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SPECTRUM STRATEGY – T-105 – CALL FOR INFORMATION

SURE (JERSEY) LIMITED ✂ RESPONSE

INTRODUCTION

1. This is Sure (Jersey) Limited's ("Sure's") formal response to the Jersey Competition and Regulatory Authority's ("the JCRA's") Spectrum Strategy Call for Information ("the consultation"), dated 19th March 2025.

2. ✂.

3. Sure fully supports the development of a local spectrum strategy. We additionally support the JCRA's proposed approach to developing its strategy, its proposed spectrum objectives, and its proposal to retain close alignment with the UK on spectrum management decisions and policy.

4. Whilst we broadly support the designation of 3.8 – 4.2GHz and 26GHz and 40GHz bands ("mmWave") for 5G services and the JCRA's decision to make these available in a reasonable timescale, Sure does not believe the time is currently right to allocate or auction this spectrum. ✂. We therefore believe that the JCRA's time in the short run would be best served by reviewing and re-allocating spectrum within the 800MHz, 900MHz, 1800MHz, and 2100MHz bands, and making licensing for spectrum usage technology neutral and fit for purpose.

5. Where the JCRA does decide to allocate 3.8 – 4.2GHz and/or mmWave spectrum in the short term, we propose that the JCRA do it on a first come, first serve and do so in a manner which is centrally managed and transparent. We additionally propose that the JCRA impose certain conditions on the acquisition and usage of that spectrum to prevent hoarding, speculative applications, and to ensure that the bands can be quickly and efficiently be re-farmed should it required for other, higher priority purposes in the future.

6. Sure is interested in increasing its spectrum allocations in certain, already allocated bands. In this response, we outline the bands within which additional spectrum is required, and propose methods to efficiently and fairly re-farm and re-allocate that spectrum. ✂. We

therefore request that the JCRA consider our representations in this consultation response and engage with us, and other interested parties, to allocate any currently available spectrum in the 800MHz, 900MHz, 1800MHz, and 2100MHz bands.

ANNEX 1

Question 1: Do you have any comments on the Authority's plans to develop a local spectrum strategy and proposed approach?
Sure fully supports the JCRA's plan to develop a local spectrum strategy, its proposed approach, and its planned process and timetable. We look forward to engaging with the JCRA on this topic to develop a spectrum strategy that supports the delivery of mobile and other services in Jersey. We note that there are significant ongoing developments in the UK regarding the release of above 3.8GHz spectrum. Whilst it may be politically tempting for the JCRA and States of Jersey to simply follow Ofcom's lead in releasing these spectrum bands for use, and therefore develop a strategy that aligns with the UK's approach, we urge the JCRA to carefully consider whether the known use-cases for such bands are applicable in Jersey and not prematurely make these bands available.
Question 2: Do you have any comments on the Authority's updated spectrum objectives?
We broadly support the JCRA's proposed objectives. We are particularly supportive of the JCRA's proposal to work with Guernsey wherever possible to ensure alignment on spectrum licensing.
Question 3: Do you have any comments on the Authority's approach to retaining a close alignment between spectrum decisions in the UK and Jersey?
We support the JCRA's proposal to remain closely aligned with the UK on spectrum management decisions, whilst also retaining the ability to ignore UK-specific conditions that are not applicable in Jersey.
Question 4: Do you have any comments on Government of Jersey policies or expectations relating to the future licensing and management of local spectrum?
We support the Government of Jersey policies and expectations as set out in the Call for Information.
Question 5: Do you have any views or comments on future demand for local spectrum and steps that should be taken to ensure these are met?
Sure does not have any comments on future demand for local spectrum at this time. However, Sure notes that data usage in Jersey continues to increase exponentially each year, and the JCRA should ensure that sufficient spectrum is made available to meet those capacity requirements.
Question 6: Do you have any views or comments on the optimum local approach to opening-up the 3.8-4.2 GHz band in Jersey?

