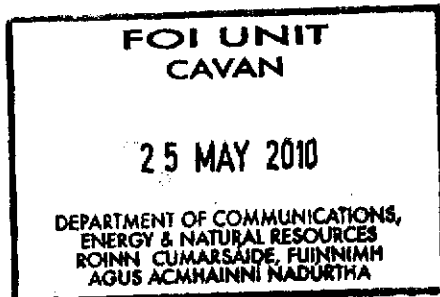


Ms Mary Rabbitte,  
Department of Communications, Energy & Natural Resources,  
FOI Unit,  
Elm House,  
Earlsvale Road,  
Cavan.



21 May 2010

Dear Ms Rabbitte,

Under the Freedom of Information Act, 1997, I wish to apply for copies of notes, emails, letters, minutes of meetings et cetera between any official in the department and any member of Eircom or of the company's current owner, Singapore Technologies Telemedia (STT), dated between 1 June 2009 and the current date and that relate to topics including:

- the planned and actual acquisition of Eircom by STT
- Investment in Eircom's network and general discussion regarding Eircom's infrastructure
- Redundancies at Eircom
- Future plans for Eircom
- STT's intentions in relation to Eircom
- Requests by STT or Eircom to department members for meetings or vice versa.

I enclose the relevant application fee. If you have any queries please do not hesitate to contact me.

Yours sincerely,

John Mulligan  
The Irish Independent

02/06/2010

Mr John Mulligan  
The Irish Independent



**FOI Request Reference: FOI/2010/24**

Dear Mr Mulligan,

I refer to your FOI request under Section 7 of the Freedom of Information Acts, 1997 and 2003, received in this office on 25/05/2010 requesting copies of notes, letters, minutes of meetings et cetera between any official of the Department and any member of Eircom or of the company's current owner, STT, between 1 June 2009 and the current date.. The application was received along with the associated fee.

The officer handling your request will be Mr Philip McMahon, Communications Policy Division, Department of Communications, Energy and Natural Resources, 29-31 Adelaide Road, Dublin 2. Philip can be contacted on 01 6782944

You can expect to receive your decision by the 23/06/2010.

If you have not received a decision by that time, you are automatically entitled to appeal to the Department for a review of the matter. This review proceeds on the legal basis that the initial request is considered to be refused once the specified time for responding to it has expired. A request for a review should be addressed to the undersigned at the address shown.

Please note the Department of Communications, Energy and Natural Resources has a policy of posting a summary of non-personal requests and decisions on the Departments website for reference purposes.

Yours sincerely,

---

Carmel Conaty

FOI Unit  
Department of Communications, Energy and Natural Resources  
Elm House, Earlsvale Rd  
Cavan

Phone: 01 6782902



29 July 2010

Our ref. FOI/22010/24

Mr J Mulligan  


Dear Mr Mulligan,

I refer to the request which you made under the Freedom of Information Acts 1997 and 2003 ("the FOI Act") for records held by this Department including notes, emails, letters, minutes of meetings et cetera between any official of the Department and any member of staff of Eircom or of the company's owner STT dated on or after 1 June 2009.

A final decision to part grant your request has been made on 29 June 2010. If you have any queries regarding this correspondence you can contact me by telephone at 01-6782959

The purpose of this letter is to explain that decision. This explanation has the following parts:

1. a schedule of all of the records covered by your request;
2. concerning records to which access is granted, an explanation and a statement of the arrangements for this access, its form and the fee required to be paid;
3. concerning records to which access is denied, an explanation of the relevant findings; and
4. a statement of how you can appeal this decision should you wish to do so.

#### **1. Schedule of records**

A schedule is attached to this letter. It shows the documents that this Department considers relevant to your request. It also gives you a summary and overview of the decision as a whole. The schedule outlines each document, and indicates whether the document is released in full (grant), released with deletions (part grant) or not released

(no full record has been withheld). The schedule refers to the sections of the FOI Act which apply to prevent release. The schedule also provides brief reasons for the decision which are meant to supplement the fuller explanation given under heading 3. below.

## **2. Access Arrangements**

You have sought access to the records by means of copies and I consider this an appropriate form of access in this case. Accordingly, the records released in full and others released with deletions are now enclosed.

## **3. Findings, particulars and reasons for decisions to deny access.**

The records requested by you are records of, or records relating to Eircom/STT, which are third parties in your request. *Section 29* of the FOI Act, in its effects in this case, sets out consultation procedures the Department must follow before releasing information about Eircom/STT (or any other third party). In the case of information obtained in confidence it was necessary to advise Eircom/STT and to consider their responses. In the case of records which could be deemed to contain commercially sensitive information it was also necessary to advise Eircom/STT and to consider their responses. Thereafter, in the event the Department would propose to release information which Eircom/STT deemed to be confidentially sourced or commercially sensitive it would be necessary to afford Eircom/STT an opportunity to appeal that proposed decision to the Information Commissioner. This circumstance has not arisen in this case.

The schedule attached provides an overview of the records considered for release. The schedule also notifies you that sections of the records have been withheld as evidenced in the copies of the records enclosed. Where information is withheld it is typically on the basis the information is both commercially sensitive (section 27 of the FOI Act refers) and was provided to the Department on a confidential basis (section 26 of the FOI Act refers). The citing of both in the schedule arises because the applicable provisions are in separate sections (26 & 27) of the FOI Act and are subject in each case to the additional conditions set out in each of those sections. The schedule also explains why the public interest provision in both sections 26 and 27 was not activated to override the other provisions in those sections. In addition I can confirm, by way of an additional clarification, that nothing withheld relates to any decision or commitment by the Department to Eircom/STT.

## **4. Rights of appeal**

You may appeal this decision. In the event that you need to make such an appeal, you can do so by writing to the Freedom of Information Unit, Department of Communications, Marine and Natural Resources, Elm House, Earlsvale Rd., Cavan. Your correspondence should include a fee of €75 for processing the appeal. Payment should be made by way of bank draft, money order, postal order or personal cheque made payable to The Department of Communications, Energy and Natural Resources. You should make your appeal within 4 weeks from the date of this notification.

However, the making of a late appeal may be permitted in appropriate circumstances. *A week is defined in the Act to mean 5 consecutive weekdays, excluding Saturdays and public holidays (Sundays are also excluded, as they are not weekdays).* The appeal will involve a complete reconsideration of the matter by a more senior member of the staff of this Department/Body.

Yours sincerely



Eugene Dillon  
Communications Policy Division.

## Schedule of Records: Summary of Decision Making

Record No.	Brief Description & Date of Record	File Ref.	No. of Pages	Relevant facts	Findings/ conclusions (Public Interest Considerations, (If applicable))	Grant/refuse/ part-grant	Basis of Refusal: Section of Act	Record edited/Identify deletions
1	Report of meeting between Minister and his Officials and STT dated 21/9/09	Tel/Op 29	2	STT update on proposed acquisition of Eircom shareholding	<p>Ss26, 27 of the FOI Act.</p> <p>Information withheld is about Eircom/STT or their opinions. There is no statutory duty on Eircom/STT to provide information of the type sought to DCENR. Formal and informal communications between the Department and communications service providers, operating in a competitive market, is necessary for the proper exercise of the Department's functions in the sector.</p> <p>A decision by any telecommunications company operating in Ireland not to volunteer information to DCENR in the future due to an actual or perceived breach of trust could arise from a DCENR decision to release information about or from a commercial undertaking, supplied to DCENR as commercially sensitive or confidential, and an absence of such co-operation could hamper or otherwise impede the development of communications policy and market assessments, contrary to the</p>	Part Grant	Commercially sensitive and/or Confidential from/to Eircom/STT	Markings on record.





