



Draft Spectrum Strategy

Response to Call for Information and Draft Spectrum Strategy for
consultation

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1 Overview and summary

Introduction

- 1.1 This document is a Draft Spectrum Strategy issued by the Jersey Competition Regulatory Authority (the **JCRA**) to explain its provisional decisions on approaches to allocating and licensing several key local spectrum bands. It follows a Call for Information (**CFI**) issued for consultation in March 2025, which explained the background to these bands and asked for views and comments on options for approaching them.¹ Responses received have been assessed against an evidence-based framework of relevant facts, views and other inputs to develop this Draft Spectrum Strategy, which is being issued for consultation. After considering responses received, the JCRA plans to create and issue a final Spectrum Strategy in Q2 2026.
- 1.2 This section of the document provides a brief overview of the strategy development context and process (further information is available in the CFI), along with a summary of provisional decisions made by the JCRA. It also has the consultation questions asked to help shape the Final Spectrum Strategy. It contains the following subsections:
 - Background
 - CFI outcome
 - Key provisional decisions
 - Next steps

Background

- 1.3 Spectrum is the invisible radio waves used to connect wireless devices to the networks of wireless network providers and used for numerous services and applications including the use of mobile phones. It has a finite capacity, leading to access being carefully licensed and managed.
- 1.4 In Jersey, the UK communications regulator Ofcom is legally responsible for licensing and managing the Island's spectrum²—a role it fulfils in cooperation with the JCRA, which assesses local interest and demand before recommending an appropriate course of action. The JCRA has chosen to create a spectrum strategy covering several important local spectrum bands currently under consideration. Its purpose is to explain and establish the planned approach in the medium term, which will lead to making recommendations to Ofcom for spectrum licensing and management.
- 1.5 Under the Telecommunications (Jersey) Law 2002 (the **Law**), the JCRA has a broad primary duty to ensure Islanders and local organisations have access to the telecoms services needed to meet

¹ JCRA: T-105 Spectrum Strategy Call for Information – see [here](#) for more information.

² Under the Wireless Telegraphy Act 2006, extended by regulation to Jersey – see [here](#) for more information.

their interests. Creating a spectrum strategy supports this by helping ensure the best conditions for delivering medium-term expectations and requirements.

CFI outcome

1.6 The CFI issued in March 2024 was the first step in a planned three-stage approach to developing a spectrum strategy, as shown in Figure 1 below:



Figure 1: planned spectrum strategy stages

1.7 The CFI presented context and asked for responses to questions in four categories:

- i. **Spectrum policy guiding factors:** consideration of high-level principles to shape approach to policies;
- ii. **Spectrum focus 1:** consideration of bands below 3.8 GHz, which are currently licensed or intended for use with existing 2G, 3G, 4G and 5G services;
- iii. **Spectrum focus 2:** consideration of bands above 3.8 GHz, which include allocations being licensed at present for future 5G services in the UK and elsewhere; and
- iv. **Other spectrum matters:** consideration of other spectrum initiatives potentially of interest to Islanders.

1.8 There were four responses to the CFI, with non-confidential versions issued on the JCRA's website. The respondents are:

- Clear Mobitel (Jersey) Limited (**Clear**)
- Jersey Electricity Limited (**JE**)
- JT (Jersey) Limited (**JT**)
- Sure (Jersey) Limited (**Sure**)

1.9 The JCRA is grateful for all responses, which broadly support the development of a spectrum strategy while offering various views or proposals on the consultation questions. Based on an evidence-based analysis of these responses and drawing on other relevant market and industry data and inputs, the JCRA has developed this Draft Spectrum Strategy and is seeking views on the key provisional decisions it contains.

Key provisional decisions

1.10 Alongside the various conclusions outlined in this document, the JCRA has identified several provisional key decisions for which it is actively inviting feedback and public comment:

Provisional decision 1

The JCRA will make spectrum in the 2G/3G/4G bands being released following Sure's acquisition of Airtel available to existing licensed Full Service Network providers (JT and Sure) through a defined application and assessment process that seeks to maximise benefits for Islanders. The specific process arrangements and conditions will be issued alongside the Final Spectrum Strategy, but applicants will be expected to provide a business case that demonstrates benefits, to include commitments in the following areas:

- (a) Providing sustainable MVNO access to new or existing licenced telecoms providers;
- (b) Providing assured, measurable commitments to demonstrably improve service coverage and quality within the Island;
- (c) Illustrate how the allocation of additional spectrum can reduce the need for extensive physical network infrastructure, thereby limiting the proliferation of new masts.; and
- (d) Committing to return any subsequently unused spectrum for reallocation by the JCRA.