We welcome the opportunity to agree an approach to opening up the 3.8 – 4.2GHz band (n77 band) in Jersey and are grateful to the JCRA for taking a forward-thinking approach to this band. However, we do not believe that the time is right to set in stone the conditions for allocation and usage. This is for the following reasons:

- **Demand** ✂, allocation of 3.8 – 4.2GHz band at this stage is likely to result in those allocations going unused in the short-to-mid-term. Furthermore, unlike in the UK, 5G services using 3.4 – 3.8GHz band (also known as band n78) have not yet been made available in Jersey due to Sure and JT currently building out their 5G networks. As a consequence, users and customers that could be interested in 5G for use-cases have not yet had an opportunity to explore whether the 3.4 – 3.8GHz band is capable of facilitating their use-cases, or whether 3.8 – 4.2GHz band spectrum is needed instead. We therefore believe it would be more appropriate and efficient for the JCRA to hold off developing an allocation process for this band, and instead revisit the allocation of 3.8 – 4.2GHz band spectrum once 5G networks have been fully deployed in Jersey and the full 200MHz of 3.4 – 3.8GHz band made available to Sure and JT is in use.
- **Licensed operator capacity** – Given ✂, our ongoing network refresh, and deployment of new 5G island-wide network (using the 3.4 – 3.8GHz band), we do not currently consider the deployment of localised, small-scale 5G networks that utilise 3.8 – 4.2GHz band spectrum to be a priority. Sure's ongoing island-wide 5G network deployment is a substantial project that is currently consuming the majority of its mobile engineering resource, and Sure would like to first complete this 5G network deployment of band n78 spectrum before reviewing if there is a need for 3.8 – 4.2GHz band spectrum.

Notwithstanding the above, should the JCRA wish to proceed in developing a process for allocating the 3.8 – 4.2GHz band regardless of our contentions, then we suggest that the JCRA adopt a similar approach to that adopted by Ofcom. In the UK, Ofcom manages access to 3.8 – 4.2GHz band on a first come, first serve basis, and are technically coordinated by Ofcom (i.e. the use of specific frequencies within certain geographies is monitored and managed by Ofcom). We support this approach and agree with the general feedback from UK participants that such an approach is "simple, fair, and easy to understand". We additionally suggest that the JCRA should publish records of where 3.8 – 4.2GHz band spectrum is being used and by whom.

In our view, such a centralised approach should be adopted along with appropriate safeguards in order to prevent spectrum hoarding (which one local operator, Clear Mobitel, has engaged in repeatedly) and to ensure that the band can be quickly and efficiently be re-farmed should the n77 band be required for other purposes in the future. For example, we suggest that the JCRA should include one or more of the following in its licensing framework for 3.8 – 4.2GHz spectrum:

- **Fees** – due to the fact that Ofcom annual licensing fees ("ALFs") are only payable to Ofcom once the spectrum is in use, there remains a risk that n77 spectrum could be obtained and then hoarded by prospective users. Similarly, the JCRA could be subject to numerous speculative applications from those who do not intend to appropriately utilise it for the benefit of Jersey. This is because prospective users could, theoretically, obtain an allocation of n77 band spectrum for a given geography (or the whole island if for a fixed wireless access ("FWA") solution) for free, and sit on that spectrum without using it. As there would be no cost associated with the spectrum while not in use, there is little incentive on the part of the holder to change this in a timely manner. This risk is particularly acute should the JCRA make allocations of n77 band spectrum available to companies and users which are not licensees (and therefore not subject to JCRA supervision, investigation, and enforcement action) (see below)[1]. We propose that some form of non-refundable application fee or small usage fee be imposed on prospective users for access to n77 spectrum to prevent speculative applications and hoarding.
- **Usage conditions** – Similar to the conditions contained within the Full Service and Limited Service spectrum packages, we propose that any allocations of n77 band spectrum should include usage conditions and allocations should only be made on receipt of evidence that the requested spectrum will be utilised for the benefit of Jersey. For example, the application process for spectrum should include a requirement to explain, and provide tangible evidence demonstrating, that the applicant has a credible use-case, that they have the financial means, technical knowledge, operational capability, and requisite demand to deliver that credible use-case. Similarly, any licence for use of n77 band spectrum should contain obligations to utilise spectrum and/or deliver a stated use-case within a specified timeframe, and do so in a manner which protects the environment and the residents of Jersey.
- **Periodic reviews** – we contend that 3.8 – 4.2GHz band spectrum should be made available for specific, localised purposes with a maximum term. For example, licenses could be granted with a maximum term of three or five years before the usage and use-case must be reviewed by the JCRA, or a new application submitted by the incumbent. This approach would be beneficial for two key reasons:
    - It enables the JCRA to undertake periodic reviews to ensure that the spectrum being utilised in accordance with any commitments or usage conditions; and
    - It would make any potential re-farming activity within the band more straightforward and predictable for those who hold 3.8 – 4.2GHz band spectrum.