**Note of Meeting  
between  
Minister for Communications, Energy and Natural Resources  
and  
Singapore Technologies Telemedia (ST Telemedia)**

**Present:** Minister Eamonn Ryan, TD  
Mr. Adain Dunning, Secretary General  
Mr. Ken Spratt, Principal, Comms Policy Division

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Mr. LEE Theng Kiat, President and CEO, ST Telemedia  
Mr. Stephen MILLER, CFO  
Mr. Anupam GARG, SVP International Business Development

**Venue:** Minister's Office, 29 Adelaide Rd

**Date:** 21 September 2009, 3:45pm

**Key Points**

1. Mr. Lee thanked the Minister for taking the time to meet with him and his colleagues. Mr. Lee advised the Minister that STT were looking forward to their future ownership of eircom. STT have been successful by (i) adopting a non-incumbent mentality; (ii) diligence and innovativeness in competing in local and regional markets; (iii) adopting a long-term strategic view; (iv) drawing on the experience of a highly competent and dedicated core group of STT employees (especially their highly trained, experienced engineers). STT intend to use their wealth of experience as a competitive operator and hope to repeat their success with eircom.
2. Eircom presents "a complex set of issues" that STT believe can be tackled successfully. Tackling the issues will require cooperation.
3. Echoing Mr. Lee's stated need for cooperation, Minister Ryan outlined his strong view regarding the importance of collaboration. He mentioned the need for a variety of collaborative approaches: (i) within industry; (ii) between government and industry; and (iii) between government, industry and the regulator. Minister Ryan referred to the "deal space" into which all parties must go to make real progress and touched on the need for real strategy where parties are prepared to give up something good in order to get something better.
4. The STT representatives agreed. Mr. Lee touched on STT's other projects including the Singaporean Next Gen NBN and their interests in carrier neutral data centres. STT representatives mentioned the helpful role of the ESOT [REDACTED]  
[REDACTED]  
[REDACTED]
5. The issue of DTT was discussed briefly and department's wish to see early analogue switch off was mentioned.

*Commercial*

6. [REDACTED]

7. [REDACTED]

8. Finally they mentioned bundling and implied that bundling would be important to STT's future plans. (Bundling and costly LLU can give rise to significant challenges for Other Authorised Operators.) The Minister acknowledged their point but did not respond.

9. The meeting ended with an invitation to the Minister and his officials to visit STT for further sharing of perspectives and learning.

**ENDS**

Kenneth Spratt

3 emails + attachment

From: Moira McAuliffe  
Sent: 06 October 2009 11:44  
To: Colm Ó Conaill  
Cc: Kenneth Spratt; Peter O'Neill; Aidan Dunning; Susan Lowen  
Subject: Letter to Min Ryan on foot of meeting 21/9 with STT  
Attachments: Letter to Minister of Communications, Energy & Natural Resources - Mr Eamon Ryan. 05 OCT 2009.pdf

19 2

Colm

Please see attached thank you letter for Minister Ryan from STT on foot of there meeting in September.

Regards,

*Moira McAuliffe*  
*Department of Communications, Energy and Natural Resources*  
*29-31 Adelaide Road, Dublin 2*  
*Secretariat Office*  
*Phone: 01- 6782161*  
*Fax: 01-6782079*  
*E:mail: [moira.mcauliffe@dcenr.gov.ie](mailto:moira.mcauliffe@dcenr.gov.ie)*

---

**From:** anupam\_garg@sttelemedia.com [mailto:anupam\_garg@sttelemedia.com]  
**Sent:** 06 October 2009 10:26  
**To:** Moira McAuliffe  
**Cc:** Micheal Smith (DFA)  
**Subject:** Re: Meeting today 3:45pm with Minister Ryan & officials

Dear Moira,

Please find enclosed a thank you letter for Minister Ryan from our President & CEO.  
May I please request you to print a copy for Minister Ryan? Could you please acknowledge receipt.

Thank you.

Best regards,  
Anupam

---

Anupam Garg  
Sr. Vice President, International Business Development  
Singapore Technologies Telemedia Pte Ltd  
Co. Reg. No. 199500279W  
Tel: 65 6723 8724 Fax: 65 6720 7273  
Email: [anupam\\_garg@sttelemedia.com](mailto:anupam_garg@sttelemedia.com)

"Moira McAuliffe" <Moira.McAuliffe@dcenr.gov.ie> 09/21/2009 04:10 PM

To: GARG Anupam/SVP-IBD/ST Telemedia/ST Group@ST Domain  
cc:

Subject: Meeting today 3:45pm with Minister Ryan & officials

201 2

[This e-mail is confidential and may also be privileged. If you are not the intended recipient, please delete it and notify us immediately; you should not copy or use it for any purpose, nor disclose its contents to any other person. Thank you.]

Dear Anupam,

I wish to confirm your meeting today with Minister Ryan in the Department of Communications, Energy and Natural Resources at our offices here 29-31 Adelaide Road, Dublin 2 at 3:45pm.

If you need assistance with directions please do not hesitate to contact me.

Kind Regards,

*Moira McAuliffe*

*Department of Communications, Energy and Natural Resources*

*29-31 Adelaide Road, Dublin 2*

*Secretariat Office*

*Phone: 01- 6782161*

*Fax: 01-6782079*

*E:mail: [moira.mcauliffe@dcenr.gov.ie](mailto:moira.mcauliffe@dcenr.gov.ie)*



Singapore Technologies  
Telemedia

Singapore Technologies  
Telemedia Pte Ltd  
(Regn. No.: 199500279W)  
51 Cuppage Road  
#09-01 StartHub Centre  
Singapore 229469  
Tel.: (65) 6723 8777  
Fax: (65) 6720 7277  
www.sttelemedia.com

32.2

5 October 2009

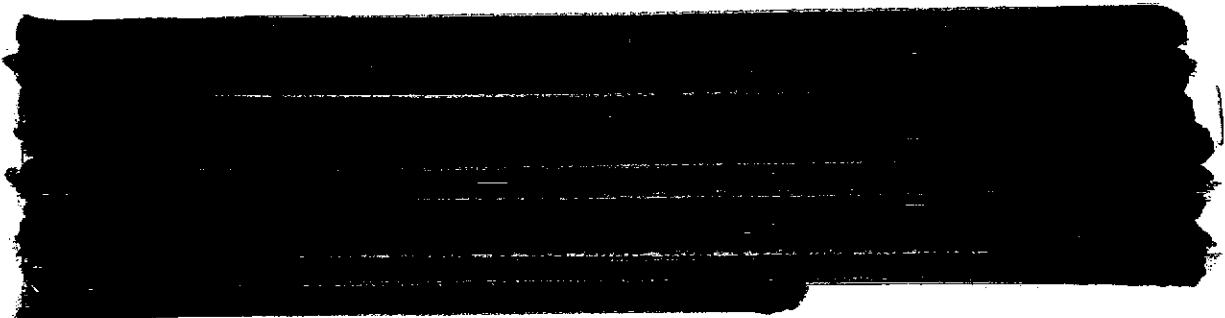
Mr Eamon Ryan  
Minister of Communications, Energy and Natural Resources  
29-31 Adelaide Road  
Dublin 2, Ireland

Dear *Minister Ryan,*

I would like to thank you for finding time to meet us in Dublin. I would like to especially thank you for your insights into the policy priorities of the Department, and the role that the telecommunications sector can play in Ireland's smart economy.

