

alto

alternative operators in the communications market

Consultation on Universal Service Performance Targets

Reference: Submission re ComReg 07/55

September 2007

ALTO appreciated the opportunity to respond to the Consultation on targets for Universal Service Performance targets.

While providing the range of service products is important to the market, what is equally important is the provision of the services and timely repair when faults arise.

There is currently very significant difficulty securing quality of services in particular in the line repair area and ALTO supports efforts by ComReg to address this issue by means of establishing targets to measure the USP against.

Answers to Questions

Q. 1. Do you agree that the establishment of binding performance is justified?
Please state views

Binding targets are a means of measuring the performance of the USP so that actions can be taken for continued failures to meet these targets.

Q. 2. What are your views on the establishment of different performance targets that could be established for in-situ connection and first time connections?

This is a sensible approach and allows for specific targets to be established where there is already an electronic connection present – making the connection process far easier and quicker to deliver.

Q. 3. What are your views on the values proposed for the performance targets?

The values proposed are reasonable initially, however there should be a second step added after 6 months by the increase of each stage by 5% and setting 99% to be completed by 13 weeks.

Q. 4. What are your views on the proposed targets for fault occurrence?

Fault occurrence is not only related to weather but to the condition of the network. This reflects substantially on the standard of ongoing maintenance and refreshing of deteriorating plant over a period of time. Thus to ensure that there will be an

improvement ComReg should examine these maintenance and upgrade and replacement programmes to ensure they are adequate.

The standards proposed are minimal based on where we are, indicating that more analysis is required to ensure the measures are put in place to improve the network.

Q. 5. What are your views on the proposed targets for repair times?

We welcome the move to calendar rather than working days and accept the targets proposed.

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