[1] Note, Ofcom operates an open licensing regime for telecommunications networks and services in the UK (also known as a general authorisation regime). This is different to the individual licensing regime operated by the JCRA in Jersey. We address this issue on page 5 and 6 of this response.

- **Licensing** – should the JCRA wish to follow Ofcom's approach to allocation of 3.8 – 4.2GHz band spectrum, then the JCRA may need to make adjustments to its licensing framework to enable take-up for innovative purposes.

  Ofcom has made the 3.8 – 4.2GHz band available to all – "with no restrictions on eligibility for licences"[2]. This is possible in the UK because Ofcom operates an open licensing regime for telecommunications in the UK. Specifically, the UK uses a general authorisation regime under the Communications Act 2003, rather than a traditional individual licensing system (as seen in Jersey). As a consequence, prospective users of the 3.8 – 4.2GHz band do not require an individual license to operate an electronic communications network or provide services; providers are automatically authorised to operate, as long as they comply with the General Conditions of Entitlement set by Ofcom.

  However, this is not the case in Jersey. Those who wish to operate an electronic communications network or provide electronic communications services require an operating licence (either Class 1 or Class 2) from the JCRA. Given the implications of being a licensed operator in Jersey ,such as being subject to licence fees and regulatory supervision, there is a risk that the need for a licence could be perceived as a barrier to application by some organisations or individuals, and ultimately have a chilling effect on demand (and therefore innovation). In the event that the JCRA follows Ofcom's lead in making available the 3.8 – 4.2GHz band, we request that it clarify its approach to licensing for use of this spectrum.

Question 7: Do you have any views or comments on the local approach to designating the mmWave band in Jersey and on the appropriate timing for an allocation and licensing process?

We support the JCRA's proposal to designate the 26GHz and 40GHz bands ("mmWave") as the 5G high-band, consistent with the UK and other jurisdictions around the world, and are additionally supportive of the JCRA's proposals to follow the UK and other jurisdictions in reserving this band for island-wide 5G coverage (our mobile network vendor has already confirmed that equipment for these bands have already been developed and are available).

We do not object to the JCRA making mmWave spectrum available in the near future. However, we remain sceptical that there will be demand for mmWave spectrum in Jersey in the short-to-mid-term given Jersey's size, scale, and economy. As recognised by the JCRA in the consultation, and as explained by Sure in response to the JCRA's 2022 assessment of interest and demand for 5G services (T1480GJ), many of the use-cases cited in other jurisdictions for the deployment of 5G spectrum, particularly higher-band 5G spectrum, are less persuasive or relevant in Jersey. For example, there is likely to be a relative lack of demand for 5G fixed wireless access ("FWA") due to Jersey's ubiquitous fibre network and the availability

[2] Enabling wireless innovation through local licensing - Shared access to spectrum supporting mobile technology – Statement – 25th July 2019. Available at enabling-wireless-innovation-through-local-licensing.pdf.

of high broadband speeds. Similarly, due to Jersey's unique size and scale, it does not have ultra-dense locations on the island that may require additional high-capacity mmWave mobile services to meet demand (St Helier is the most populous location in Jersey with a population of approximately 36,000 people; fewer people than many mid-sized towns in the UK). The industrial use-cases cited by the JCRA in the consultation, and by Ofcom in its various consultations, do not neatly align with the most prominent economic sectors in Jersey (manufacturing, agriculture, and gaming).

Notwithstanding the above, and in line with our response to Question 6, should the JCRA proceed with its decision to allocate mmWave spectrum in Jersey, then we request that this be done on a first come, first serve basis, with the JCRA technically coordinating access and usage. We additionally recommend that the JCRA also implement appropriate safeguards in order to prevent spectrum hoarding and to ensure that the band can be quickly and efficiently be re-farmed should mmWave be required for other, more important purposes in the future. Such safeguards should include, but not be limited to, the fees, usage conditions, periodic reviews, and appropriate licensing mechanisms cited in response to Question 6.