Singapore Technologies Telemedia ("STT") is a strategic investor focused on the telecommunications, media and technology sectors. We are 100% owned by Temasek Holdings, which is an Asian investment house headquartered in Singapore.

We are long term investors and keen to work collaboratively with your department, Comreg and other stakeholders to enhance the telecommunications infrastructure in Ireland. We bring fresh ideas and a constructive approach to the table and are not hampered by historical baggage. I am convinced that our approach, if successful, will enable Eircom to play an important role in building Ireland's smart economy, especially through contributions to the next generation broadband network.



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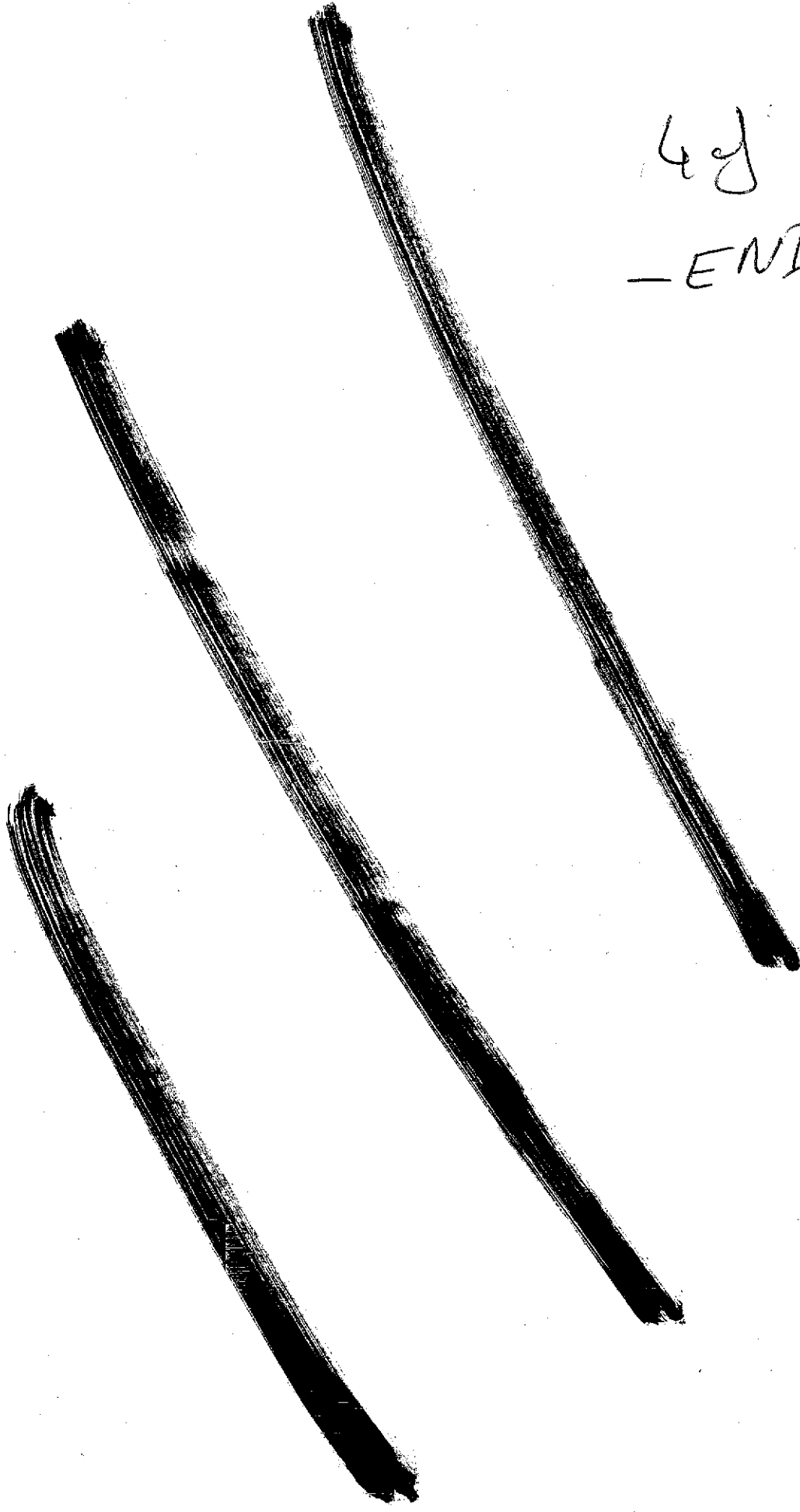
Thank you again for your time. We are grateful for your support for our bid, and look forward to working closely with the Department on specific ideas and proposals.

Yours sincerely,

Lee Theng Kiat

(Attachment: eircom debt profile as of Jun-2009)

eircom debt profile as of Jun 2009



4 of 2  
-END

Note of Meeting  
between  
The Department of Communications, Energy and Natural Resources  
and  
eircom

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Present: Mr. Paul Donovan, CEO, eircom  
Mr. Pat Galvin, Head of Public Policy  
Mr. Aidan Dunning, Secretary General  
Mr. Ken Spratt

Venue: DCENR, Adelaide Rd  
Date: 8 October 2009, 4pm

Key Points

Eircom's current perspective

1. After introductions AD invited PD to share his perspectives on the sector and related matters. PD mentioned the STT deal which he felt would help eircom to "look up and out". STT would take a long term perspective which will be crucial over the next 3-4 years during which time the industry expects to see major transformations. PD is impressed by the STT "calm, considered, no nonsense, business like" approach. He believes eircom has reached a "watershed" juncture caused by various current circumstances including the STT deal, the country's and the industry's need for NGN/A, the recent ComReg decisions, the industry's talk of collaboration, and developments at EU level (State Aid and regulation of NGA).

2. [REDACTED]

3. [REDACTED]

4. PD believes a constructive, holistic approach by ComReg would be a better approach for all. He is prepared to change the company. He would like to: embrace the wholesale market and its opportunities; reduce eircom's wholesale and retail prices; find innovative, open, co-operative models for investment going forward; place Ireland at the heart of eircom strategy for the future by using eircom's scale and ability to deploy scarce capital effectively.