Applicants will further agree to cooperate in a structured and timely re-farming process aimed at efficiently reallocating currently licensed spectrum in the 2G/3G/4G bands between 800 MHz and 2600 MHz and agree to pay any reasonable fixed administrative costs associated with the application and re-farming processes.³

Provisional decision 2

The JCRA intends prioritising any historically unlicensed spectrum blocks between 800 MHz and 2600 MHz for use by existing Full Service Network providers, subject to an assessment of demand for its use by local utility companies (or similar organisations).

Provisional decision 3

The JCRA will not seek to proactively allocate any currently unlicensed spectrum in the 700 MHz or 3.4-3.8 GHz bands designated for use with 5G services in the short- to medium term, unless compelling demand arises before then.

³ Rather than use a potentially costly auction process to allocate local spectrum, the JCRA traditionally uses a comparative evaluation process and seeks to recover its administrative costs directly from applicants rather than use funds available from general telecoms licence fees.

Provisional decision 4

The JCRA will follow Ofcom's designation of the 3.8-4.2 GHz band and the 26 GHz and 40 GHz bands (mmWave band) as being used for 5G networks. No further work will be undertaken for these bands until clear evidence of demand is identified.

Next steps

- 1.11 This Draft Spectrum Strategy is being published for consultation. Feedback received through this process will be carefully considered to inform any necessary revisions before the final Spectrum Strategy is issued in Q2 2026, along with the implementation of related spectrum initiatives.
- 1.12 In particular, the JCRA would welcome views and comments to the questions below, with information on how to respond shown in Section 6 by the consultation closure date, which is 23 February 2026.

Question 1: Do you agree with the JCRA's proposed approach to frequency allocations below 3.8 GHz as set out in Provisional Decisions 1-3? If not, please explain why and propose any alternatives.

Question 2: Do you agree with the Authority's proposed approach to frequency allocations above 3.8 GHz as set out in Provisional Decision 4? If not, please explain why and propose any alternatives.

2 Spectrum policy guiding factors

2.1 The CFI identified and examined several high-level factors that will help shape the spectrum strategy. This section presents an analysis of the consultation responses received to questions posed about these principles along with other relevant evidence and the associated JCRA conclusions. It contains the following subsections:

- Guiding factor 1: the JCRA’s stated spectrum objectives
- Guiding factor 2: aligning with Ofcom policies and plans
- Guiding factor 3: aligning with Government policies and priorities
- Guiding factor 4: anticipating future demand for wireless services

Guiding factor 1: the JCRA’s stated spectrum objectives

Consultation focus

2.2 The CFI consultation asked for views on proposed updates to several overarching spectrum objectives historically developed by CICRA and revised by the JCRA.⁴

Summary of responses

- 2.3 There was broad agreement with the Authority’s proposed updated spectrum objectives, along with several comments on potential specific changes or enhancements.
- 2.4 JT proposed a change to Objective 1 from ‘To promote competition ...’ to ‘To promote sustainable competition...’, explaining that the JCRA should be mindful of the cost along with benefits of licensing spectrum.
- 2.5 JT further pointed to the proposed change removing an original CICRA reference to lessening the environmental impact of spectrum activities, stating that this commitment should be included in the updated spectrum objectives.

Analysis and JCRA conclusions

2.6 After considering JT’s comments and finding them relevant, the JCRA will amend its spectrum objectives to reflect (see Annex A: JCRA spectrum objectives).

Guiding factor 2: aligning with Ofcom policies and plans

Consultation focus

⁴ CICRA was the merged Guernsey and Jersey competition and regulatory authorities that existed between 2010 and 2020 when it was unwound and duties reverted to the Guernsey Competition and Regulatory Authority (GCRA) and the Jersey Competition Regulatory Authority (JCRA).

2.7 The consultation considered the option of pursuing a more localised approach to certain elements of spectrum management, rather than continue with one that is closely aligned to Ofcom.

Summary of responses

2.8 There was firm agreement that spectrum decisions affecting Jersey should retain a close alignment with Ofcom's UK policies and plans for spectrum designation.

Analysis and conclusions

2.9 The JCRA welcomes the consensus among respondents and will continue aligning local spectrum band designation and usage with that specified by Ofcom, unless there is a compelling reason against. However, the JCRA will also continue the existing arrangements of assessing interest and demand in key local bands before making spectrum licensing and management recommendations to Ofcom that include the allocation approach and any associated terms and conditions of access.

Guiding factor 3: aligning with Government policies and priorities

Consultation focus

2.10 Because of the Government of Jersey's (**GoJ**) important role in setting telecoms policy expectations and helping prioritise the development of associated regulations, the consultation included a framework of GoJ inputs for consideration in the development of a local spectrum strategy.

Summary of responses

2.11 Referring to the GoJ report cited in the CFI consultation, Clear reminded that it is more than seven-years-old with many of its recommendations now delivered and highlighted a section relating to network sharing as a means of efficiently using spectrum.