Question 8: Do you have any specific interest in the historically unallocated and unlicensed local spectrum allocations in 2G/3G/4G bands between 800 MHz and 2600 MHz, or views or comments on the ideal future regulatory approach towards them?

Please see Sure's response to Question 10 for further information about Sure's interest in unallocated 1800MHz and 2100MHz spectrum. Sure does not currently have any demand for 1400MHz, 1900MHz, 2300MHz, or additional 2600MHz spectrum.

Question 9: Do you have any specific interest in the currently unallocated and unlicensed local 5G Full Service or Limited Service spectrum packages, or views or comments on future regulatory approach towards them?

Sure does not currently have any interest in the currently unallocated spectrum that has been reserved for Full Service and Limited Service spectrum packages.

However, should there be insufficient interest in the 700MHz band or the available Full/Limited Service spectrum packages, Sure would be interested in increasing its current allocation of 2 x 10MHz to 2 x 15MHz. Sure would use this additional allocation to improve capacity in rural areas on its new, standalone 5G network in Jersey (particularly those areas with lower base site density and therefore less high capacity 5G coverage). Whilst Sure hopes to repurpose some existing 800MHz and/or 900MHz allocations for 5G in the future, this is not currently possible for licensing and technical reasons, and therefore additional 700MHz spectrum is needed in the short term.

Question 10: Do you have any specific interest in the current spectrum allocations licensed to Airtel that will become available for reallocation in the future, or views or comments on future regulatory approach towards them?

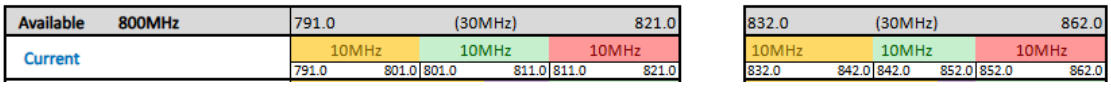
We welcome the JCRA's decision to make available Airtel's historic spectrum holdings for reallocation. Sure has an interest in these spectrum holdings, and we believe that Sure's acquisition of Airtel, and the ongoing reallocation process, presents an opportunity for the JCRA to more efficiently and fairly allocate spectrum in the 800MHz, 900MHz, 1800MHz, and 2100MHz bands. This includes refarming spectrum in certain bands so that spectrum is allocated as efficiently as possible (e.g. to prevent small unusable ranges from being created between different allocations), preventing the need for infrastructure proliferation in order to take advantage of available spectrum, and/or to minimising the cost of taking on additional spectrum. We explain Sure's proposals on a band-by-band basis below.

Please note, the colours in the diagrams used in Sure's proposals for each band correlate to the following parties:

Airtel Vodafone
Jersey Telecom
Sure
Clear Mobitel
Available
Released/Available

800MHz Band

Airtel is currently holding 10MHz of paired spectrum (i.e. 2 x 10MHz) in the 800MHz band. Airtel's spectrum holding is at the top of the 800MHz band, with Sure and JT sitting below it as per the diagram below.

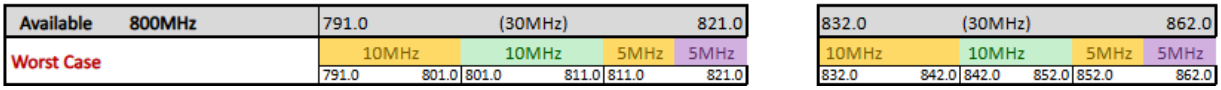


Sure is interested in increasing its holding in the 800MHz band from 10MHz of paired spectrum to 15MHz. This is because Sure would like to improve its island-wide 4G upload and download speeds for customers within buildings and in rural locations where site density is lower. We also believe that this additional 4G capacity will be required as Sure decommissions and switches off its 3G network in Jersey in 2025 and 2026 and a greater number of its customers migrate to using its 4G network for data services.