5. [REDACTED]

2013  
1

[REDACTED]

- 6. Nonetheless eircom is pushing ahead with plans for NGN/A deployment and would be happy to share with the Department some financial and business modelling that is currently being undertaken at a cost of almost €2m. The work, which is examining both supply and demand side issues, will be completed in the coming 2 months.
- 7. In terms of "collaboration" PD highlighted the need to "clarify the role of the incumbent", quoting Lord Carter who spoke at the recent TIF conference. PD agrees that meaningful discussions around collaborative NGN/A investment require clarity regarding the role of the incumbent as a pre-requisite.
- 8. PD mentioned that industry's revenue pool of about €4b, EBITDA of about 32%, the estimated cost of €2.5b of driving NGN/A to 65% of the population, no incremental value to the companies for that investment (ARPU in the industry over recent years has remained stubbornly static despite significant increases in industry costs), and the significant public value that would be added by NGN/A.
- 9. PD summed up by stating that eircom want to change for the better, are open for business, are thinking in very different ways and wish to move on positively.

Secretary General's response

- 10. AD touched generally on all of the matters raised. In particular, AD noted PD's market concerns, the legacy issues [REDACTED]  
[REDACTED]  
[REDACTED] AD stressed the independence of ComReg as the national regulatory authority for the electronic communications industry and the competence with which ComReg attends to its responsibilities. He saw merit in adopting a holistic approach as suggested by PD and ventured that ComReg might also be favourable in principle to a dialogue based on this, taking full account of their statutory responsibilities. He observed that DCENR would be willing to play an appropriate role in such a process.

Meeting conclusion

- 11. In response, PD said he would welcome Minister being briefed on the meeting, offered to share the outcome of the soon to be concluded NGN/A analysis, emphasised the importance of the STT deal being finalised, and would welcome any appropriate intervention by the Minister/Department with a view bringing both eircom and ComReg to a more collaborative approach to resolving their current difficulties.

After thoughts

- 12. Eircom are facing strong competition; [REDACTED]  
[REDACTED]

3023

13. They see it as a major positive to have STT as a potential new owner [REDACTED]

[REDACTED]

- END -

14. Eircom appear to be willing to move forward in a spirit of collaboration with ComReg. The Department, whilst welcoming this and perhaps facilitating it as appropriate, needs to be mindful that ComReg has invested considerable time and effort into preparing their recent proposals and decisions which would appear to be well researched and justified.

15.

[REDACTED]

4

**Kenneth Spratt**

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**From:** anupam\_garg@sttelemedia.com  
**Sent:** 28 October 2009 09:34  
**To:** Kenneth Spratt  
**Subject:** Dublin trip

194  
-END-

Dear Kenneth,

Thank you for meeting us in Dublin last week.

We appreciate very much the time and effort the Department has committed to the project. We remain hopeful that the transaction will close in a timely manner, and look forward to working closely with the Department in ensuring that eircom meets the expectations of the community and the various stakeholders.

We look forward to welcoming you to Singapore in the near future.

Thank you again for your time.

Best regards,  
Anupam

5

**Kenneth Spratt**

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**From:** PGalvin@eircom.ie  
**Sent:** 21 January 2010 15:11  
**To:** Peter O'Neill; Kenneth Spratt; Sinéad O'Reilly  
**Subject:** Eircom Board Board Announcement  
**Attachments:** Board Membership Release FINAL.doc; ATT11204402.txt

1/25

Please see Press Release to be issued by eircom this afternoon.

Best Regards,

Pat

<<Board Membership Release FINAL.doc>>

**Pat Galvin**  
**Head of Public Policy**

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eircom Ltd  
6C  
1, Heuston South Quarter  
St. John's Road  
Dublin, 8

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+ 353 85 1744292  
+ 353 1 6004292  
[pgalvin@eircom.ie](mailto:pgalvin@eircom.ie)

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## MEMBERSHIP OF NEW EIRCOM BOARD ANNOUNCED

**Dublin; 21<sup>ST</sup> January, 2010** eircom Limited (eircom) today announced the membership of its board following the acquisition of Australian-based eircom Holdings Limited (ERC) by Singapore Technologies Telemedia (ST Telemedia) and eircom ESOP Trustee Limited (ESOT), which completed on Monday, 4 January 2010.

The directors of eircom are as follows:

### **Mr Ned Sullivan (Independent Chairman)**

Mr Ned Sullivan was appointed as an independent director and Chairman of the Board of eircom on 30 October 2008. He is currently Chairman of Greencore Group plc and McInerney Holdings plc. He is the former Group Managing Director of Glanbia plc and has held various senior management positions in Grand Metropolitan plc in London and Dublin. He holds both BComm and MBS degrees.

### **Mr Jerome Barrett (Deputy Chairman)**

Mr Jerome Barrett has been a director of eircom Limited (and Deputy Chairman of the Board) since 1 June 2009. He was also appointed a director of the ERC Ireland entities on the same date. He has served as Chairman of the eircom ESOP since July 2004 and as a Non-Executive Director of eircom ESOP since August 2001. Mr Barrett served as National Officer of the Communications Workers Union from 1999 until his retirement in June 2009.

### **Mr Tan Guong Ching**

Mr Tan Guong Ching serves as Non-Executive Chairman of ST Telemedia, Asia Mobile Holdings Pte Ltd, StarHub Ltd, Singapore Technologies Aerospace Ltd, Temasek Life Sciences Laboratory Limited and IP Academy. Mr Tan was formerly the CEO of Singapore's Housing and Development Board, the nation's public housing authority. During his career, Mr Tan has initiated several major projects such as the corporatisation of Singapore Telecommunications Ltd, the reorganisation of the former Telecommunications Authority of Singapore, neighbourhood policing, civil defence and commissioning of Singapore's mass rapid transit system.

### **Mr Lee Theng Kiat**

Mr Lee Theng Kiat is President and Chief Executive Officer and Executive Director of ST Telemedia. He spearheaded the formation of ST Telemedia and has led the company's efforts in establishing itself as a leading wireless and global IP services company. Under his leadership, ST Telemedia has evolved into a significant information-communications company with operations and investments in the Asia Pacific region, the Americas and Europe. Prior to this, Mr Lee held various senior level positions in the former Singapore Technologies (ST) group of companies overseeing its legal and strategic business development functions. Mr Lee has served in the Singapore Legal Services for over eight years before joining the ST Group.

3-15  
-END

**Mr Steven Terrell Clontz**

Mr Steven Terrell Clontz was recently appointed Managing Director – North America and Europe for ST Telemedia. Until December 31<sup>st</sup>, 2009, Mr. Clontz was CEO of StarHub Ltd., where he had served since 1999. He continues to serve StarHub as a non-executive Director. Mr Clontz is a veteran in the telecommunications industry with 37 years of extensive experience in Fixed Networks, Mobile, and CableTV services. From 1996 through 1998, he served as President and Chief Executive Officer of IPC Information Systems Inc., based in New York. Prior to that, Mr Clontz was a senior executive with BellSouth International, where he last served as President of BellSouth Asia/Pacific between 1992 and 1995. He presently serves as a non-Executive Director on the Boards of Equinix and InterDigital Communications, both based in the USA. He also serves on the Executive Committee of Global Crossing, based in the USA.

**Mr Greg Sparks**

Mr Gregory Sparks was appointed to the Board of eircom Limited on 27 May 2009. He was also appointed as a director of the ERC entities on 1 June 2009. He is a founding partner of FGS, Chartered Accountants. He holds a number of other board appointments including The Irish Times and Digicel, the mobile operator in the Caribbean. He was a board member of the Special Olympics World Games and worked as Programme Manager for Dick Spring, a minister of the Irish Government from 1992 to 1997. He holds a BComm and is a member of the Taxation Institute of Ireland as well as a Chartered Accountant.

