAS	20,200
MVW	MERVUE	15,532
CHF	CHURCHFIELD	14,818
LMK	LIMERICK	14,445
SLA	SHANTALLA	13,852
CRW	CARLOW	13,652
NAS	NAAS	11,755
CHD	CAHERDAVIN	11,214
LKD	DOORADOYLE	10,301
PGS	PORTLAOISE	8,322
TLM	TULLAMORE	7,385
AKW	ARKLOW	5,841
PAN	PORTARLINGTON	4,540
BNN	BALLYMONEEN	4,530
ATY	ATHY	4,095
ATD	ATHLUNKARD	4,057
BFF	BALGRIFFIN	3,345
KLM	KILMINCHY	3,143
TLT	TYRRELLSTOWN	2,987
GNO	GREENOGUE	1,221
ARW	ARDREW	1,168
CSA	COLLINS LANE	837
ROM	ROSCAM	673
MBT	MONEYBALLYTYRRELL	635
MDV	MEADOWVALE	578
KIH	KILCOHAN	440
ADP	ADAMSTOWN THE PADDOCK	397
WPK	WHITEPARK	284
Total		180,247

A 1.10 Table 11 shows the list of individual 28 MEAs as at Q3 2025 that hypothetically pass the geographic assessment criteria where cable is treated as FTTP. Apart from the increase of MEAs from 11 to 28, the total number of premises within these MEAs increases from 35,355 to 180,247 (representing 9.1% of all premises in the Commercial NG WLA Market).

Figure 34: Hypothetical NG WLA Active Lines and Market Shares assuming Cable is FTTP for 28 MEAs Meeting the Cumulative Geographic Assessment Criteria – Q1 2023 to Q3 2025



A 1.11 As shown in Figure 34, the hypothetical number of active lines within these 28 MEAs increases from 128K to 133K.⁸⁰ In this hypothetical scenario, Eircom’s market share declines by 2.1 p/p, from 42.2% to 40.1%, over 11 quarters. Over the same period, Virgin Media’s hypothetical market share falls by 2.5 p/p, from 30.9% to 28.4%. SIRO on the other hand sees its hypothetical market share rise by 4.5 p/p, from 26.9% to 31.4%.

⁸⁰ See Figure 23 above for the number of premises when Cable is excluded.