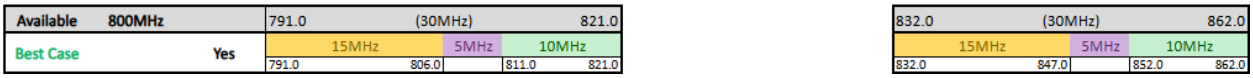
Whilst it would be most straightforward for Sure to simply apply/bid for an additional 5MHz paired spectrum[3] (see "Worst Case" diagram below), this approach would result in Sure, and potentially JT (if they are interested in also increasing their 800MHz spectrum allocation), having non-contiguous spectrum

[3] That is, within the 811 – 821MHz, and 852 – 862MHz ranges.

allocations in the 800MHz band. This is highly inefficient and minimises the benefits that can be derived from an increased spectrum allocation. Indeed, we believe that such a non-contiguous allocation would entirely negate the customer benefits that Sure is seeking to achieve by having more 800MHz spectrum. For example, to take advantage of this fragmented spectrum allocation, Sure would need to deploy multiple 800MHz compatible cells and/or would need to use carrier aggregation to deliver 4G services. Both approaches would result in increased licensing costs, power consumption and signalling overheads on Sure's 4G network, which in turn would likely result in those increased costs being passed on to the consumer. Additionally, non-contiguous, interleaved allocations of spectrum can make it more time-consuming, costly, and complex for Sure to manage and optimise its 4G network, which indirectly increases the cost of Sure's mobile network and therefore the cost to the consumer.



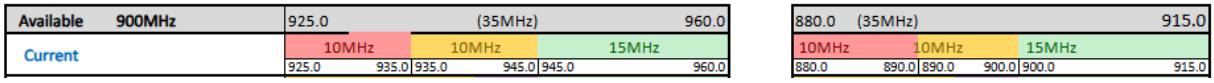
As a consequence, Sure proposes that the 800MHz band be re-farmed to facilitate for a more efficient allocation. Provided that JT is willing to engage in this re-farming process, and provided that there is no interest from third parties for 800MHz spectrum (which we consider to be unlikely), Sure proposes that JT be allocated 10MHz of paired spectrum at the top of the band (Airtel's previously licensed spectrum). This would subsequently free up 10MHz of paired spectrum in the middle of the band which would enable both Sure and JT to increase their allocations to 15MHz of <u>contiguous</u> paired spectrum. Alternatively, should JT not be interested in increasing its 800MHz allocation, it would enable Sure to obtain a contiguous 15MHz block, whilst also leaving 5MHz of paired spectrum available for another operator or use-case. Please see the "Best Case" diagram below for a summary of Sure's preferred allocations in the 800MHz band.



900MHz

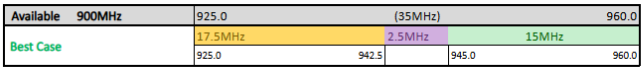
Sure is also interested in increasing its spectrum holdings in the 900MHz band. Specifically, Sure is interested in increasing its allocation from 10MHz of paired spectrum to 20MHz. However, we recognise that it may not be efficient or fair for Sure to be allocated some or all of Airtel's 900MHz allocation if there is competing demand from JT. We therefore believe that there are two credible options for how to best allocate Airtel's previously licensed spectrum.

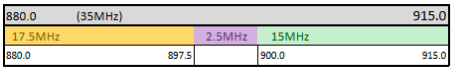
Airtel is currently holding 10MHz of paired spectrum in the 900MHz band. This allocation sits at the bottom of the band, with Sure and JT above it.



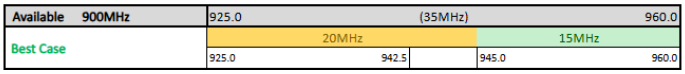
As explained above, Sure is interested in increasing its holding in the 900MHz band, ideally to 20MHz of paired spectrum. Should there be no other demand for this spectrum, then Sure would like to obtain the full 10MHz of paired spectrum previously licensed to Airtel, as per the diagram below ("Option 1").

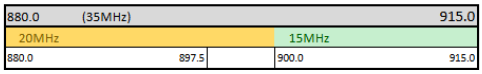
Alternatively, should there be demand from JT for spectrum in this band, then we propose that the 35MHz of paired spectrum be shared evenly between Sure and JT. This could be achieved by Sure relinquishing its licence for its existing 900MHz allocation and adopting Airtel's previously licensed spectrum. Once this reallocation has occurred, the 890 – 900MHz and 935 – 945 MHz ranges, which are currently allocated to Sure, could be split appropriately between Sure and JT to give each party an equal allocation (i.e. 7.5MHz to Sure and 2.5MHz to JT) ("Option 2").