**Mr Paul Donovan, CEO**

Mr Paul Donovan has been CEO of eircom Group since July 2009. Paul has significant telecom management and senior leadership experience from several markets in the world, including Asia Pacific and Africa. Prior to his appointment as CEO of eircom Group, he was Chief Executive, EMAPA Region for the Vodafone Group. His background includes a decade in the fast moving consumer goods industry, before he moved into the technology sector, principally with BT and Vodafone. His career with Vodafone started 10 years ago and for the last five years, he has overseen Vodafone's operations in subsidiaries in Eastern Europe, Middle East and Asia Pacific. Africa, the US, India and China were added to his remit in 2006. As part of his role, he sat on the boards of numerous subsidiaries and joint ventures during this period. He was elected as a non-executive director of Millicom International Cellular SA in May 2009.

Commenting on the announcement, Ned Sullivan, Chairman said, "I would like to welcome our new shareholders and directors to the eircom board. I would also like to thank the retiring directors Colm Barrington, Nicky Hartery, Andrew Day, Peter Cross, Larry Smith and Cathal Magee for their contribution as directors of the Company and acknowledge their collective and individual efforts over the past number of years."

**ENDS**

For more information, please contact:

Paul Bradley  
Head of Communications  
eircom:  
Tel: +353 1 600 4281  
Mobile: +353 85 17 44 281  
[Paul\\_bradley@eircom.ie](mailto:Paul_bradley@eircom.ie)

Brian Bell  
Managing Director  
WHPR  
Tel: +353 1 6690 030  
Mob: +353 87 243 6130  
[brian.bell@ogilvy.com](mailto:brian.bell@ogilvy.com)

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Note of Meeting with STT,  
22 January 2010, Adelaide Rd.

Attending

- *STT*: Mr Terry Clontz, Mr Anupam Garg, Mr Stephen Miller.  
*Eircom*: Mr Paul Donovan, Mr Pat Galvin
- *DCENR*: Minister Eamonn Ryan, Ms Sue Duke, Mr Aidan Dunning,  
Mr Peter O'Neill, Mr Ken Spratt

Key Points

• *Opening Remarks*

Minister congratulated STT on closing the eircom deal and mentioned the opportunity it presents to STT/eircom and, hopefully, Ireland. STT (TC) mentioned the enormous amount of work done since 4 January 2010 (closure of the deal) on "calibrating" the eircom and STT views into a single view. The inaugural Board meeting took place on 21 January. Ned Sullivan staying on as Chairman. The new dawn has opportunities and challenges on the horizon.

Minister acknowledged the difficult position that STT/eircom are in and touched on recent hurdles that the Irish Government have had to clear.

• *Challenges*

The "balance sheet" challenge is the key short term challenge. STT/eircom have been in dialogue with ComReg and are happy that progress is possible and being made, albeit slowly.

- The cost base facing STT/eircom is significant and will be challenging to address effectively. The company's business case is being impacted (competition, recession)

*NGA Investment*

- As regards the longer-term, STT/eircom's experts are considering how best to move forward. They have studied various approaches in other countries. They mentioned that Governments can play a role through either (i) funding infrastructure (Singaporean Government funding was mentioned) or (ii) ensuring the regulatory environment is attractive for investment. STT/eircom sees industry collaboration as important for moving forward. STT stated that they believe that multiple "duplicating" networks is not a wise option for Ireland (inference to the need for proceeding carefully with any "one-stop-shop" or f-t-t-new build initiatives so as to facilitate private sector investment rather than acting in a way that gives rise to unintended consequences). The explosion in wireless data is forcing all operators to consider collaborative approaches to infrastructure sharing and investment. The explosion in data growth is happening at a time when industry revenues are receding which is a significant conundrum for all.

29/6

[REDACTED]

a round of CEO meetings will be held in February which will STT leadership will attend. Key focus will be moving forward collaboratively despite the constrained environment (industry revenues down €400 million y-o-y, or 11.2%) and avoiding everyone doing something alone which is sub-optimal for everyone.

- Clarity from Europe, in terms of (i) the telecoms package (which has been settled), and (ii) the regulation of NGA, would be useful. The legislation providing access to NRA/local authority ducting will be hugely beneficial to eircom in their NGA roll out. Planning matters (way leaves and permission for new cabinets perhaps) will be challenging.
- Eircom are undertaking a major piece of work on the economics of NGA roll out and would be happy to share their analysis with the department.

*DTT/ASO*

- [REDACTED] The business case for DTT is "tough". Three are "quantum" (termination rates, company guarantees mentioned) issues and timing issues but eircom are pushing on in good faith.

[REDACTED]

[REDACTED]. Recent announcement of "retail minus for wholesale content" in another jurisdiction was a welcome development which eircom would hope would be copied here. The Minister stated that ASO must happen to reap the digital dividend and will happen within the foreseen timeline (end 2012). PD stated that eircom is committed to an outcome and the next 4/5 weeks are crucial.

*Deal Closure and Eircom Board*

- AG updated the meeting on the final shareholding arrangements of the deal which will allow eircom to take decisions more speedily in the future. STT's high support for the deal means they are working with very stable shareholder base. The ESOT are represented on the Board and a good working relationship is in place.

[REDACTED]

*Summary*

- [REDACTED]
- Eircom appearing to be focussing on the potential commercial opportunity that the wholesale market presents.
- Eircom will focus on engaging/collaborating with MNOs to drive fibre to base stations and closer to homes/businesses.
- Engagement with ComReg is productive.
- DTT negotiations with RTE are continuing but difficult. Next 4/5 weeks will be key.
- ASO clarity and awareness would be welcome.

**ENDS**

(Attached: Minister's Brief, Eircom's PR on new Board)

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- END -

Issues and challenges for eircom/STT

Moving forward

- STT are now preparing to tackle the three big issues: (i) the cost base; (ii) the debt; and (iii) the relationship with ComReg. They also have the pension deficit but this does not appear to be a key concern.
- STT are looking forward to working with ComReg and the Department on these issues. [REDACTED]

Cost base

- ComReg see eircom as "an efficient operator" and are making regulatory decisions on that basis. [REDACTED]
- Legacy terms and conditions of employment (associated with previous civil service and semi-state status) are an obstacle to addressing the staffing surplus. [REDACTED]

ComReg/eircom

- [REDACTED]

- I have mentioned the KPN and BT Global services successes when they (reluctantly) decided to embrace wholesale market opportunities. [REDACTED]

Debt

- [REDACTED]

DTT and ASO

- They may touch on DTT and ASO. I understand eircom have been engaging with RTE and, although they are making progress in their discussions, there are significant challenges ahead. I understand they may also raise the need for an ASO awareness campaign.

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**Kenneth Spratt**

**From:** PGalvin@eircom.ie  
**Sent:** 23 February 2010 09:53  
**To:** Kenneth Spratt  
**Subject:** RE: Meeting next week  
**Attachments:** ATT11052662.txt

10/7

Ken,

[http://www.ofcom.org.uk/consult/condocs/nga\\_future\\_broadband/statement/statement.pdf](http://www.ofcom.org.uk/consult/condocs/nga_future_broadband/statement/statement.pdf)

The OfCom document on NGN from last year is probably the best guide to the wide set of issues around NGN development.