2.12 JE highlighted the importance stressed by GoJ in prioritising the needs of critical infrastructure providers within any future licensing and management of spectrum.

2.13 JT reiterates its earlier point on keeping the environmental impact of infrastructure proliferation in mind when making decisions, noting a policy principle within the Government's 2018 Spectrum Strategy encouraging network sharing. JT further highlights another policy principle referred to by GoJ, which is the coordination of spectrum between Jersey, Guernsey and the UK.

Analysis and conclusions

2.14 Considering comments on the published GoJ telecoms strategy, the JCRA recognises that GoJ will decide the timing of any future updates. In the meantime, the JCRA will work closely with GoJ to ensure strategic alignment where appropriate, including on matters relating to spectrum potentially required by critical infrastructure providers.

- 2.15 The JCRA has historically endorsed the concept of network sharing, aiming to reduce the overall deployment of radio network infrastructure. In May 2019, CICRA published a draft 5G statement of intent, proposing a framework for a single network in Jersey, with guaranteed access for mobile network operators (MNOs) via wholesale arrangements.⁵ However, following public consultation, the proposal was not adopted, as the majority of respondents opposed the idea. The JCRA later incorporated a network sharing clause into the relevant MNO licences, outlining provisions to be observed should operators choose to pursue such collaboration.⁶
- 2.16 The JCRA will aim to coordinate spectrum between Jersey and Guernsey, through engagement with the Guernsey Competition and Regulatory Authority (**GCRA**), and with the UK through engagement with Ofcom.

Guiding factor 4: anticipating future demand for wireless services

Consultation focus

- 2.17 Through this part of the CFI consultation, the JCRA hoped to gain insights from market participants—both existing and potentially new—on the likely future shape of the local wireless telecoms market. In particular, which wireless services will be present, what will drive the demand for them and which organisations will develop and operate the required networks.

Summary of responses

- 2.18 Clear urges the JCRA to ensure there is sufficient spectrum available to support emerging technologies, although without identifying examples or specific use cases.
- 2.19 JE anticipates a growing demand for spectrum supporting deployment of smart grid technologies, IoT (Internet of Things) devices and private 5G networks, highlighting the likelihood for Island-wide deployments of networks dedicated to applications operated by the utilities.
- 2.20 JT emphasises the need for enough spectrum to support data intensive services such as Enhanced Mobile Broadband (eMBB) and for private network applications for use with industries such as utilities, health, security, sensor network and fleet management sectors. JT further suggests that there is limited demand for Fixed Wireless Access (**FWA**) services, given the widespread local availability of fibre-to-the-premises.

Analysis and conclusions

- 2.21 The JCRA recognises the challenges involved in accurately predicting the future—especially at a time when new service deployment over 5G is not widespread and uncertainty exists over which ‘killer applications’ will drive take-up and revenues. Given this, the CFI consultation responses are understandably general rather than specific in this area, aside from a clear direction of travel

⁵ CICRA: 5G Spectrum Statement of Intent – see [here](#) for more information.

⁶ JCRA: Network Sharing Modifications to Class II Licences – see [here](#) for more information.

towards increasing transmission of data rather than voice or messaging and the continued use and enhancement of existing mobile broadband services.

2.22 Taking a more holistic view, therefore, the JCRA has defined three categories of potential wireless network that may operate in Jersey as a framework for anticipating future demand for local wireless services. These are shown in Table 1 below:

Category	Definition	Example services	Spectrum requirement
Full Service Network	An Island-wide wireless network providing services intended for general public use	Mobile services used by consumers and organisations	Typically requires substantial blocks of spectrum below 3.8 GHz to meet the demands of their customers
Limited Service Network	An Island-wide wireless network providing services designed for specific public or private use	Public FWA broadband, private equipment monitoring network	Could use spectrum below and above 3.8 GHz, with the ideal band and amount dependent on the service
Local Service Network	A geographically limited wireless network providing service intended for specific public or private use	Public campus-wide internet access, private hospital-wide medical network	Typically deployed in spectrum above 3.8 GHz in other jurisdictions, including the UK

Table 1: Categories of wireless network that may operate in Jersey

2.23 Taking the CFI consultation responses into account, along with a broader assessment based on evidence coming from other markets, expert opinion and relevant trends, the JCRA has used this framework when considering potential approaches to allocating and licensing the local spectrum under consideration in this spectrum strategy, which Section 3 explores in detail.