In line with our rationale for requiring additional 800MHz spectrum, we believe there are good consumer benefit grounds for obtaining more 900MHz spectrum. Specifically, it will enable us to improve its island-wide 4G upload and download speeds for customers within buildings and in rural locations where site density is lower, and it will provide much needed additional 4G capacity as Sure decommissions and switches off its 3G network in Jersey in 2025 and 2026. We therefore propose that, subject to demand conditions, the JCRA should proceed with either Option 1 or Option 2 in allocating Airtel's previously licensed 900MHz spectrum.

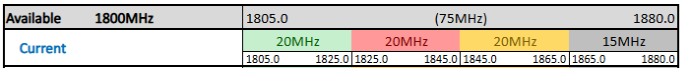


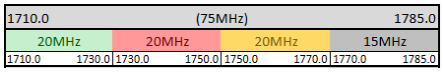


1800MHz

Sure is similarly interested in increasing its spectrum holdings in the 1800MHz band. Depending on demand conditions, this could involve increasing our spectrum holdings by obtaining some or all of Airtel's previously licensed 1800MHz spectrum, or by obtaining some or all of the unallocated spectrum in this band.

The 1800MHz band is currently occupied by Airtel, JT, and Sure, with each mobile network operator hold 20MHz of paired spectrum. Airtel is currently holding 20 MHz of paired spectrum within the 1730 – 1750MHz and 1825 – 1845MHz ranges, which sits in the middle of JT and Sure's allocations. There is additionally 15MHz of paired spectrum at the top of the band which is currently unallocated.



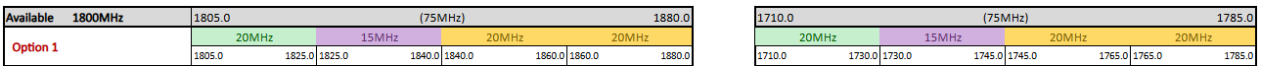


We are interested in increasing Sure's 1800MHz spectrum holdings from 20MHz of paired spectrum to either 35MHz or 40MHz (preferably the latter). This is because Sure's existing 2 x 20MHz allocation is

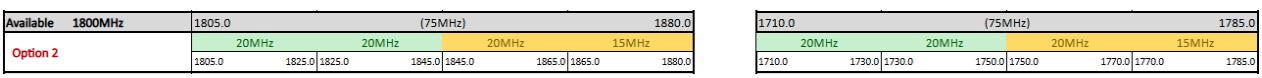
ultimately insufficient to be able to facilitate for, and provide good quality data services to, Sure customers once all Airtel customers have been migrated onto Sure's 4G mobile network. This issue is particularly acute in high density areas within Jersey, such as St Helier, St Clements, and St Brelades, where both Sure's and Airtel's 4G mobile networks (which have a combined 2 x 40MHz allocation) are already at capacity due to high data usage and limited spectrum availability. In the absence of additional spectrum, there is a substantial risk that Sure's existing 4G capacity will be insufficient to facilitate for its increased, post-merger customer base, resulting in reduced quality of service for Sure customers and therefore reduced competitiveness of Sure's mobile network.

In our view, Airtel's previously licensed spectrum and the unallocated spectrum in this band could be most efficiently allocated using one of three options.

Option 1 – this is Sure's preferred option for allocation of available ranges in the band. Under Option 1, and subject to there being no other specific demand from third parties, we propose that Sure additionally relinquishes its 20MHz of paired 1800MHz spectrum within the 1750 – 1770MHz and 1845 – 1865MHz ranges, and then re-apply for, and be reallocated, a new 40MHz paired block within the 1745 – 1785MHz and 1840 – 1880MHz ranges. This would result in a 15MHz paired block of spectrum becoming available in the middle of the band, as indicated in the diagram below, which could be allocated to JT or made available to a third party depending on demand. In our view, this would be the optimum use of spectrum in the 1800MHz band because it would enable Sure to obtain 40MHz of contiguous spectrum whilst also enabling JT, or another party, to have contiguous blocks of similar size.