The glossary alone, starting on Page 84, is very good as an overall plain English education on the issues.

Reagrds,

Pat

---

**From:** Kenneth Spratt [mailto:Kenneth.Spratt@dcenr.gov.ie]  
**Sent:** 22 February 2010 17:31  
**To:** Galvin, Pat; Eanna O'Conghaile  
**Subject:** Re: Meeting next week

Thanks Pat.

The attendees will include Aidan, Peter, Dave Hanley, Eanna O'Conghaile, Roger O'Connor, Aidan Ryan, Eugene Dillon and me.

Ken...

---

**From:** PGalvin@eircom.ie <PGalvin@eircom.ie>  
**To:** Kenneth Spratt  
**Sent:** Mon Feb 22 16:11:44 2010  
**Subject:** RE: Meeting next week

Ken,

Hope you are well.

Re the Board meeting, its importance is that it will co-incide withour half-yearly results whcigh will be released this Thursday morning - 25th of February. The Board meeting is Monday. I will get you all the relevant briefing on the results as soon as possible on Thursday.

Re the NGN I will have a look for a high level documentation on NGN that might be useful for Aidan brief.

Can you say who else is coming on the 3rd?

Thanks,

Pat

---

**From:** Kenneth Spratt [mailto:Kenneth.Spratt@dcenr.gov.ie]  
**Sent:** 22 February 2010 12:21

To: Galvin, Pat  
Subject: Meeting next week

Pat,

Could you let me know if there are any concepts which I might usefully explain to Aidan in advance of the meeting next week? For example, I intend to try to explain "point to point" and "point to multi-point" options for fibre roll out. In other words, are there any concepts that we should understand before the meeting to make better us of the meeting?

Zd7  
- END -

Also, can you advise regarding the next eircom Board meeting? You mentioned that it will be an important meeting. Is there anything that you can share with me that I might brief Aidan on? When is it?

Thanks,

Ken.

Ken Spratt  
Principal  
Communications Policy Division  
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Deimhnítear leis seo freisin nár aimsíodh víreas sa phost seo tar éis a scanadh.

Kenneth Spratt

From: PGalvin@eircom.ie  
Sent: 02 March 2010 10:44  
To: Kenneth Spratt  
Subject: RE: Tomorrow

Attachments: Innovation Task Force eircom Submission September 2009.pdf; ATT16738730.txt

Ken,

Tomorrow is mainly about a sharing of our analysis of the NGA challenge - not a brief on any implementation options. The latter are dependent on key variables - both internal and external.

I am not sure to what extent Paul will wish to get into wider shareholder issues etc - I expect not at this stage.

At a high level, there are perhaps 3 separate but related themes:

1 All countries are grappling with the NGA agenda. Some eg Australia, Holland etc are reaching conclusions at Government level as to how the national challenge will be addressed. Ireland needs to reach conclusions also - sooner rather than later.

2 The consensus emerging is that fibre is the "game-changing" technology - national fibre access networks regulated to allow full open interoperability in conjunction with NGA wireless BB as appropriate to more favourable geographic areas.

3 Rapid development of full nationwide fibre access networks is beyond the capability of any one stakeholder. The choice therefore is to allow private investment to incrementally happen probably through collaborative measures which would see major urban areas being targeted - but over over a prolonged roll-out period.

[Redacted] (Needless to say a regulatory focus away from regulation of historical copper networks to a future looking fibre world would be a prerequisite)

BTW, some of these themes were covered in our submission to the Innovation Task Force, which I sent to you last Autumn. As I understand that Report is now imminent, I attach our submission again for your information.

See you tomorrow,

Regards,

Pat

---

From: Kenneth Spratt [mailto:Kenneth.Spratt@dcenr.gov.ie]  
Sent: 02 March 2010 08:38  
To: Galvin, Pat  
Subject: Tomorrow

Pat,

Thanks for the NGN material you sent over. Very helpful. I will brief Aidan this afternoon. Is there anything that you think would be useful for me to mention to him? Any key messages that eircom would like to deliver tomorrow or anything else that he needs to watch for?

Thanks,

Ken.

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Deimhnítear leis seo freisin nár aimsíodh víreas sa phost seo tar éis a scanadh.

## The Innovation Task Force

Submission by eircom

September 2009

### 1 Introduction

Eircom offers services to the wholesale and retail telecommunications market in Ireland. eircom's retail business is focussed on providing innovative and cost effective services for the consumer and enterprise markets. The ongoing transformation of this market to a competitive multi-platform environment has conferred key economic benefits to Ireland in the past 5 years and will be a key enabler of economic recovery and growth.

This submission will confine its comments to the issue of network infrastructure and the key challenge of providing a mainly-fibre national access network. Achieving such a goal would be the critical building block for the long-term growth of ICT based enterprise. Its effect would be transformational in similar terms to the original digitalisation of the national network under the Accelerated Development Programme in the 1980s.

### 2 What is the current position on Broadband Infrastructure?

The first-generation broadband market in Ireland is already exhibiting the effects of rapidly developing inter-platform competition using fixed networks, mobile networks, cable and satellite. The rapid development of mobile and wireless broadband reflects Ireland's unique geographic/demographic characteristics, including an island setting that provides a very hospitable environment for the use of spectrum. Key current developments are:

- Availability and take-up of first generation broadband has improved significantly in the past twelve months and in general, speeds and prices compare favourably with other Member States;

- Copper network based broadband (using DSL technology) is declining in terms of its overall platform share of the broadband market (including cable, mobile and Fixed Wireless Access ("FWA")) – approximately 54 percent of all connectivity.

- It is estimated that 3G/HSDPA is available to over 90 percent of the population with overall mobile broadband penetration at 28 percent and growing. In the residential space, a recent survey commissioned by ComReg has found that use of mobile broadband "increased markedly last year with 18 percent of home internet users now using this access method," as compared to 8 percent in Q2 2008.<sup>1</sup>

- UPC has consolidated what had previously been a fragmented cable television industry and is now at the mid-stage of a three-year programme to upgrade broadband in major urban centres servicing a total customer base of 35 percent of the population, which would equate to approximately 55 percent of the addressable market capable of being served on a commercial basis by wireline NGA (as discussed below).<sup>2</sup>

- There has recently been significant investment in NGN by fixed and mobile operators. However, this has so far been mainly focussed on the core network capability. eircom will complete national roll-out of its core NGN network by 2011. The Irish Government has funded the construction of fibre rings (Metropolitan Area Networks) in over 90 cities and towns. State-subsidised services from these networks are used by other fixed and mobile operators to compete with eircom in the provision of broadband services at the wholesale and retail levels on a nation-wide basis.

<sup>1</sup> ComReg Consumer ICT Services Survey Q2, 2009 –

[http://www.comreg.ie/publications/comreg\\_consumer\\_ict\\_services\\_survey\\_q2\\_2009\\_583-1034311n.html](http://www.comreg.ie/publications/comreg_consumer_ict_services_survey_q2_2009_583-1034311n.html)

<sup>2</sup> Irish Communications Market ComReg Quarterly Reports – various at [www.comreg.ie](http://www.comreg.ie).

