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Mr Brendan O' Brien
Commission for Communications Regulation (ComReg)
One Dockland Central,
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Submitted to: marketframeworkconsult@comreg.ie

12 October 2017

Dear Mr. O' Brien

Reference: Consultation 17/70 – Review of Non-Geographic Numbers

The Irish Tax Institute is the leading representative and educational body for tax advisers in Ireland with over 5,000 members. Institute members assist thousands of Irish taxpayers to comply with their tax obligations and play an integral part in the effective administration of the Irish tax regime.

Our members are frequent users of 1890 Non-Geographic Numbers (NGN), as the Revenue Commissioners (Revenue) extensively use the 1890 platform to deliver their telephone service. Many of our members call Revenue's phonelines multiple times a day to deal with their clients' tax affairs. In fact, the 1890 Revenue telephone service is now one of the main communication channels with Revenue for tax advisers (and for taxpayers).

We welcome the opportunity to provide input on our members' perspective of the 1890 service. As such, we are responding to Question 1 in the Consultation Paper - ComReg's proposal to cap the cost of a call to an 1890 number at the equivalent cost of a call to a landline in the same geographic location.

This would also require 1890 calls to be included in “bundled minutes” on the same basis as calls to landlines.

On numerous occasions, members have raised with us the high cost of calling the Revenue 1890 phonelines and the exclusion of these numbers from the packages of “bundled minutes” sold by telecommunications companies. At busy times in the tax year, for example in advance of key deadlines for filing tax returns, the volume of calls to Revenue increases substantially. This in turn exponentially increases the cost of calls for our members, due to the length of time spent on hold waiting to get through to Revenue. At peak times, members can spend up to 30 minutes in the “queue” of callers. The costs can be even higher when ringing from a mobile number. As acknowledged in the Consultation Paper, calls from mobile phones to 1890 numbers can cost up to five-times the cost of a call from a fixed line.

As we understand it, the 1890 platform is the current platform that best delivers an effective telephone service for Revenue, given the large volume of calls received.¹ In 2016, Revenue received nearly 2.7 million phone calls.² In recent years, Revenue has considerably extended its use of 1890 numbers to provide a better quality and more responsive telephone service. The 1890 platform allows Revenue to analyse call volumes and better manage demand to reduce waiting times for callers, with a view to delivering a service consistent with Revenue’s Service Standards. The telephone service is a vital component of Revenue’s service to ensure tax queries are addressed in a timely and cost-effective manner.

The main reason for introducing 1890 numbers 20 years ago was to reduce the cost of telephone calls for consumers. In particular, it was intended that 1890 numbers would ensure that individuals contacting government departments or similar organisations by telephone from anywhere in Ireland would pay no more than the cost of a local call.

¹ Minister for Finance, Public Expenditure and Reform, Paschal Donohoe T.D in response to a Parliamentary Question on 11 September 2017

² Ibid

The Irish landscape has changed considerably since the introduction of the 1890 service, given the emergence of mobile phone services and market competition. However, consumers still need to be able to contact government offices and similar organisations at a reasonable cost and the 1890 service is not delivering on this requirement, due to the high costs of calling these numbers.

For the reasons outlined above, we support ComReg's proposal that the cost of calling an 1890 number should not exceed the equivalent cost of calling a landline in that geographic location and that 1890 numbers should be included in packages of "bundled minutes" on the same basis as other landlines.

Yours sincerely

A handwritten signature in black ink that reads "Martin Lambe".

Martin Lambe

Chief Executive