

Submission to the Business Regulation Forum
From Roscommon County Enterprise Board Ltd

1. Start with our own business/company.
 - i. There is an unnecessary burden of compliance with auditing requirements for County Enterprise Boards and there are unnecessary costs imposed on us as a result.
 - auditing by own our accountants
 - auditing by Comptroller and Auditor
 - auditing internal control procedures

Our overall budget is less than €1m per annum and auditing costs currently account for 3% of our administration budget. Auditing for different requirements imposes excessive costs on our operation.

2. Small to medium sized companies require audit regulation but the limit for exemption on full audited accounts should be raised along the lines of the UK and should have an automatic, every two years, raising of this limit.
3. Radical and immediate reform of public services with monopoly supply- outlaw restrictive practices.

- i. E.S.B**

It is currently a nightmare for any S.M.E seeking a power supply for a new unit currently the S.M.E has to deal with two sections:

- a) Billings Department
- b) Network Supplies

Our experience is that these two sections within ESB do not communicate directly with each other-all communication from the applicant must go through 1850 numbers-delays of 20-45 minutes are normal and then to be told to ring another 1850 number. Because of these restrictive practices, if 10 S.M.E units apply for an ESB connection and they land on the desk of John Doe and he/she is out sick for six months-those applications stay there and are not dealt with until they return. Also any minor flaw in filling out the application form is used as reason for not dealing with an application promptly but nobody comes back to tell the applicant-delays of 1 year plus are not uncommon.

Charging is arbitrary in the sense that there is no visible method which informs the customer of the proper rate applicable to them. All queries on bills have to go through the ESB billings section and they have no interface with the Network Supplies Section. From our experience on a recent project, this lack of interfacing between the two sections resulted in the threat of disconnection.

- ii. Eircom- last mile unbundling of broadband.

Solution: the regulation is not tough enough with Eircom to subscribe or meet performance targets to provide universal access to Broadband.

4. Implementation of Employment Law

S.M.E's need to have a solicitor in house to correctly dismiss an employee, who deserves to be dismissed.

It is accepted that summary dismissal is not acceptable but the current problem arises from the fundamental shift of "proof of innocence" away from the employee to the employer- because of this shift the employer is being fined heavily for dismissing an admitted thief simply because he/she omitted some part of disciplinary proceedings. This is costly and demoralizing.

Solution: The Unfair Dismissals Tribunal should be mandated to accept "general adherence to procedures and fair treatment of employees" instead of strict adherence to clauses.

5. Local Authority Reform in relation to rates/funding

The burden of financing local authorities for services is falling entirely on the business community. Case studies of our clients have shown that charges are being levied at time of granting planning permission for services *not* incurred by the SME. Cases where extensions to premises *not* incurring addition of services from the local authority- when the SME requests a breakdown from the authority, the breakdown shows the charges are for the provision of general services including library services etc.

Solution: In the interest of fairness, rates should be borne by all the public.