- Transparency and security of supplies, for example, food security and traceability;
- The management of distribution and freight systems using radio frequency identification, etc.;
- Cash-free payment systems;
- Remote tele-services; and
- Virtualisation of work.

However, the NGN/NGA networks required to support these developments have yet to be built and in a fully liberalised, competitive telecommunications market, the commercial case for their widespread development is extremely challenging.

#### 4. What are the major challenges to be addressed in upgrading the national network to mainly fibre services?

The deployment of ubiquitous broadband access networks in Ireland has historically presented the largest obstacle to network upgrade and this challenge will be even greater in the roll-out of NGA.

Although the "last mile" issue is not unique to Ireland, the scale and scope of the problem represent far greater challenges than in most other EU countries. This is due primarily to Ireland's unique demographic structures and relatively low population density<sup>4</sup>. Compared to other Member States, a smaller proportion of the Irish population resides in urban areas and, even within these urban areas, the population tends to be lower than in other Member States. In non-urban areas, there is relatively little population clustering and a significantly longer tail of high cost rural customers. As a consequence, the

<sup>4</sup> Further detailed breakdown of the impact of demography on the economic case for NGA in Ireland is presented by ComReg in D09/56 Next Generation Broadband in Ireland – at [www.comreg.ie](http://www.comreg.ie), July 2009.

### 3 How would a transformation to a fibre-based Next Generation Access network contribute to economic development and innovation?

The Irish economy has been severely affected by the recent downturn leading to economic contraction with declining consumer demand and reduced investment in enterprise. In addition, a chronic deficit in public finances means that economic recovery may take significantly longer than in other Member States and will certainly limit the extent to which the Irish Government can fund ICT infrastructure (within EU State Aid rules).

eircom believes that the development of Next Generation Networks ("NGNs"), including Next Generation Access (NGA) networks, is critically important for Ireland's economic recovery and sustainable future development. Primarily, it will enable the transformation to an economy that focussed on externally traded high-value services, especially in the ICT sector.

For example, the following ICT developments identified by Forfas<sup>3</sup> will require ubiquitous availability of ultra-band services over fibre and equivalent NGN platforms:

- Roll-out of location-based services using ambient intelligence, pervasive computing, and embedded intelligence;
- Development of intelligent transport systems using Global Positioning Systems and other technologies that manage the flow of people, goods and services, including pay-as-you-go systems for transport, insurance, etc.;
- Technologies for independent living, including embedded sensors;
- The growing use of biometrics for health and security purposes;

<sup>3</sup> Sharing our Future – Ireland 2025 Forfas, July 2009.

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cost of access-line provision in Ireland is estimated to be up to 45 percent higher than in the EU15.<sup>5</sup>

Recently collected data on Ireland's housing stock (*i.e.* habitable residences) provides evidence of the reality of the country's NGA investment challenge. The Irish national housing stock totals over 1.9 million units – an increase of over 33 percent since 1997. Detached houses constitute 43 percent of the national housing stock, with just 10 percent being apartment blocks. More than 33 percent of the national housing stock comprises one-off housing (*i.e.* detached housing in the open countryside). Furthermore, the percentage of one-off housing actually increases as one moves towards the more peripheral parts of the country. For example, in 2007 one-off houses represented 40 percent and 47 percent, respectively, of the Western seaboard counties of Mayo and Donegal.<sup>6</sup>

Mainly because of these demographic factors, it is estimated that the cost of upgrading the Irish access network to an FTTC solution for the top 65 percent of exchanges (reaching approximately one million homes or 68 percent of the population) would be between €400 million and €500 million. It is estimated that an FTTH solution could cost €2,000 per home for new-build premises and €2,500 per home to retrofit existing premises. The business case for this investment on a national basis is extremely difficult to establish.

#### 5 What is the current policy approach?

In line with the overall objectives of EU sectoral policy on telecommunications, the Irish Government has concluded that NGN/NGA investment will be led primarily by the private sector facilitated by a regulatory regime that encourages investment and the development of sustainable competition<sup>7</sup>. However, similar to the position on 1<sup>st</sup> generation Broadband, Government intervention of some type may be necessary to ensure that NGN/NGA networks will be provided in areas where the commercial case for private investment cannot be made. The particular features of the Irish

<sup>5</sup> Access Network Cost in Ireland – A Study by Dufécon, November 2008.

<sup>6</sup> Department of Environment Housing Statistics Annual Report – Various.

<sup>7</sup> Next Generation Broadband – Gateway to a Knowledge Ireland, June 2009.

market (scale, demographic density and dispersion) make such Government intervention essential if the goal is to achieve ubiquitous NGN/NGA networks with minimal digital divide.

The extent of State intervention (if any) would depend on the level of geographic/demographic coverage that private investment can achieve. In first generation broadband, the Irish Government, with EU Commission approval, introduced a State-funded National Broadband Scheme to in-fill the last 10 percent of the population. In an NGA environment, this is likely to be at a higher percentage of the population, with Government intervention governed by the EU Commission's recent Communication on the application of State Aid rules in relation to rapid broadband deployment. The percentage of the population that will ultimately be able to access NGA networks built by means of private investment will depend to a large extent on the key inputs to the investment case including the anticipated impacts of regulation.

#### 6 Can ubiquitous fibre access networks be achieved?

The achievement of universality in service provision has been a long-standing feature of telecommunications policy. This is reflected in the provision of a universal telephone service on a nation-wide basis. Eircom is the current designated provider of the universal service. Maintaining the principle of universality in a Fibre-based NGA world presents a huge economic challenge, as, inevitably, construction of fibre based access networks would be focussed initially in major urban centres. In general, the investment decisions of market operators should be aligned with the wider economic and developmental policies of Government. For example it would seem that the National Spatial Strategy should provide the template for priority in terms of access-fibre network investment which would in turn facilitate the clustering of enterprises dependent on ultra-band width telecommunications services.

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## 7 Conclusion

In conclusion, eircom would propose that the following principles, if applied, would facilitate the development of a national Next Generation Access network:-

*Given the challenging business case and the long-term benefits to the economy of a transformation of the national access network, the primary and immediate objective of public policy supported by the regulatory framework must be to ensure that these NGN/NGA networks are built.*

*The secondary objective of public policy should be to ensure that the requirement for Exchequer involvement is minimised by encouraging investment by market operators to the greatest extent possible. The regulatory model applied to the investment has a key role to play in achieving this objective.*

*A key enabler would be the alignment of operators' investment strategies with the wider economic objectives of Government, specifically in relation to targeted locations for economic development. This would also require policy objectives to minimise the extent of any subsequent digital divide throughout the country.*

Despite the many challenges, eircom is confident that all stakeholders can develop a fair and reasonable roadmap for achieving the objective of world-class NGN/NGA in Ireland. eircom has invested €1.1 billion in its networks in the past three years, which represented an increase of over 30 percent in investment levels on the previous three-year period. If the business case for NGA is sustainable, based on clear customer demand and a fair regulatory regime, it will be in a position to further increase investment levels to develop the NGA network.