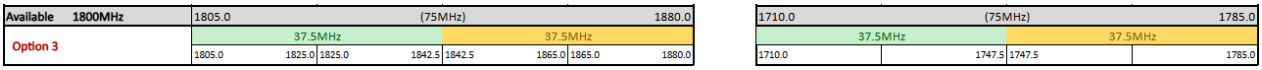


Option 2 – Alternatively, and on the assumption that JT is the only other interested party in 1800MHz spectrum (which we recognise may not be the case), a more straightforward approach would be for Sure to apply for the available 15MHz of paired spectrum at the top of the band and allow JT, should it wish to do so, to be allocated with the 20MHz relinquished by Airtel. Once again, this approach is preferred by Sure because it enables us to increase our spectrum holding for the benefit of consumers and our network, whilst also ensuring that all parties have similarly sized contiguous blocks of 1800MHz spectrum. Note, however, that Sure favours Option 1 due to ongoing capacity constraints on its network and in anticipation of Airtel's customers being migrated onto Sure's network.



Option 3 – this is our least preferred option. Option 3 would, provided there was no third party interest in this spectrum, see the entirety of the 1800MHz band be split between the two incumbent mobile network

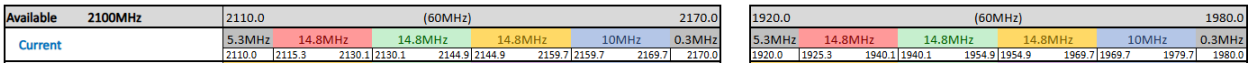
operators – Sure and JT. Whilst this option would see an equal division of the spectrum assets in this band, and therefore appear to be the most fair and efficient option, it is, in fact, the least efficient option of the three. Should 37.5MHz of paired spectrum be awarded to both Sure and JT, neither party would be able to fully utilise it. Specifically, 2.5MHz of the 37.5MHz paired spectrum would be unusable due to 3GPP standards preventing Sure and JT from deploying either 2.5MHz or 17.5MHz cells. As a result, both Sure and JT would have a redundant 2.5MHz block of paired spectrum which would remain unused. Therefore, despite Option 3 being viable on paper, we do not believe it is viable in practice and should not be implemented by the JCRA, even if demand conditions suit such an allocation.



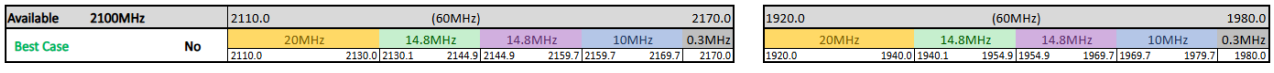
2100MHz

Finally, Sure is interested in increasing its spectrum allocation in the 2100MHz band. Specifically, we would like to increase our spectrum allocation from 14.8MHz of paired spectrum to 20MHz of paired spectrum. However, this is not possible unless some re-farming takes place, which we propose below.

The 2100MHz band is currently more congested than other spectrum bands in Jersey. Including Airtel, who will soon relinquish its spectrum, there are currently three mobile network operators and Clear Mobitel holding spectrum in this band. Additionally, there is a small amount of unallocated spectrum at either end of the band.



As above, Sure would like to increase its spectrum allocation to 20MHz. In order to do so, and on the assumption that no other party is interested in increasing their allocations, we believe that the most efficient and fair way to increase Sure's allocation would be for Sure to additionally relinquish its 2100MHz spectrum allocation within the 1954.9 – 1969.7MHz and 2144.9 – 2159.7MHz ranges, and instead be provided with the currently unallocated 1920 – 1925.3MHz and 2110 – 2115.3MHz ranges, along with Airtel's previously licensed spectrum within this band. This is outlined in the diagram below. In our view, this is the optimum approach as it enables Sure to obtain additional 2100MHz spectrum in a single contiguous block, whilst also freeing up spectrum in the middle of the band so that either JT and/or Clear Mobitel can also increase their allocations in a manner that maintains contiguousness.



As per our request for additional spectrum in the 1800MHz band, additional 2100MHz spectrum is needed to alleviate ongoing capacity constraints on Sure's 4G network and prepare the network to facilitate for a larger, post-merger customer base.
Question 11: Do you have any views or comments on the other spectrum matters listed in Section 6 of this Call for Information or any others that should form part of the Authority's spectrum strategy?
We support the JCRA's initial proposal for technology neutral licences in Jersey and the removal of technical conditions relating to 4G from licences. We look forward to engaging with the JCRA on this topic in 2025 and 2026.