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end -

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**Meeting with Singapore Technologies Telemedia  
Singapore, 18 March 2010**

**Present**

**STT**

- Mr. Lee President and CEO
- Mr. Terry Clontz
- Mr. Anupam Garg
- Mr. Stephen Miller
- Ms. Kweejee Kuan

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**DCENR**

- Minister Eamonn Ryan
- Peter O'Neill, Assistant Secretary
- Richard O'Brien, Ambassador
- Ken Spratt, Principal
- Micheál Smith, First Secretary
- Colm O'Conaill, Runaf Aire

**Key Points made by STT**

STT gave an overview of their assessment of the "future strategic plan" for eircom. They made the following key points.

- **Investment Focus**

[REDACTED] In addition to a conducive economic environment, there are two issues that need to be resolved [REDACTED]

- i. Regulatory clarity: clarity regarding the regulation of bundles, USO (what revised obligations will be put on eircom) and [REDACTED]
- ii. Clarity on co-investment: other industry players who would benefit from the roll out of NGA need to meet some of the costs associated with infrastructure roll out.

- **Eircom and NGA**

Eircom have completed their NGA analysis. The investment requirements are "upfront and substantial". Encouragingly, open access is a key element. So too is co-investment. While eircom are encouraged by their engagement with other operators on this matter, [REDACTED]

[REDACTED]

The regulatory clarity already mentioned will be required to encourage investment in fibre. Cooperation from the Local Authorities (on issues such as way leaves,

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planning development charges, and planning permission for street cabinets) will also be required to facilitate speedy deployment in due course.

[REDACTED]

- Immediate Challenges

STT mentioned the "extremely difficult trading environment" (mentioning in particular well capitalised brands being able to compete aggressively with eircom), their "highly levered capital structure", their "inefficient labour cost structure" and their USO. On USO, they emphasised the [REDACTED]

[REDACTED] While the LLU and LS decisions were not challenged, the impact on eircom will be significant with wholesale revenues expected to decline by about [REDACTED] and a possible reduction in retail revenues of up to [REDACTED]

- Customer Focus

To date, eircom have had a "product focussed" approach. STT have initiated a process to ensure eircom becomes more customer focussed. That will mean a stronger focus on bundling of services to suit customer needs. [REDACTED]

- DTT

[REDACTED] Discussions with RTE are continuing. [They have since collapsed.] Certainty around ASO and associated funding would help.

- New Legal Entity – Wholesale access

### Minister's Replies

A discussion followed and Minister Ryan asked a series of questions as well as setting out DCENR's position on each of the matters raised.

As regards "Investment Focus", he welcomed the fact that a strategic, investment focussed strategy is being developed. He hoped that the stable policy and regulatory

environment has facilitated their consideration of the matter. Minister Ryan agreed that those who might benefit should co-invest and he would welcome clarity from industry on the matter and said that his officials are available to facilitate (and/or participate in) those discussions if required.

3 of 9  
-end-

On "eircom and NGA", the Minister welcomed eircom's intention to spearhead a significant NGA investment and acknowledged that co-investment from industry would be required. He said he would welcome co-investment and expressed confidence in ComReg's competence and capability to help drive an appropriate path forward.

As regards "Immediate Challenges", the Minister again acknowledged the difficulties that eircom are facing into. His officials would raise the matter of the USO [redacted] with ComReg. The Minister emphasised that regulation and the USO are complex matters for consideration and decision by the independent regulator.

On "Customer Focus", the Minister welcomed the move to put the user at the heart of eircom policy and business operations. [redacted]

As regards DTT, the Minister highlighted that RTE are aware of DCENR's desire that commercial DTT would happen sooner rather than later. The Minister has set Q4 2012 as Analogue Switch Off date (although the question of funding has not been considered).

ENDS

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9 June 2009

Mr Eamon Ryan, TD  
Minister for Communications, Energy & Natural Resources  
Department of Communications, Energy and Natural Resources  
29-31 Adelaide Road  
Dublin 2  
Ireland

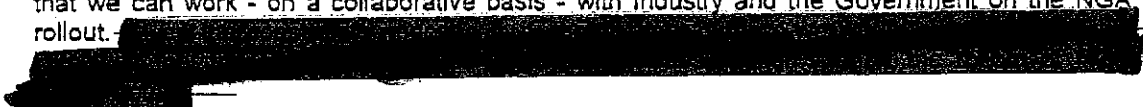
12/10  
— and —

Dear Minister Ryan

On behalf of Singapore Technologies Telemedia, I would like to thank you for taking valuable time from your schedule to meet us in Dublin. We are particularly grateful for your insights into Ireland's future economic prospects and the expectations from Eircom.

We would like to reiterate our interest in investing in Eircom. We believe that we have the necessary skills, resources and long term commitment to not only enable Eircom to grow, but also support the objectives set out in the Government's smart economy policy document.

Our visit has given us an appreciation of the importance of Next Generation Access ("NGA") deployment to Ireland. If the Eircom transaction goes ahead with us, we would sincerely hope that we can work - on a collaborative basis - with Industry and the Government on the NGA rollout.



Thank you again for your time and kind assistance.

Yours sincerely

Anupam Garg  
Senior Vice President  
International Business Development

FAO \_\_\_\_\_  
For Observations \_\_\_\_\_  
For Action \_\_\_\_\_  
For Follow Up \_\_\_\_\_  
For Information \_\_\_\_\_  
C.C. POU, AD, PC, MS, SO  
Date 9 June 09

Office of the Minister  
Dept. of Communications, Energy And  
Natural Resources

9 JUN 2009

Óig  
Roinn Cumarsáide,  
Fuinnimh agus Acmhainní Náúráil

Note of Meeting with STT,  
10 June 2010, Leinster House

Attending

- *STT*: Mr Terry Clontz, Mr Stephen Miller.
- *Eircom ESOT*: Mr Jerome Barrett
- *DCENR*: Minister Eamonn Ryan, Ms Sue Duke, Mr Aidan Dunning, Mr Peter O'Neill, Mr Ken Spratt

Key Points

• *Update from STT*

As Minister Ryan's time was limited, Terry Clontz speedily updated him on developments since the last meeting in Singapore in March. Key updates:

- [REDACTED]
- STT/eircom complimentary towards ComReg's collaborative approach to discussions on difficult issues although STT/eircom believe that significant challenges remain to be concluded by the discussions;
- [REDACTED]
- STT/eircom continuing with their analysis and plans for f-t-t-h pilot roll out which will inform their longer term plans for a wider roll out;
- [REDACTED]
- [REDACTED]
- [REDACTED]
- STT/eircom have appointed Mr. Andy Hare as the new Head of Government Affairs / Public Relations.

• *Minister's Responses and Discussion*

Minister Ryan welcomed the progress on various fronts, particularly the fact that eircom and ComReg are engaged in collaborative consideration of difficult issues. He emphasised the independence of the NRA and expressed his full confidence in ComReg's capability and competence in such a difficult area. He also mentioned his support for ComReg's regulatory approaches and decisions.

[REDACTED]

Some discussion took place regarding the company's financial position and refinancing options being considered by the new financial advisors. The decline in EBITDA has moderated and the employees have responded well to the call for voluntary redundancies.

- The meeting ended. A further meeting at the end of July is expected.

ENDS