3 The approach to frequency allocations below 3.8 GHz

3.1 The CFI focused on potential approaches to a range of local frequencies below 3.8 GHz, which are currently licensed or intended for use with existing 2G, 3G, 4G and 5G services. This section presents an analysis of the CFI consultation responses received to questions posed about the approach to these frequencies along with other relevant evidence and the associated JCRA conclusions. It contains the following subsections:

- Proposed approach to currently licensed spectrum in the 2G/3G/4G bands being released following Sure's acquisition of Airtel
- Proposed approach to historically unlicensed allocations in 2G/3G/4G bands between 800 MHz and 2600 MHz
- Proposed approach to unlicensed allocations in the 700 MHz and 3.4-3.8 GHz bands

Proposed approach to currently unlicensed spectrum in the 2G/3G/4G bands being released following Sure's acquisition of Airtel

Consultation focus

3.2 The JCRA invited views and comments from anyone with specific interest in the spectrum allocations licenced to Airtel but which will become available for reallocation as a result of the Sure-Airtel merger.⁷

Summary of responses

- 3.3 Clear expresses a strong interest in any spectrum released by the Sure-Airtel merger (also noting access to former Airtel sites as being important).
- 3.4 Both JT and Sure advance arguments for reallocating the released Airtel spectrum to provide larger blocks for existing Full Service Network providers across the designated 2G/3G/4G bands. JT's proposed approach is to allocate all available spectrum, whereas Sure would leave a limited amount of unallocated spectrum for other possible providers.
- 3.5 While JT indicates this division of released spectrum would help relieve congestion in the 800 MHz 4G band alongside other broad improvements in network quality and performance, JT also asserts there is a trend towards fewer MNOs in a jurisdiction and highlights increased operational costs associated with shorter investment cycles and the need to accommodate telecoms security requirements.
- 3.6 Sure, on the other hand, focuses on the potential customer benefits that can be realised through receiving additional spectrum, which will relieve congestion and improve data throughput quality.

⁷ In 2024, Sure acquired Jersey Airtel Limited after commitment to certain legally binding conditions made under the Competition Law – see [here](#) for more information.

Sure also notes additional spectrum will help maintain service quality following the migration of former Airtel customers onto the Sure network.

JCRA analysis and conclusions

- 3.7 The JCRA recognises this is an important strategic issue and pivotal decision. On one hand, there is an approach that prioritises allocating this spectrum for a potential third Full Service Network provider, which leaves open the opportunity to restore the level of competition existing before the Sure-Airtel acquisition. On the other is prioritising allocating some or all of this spectrum between the remaining Full Service providers, which has the potential to benefit Islanders through improved coverage and quality, and through reducing infrastructure proliferation.
- 3.8 As well as aligning with Clear's consultation response, the approach of allocating this spectrum for a potential new market entrant preserves the longstanding position of having three Full Service Network providers in Jersey. Given the Island's affluent, high-profile status, presuming there will be interest in replacing Airtel may be a reasonable position to take. Balanced against this is that there was no new interest expressed through the CFI consultation along with evidence of national and global trends towards network provider consolidation rather than expansion. Furthermore, the local market is fundamentally different from when Airtel entered: prospects for growth are limited and there will be competition from a new MVNO.⁸
- 3.9 Turning to the potential approach of allocating some or all of this spectrum to JT and Sure, this aligns with their consultation responses but would effectively close the local market to a new Full Service Network provider. However, this would place Jersey in the same position as many comparably-sized jurisdictions which only have two mobile network providers—such as the Isle of Man. It should also offer the prospect of improved coverage, quality and reduced infrastructure proliferation, which would be a positive outcome for Islanders. It should also ensure key spectrum bands are fully rather than partially used and allow JT and Sure to minimise expensive cell densification as demand for mobile data capacity grows.⁹
- 3.10 Considering improved coverage and quality, the JCRA firmly believes these are important factors for Islanders and local organisations, many of which rely strongly on their mobile devices for telecommunications (including accessing the emergency services), information from and interactions with online applications and services, and tools essential for work and leisure. While accepting the Island is well-served by existing mobile networks, making additional spectrum available to JT and Sure should provide the opportunity to reduce areas of lower coverage (including inside buildings) and increase quality to ensure high bandwidth connections are as widely available as possible.

⁸ An Upfront MVNO remedy was a condition of Sure's acquisition of Airtel, leading to the CI Co-operative Society planning to launch an MVNO service in Jersey and Guernsey.

⁹ Cell densification refers to increasing the number of cellular base stations or access points within a specific geographic area to improve network capacity, coverage and performance.

- 3.11 Considering reduced infrastructure proliferation, this aligns with a GoJ input to the CFI to consider the need to protect Jersey’s natural environment through minimising the impact of telecom infrastructure such as masts (while ensuring efficient new network rollout or upgrades).¹⁰ Providing JT and Sure with additional spectrum should provide the opportunity to reduce network densification through increasing capacity on existing or new cells.
- 3.12 The JCRA also strongly notes that the development of an MVNO or MVNOs—which do not require spectrum—has the potential to balance the loss of network-based competition through enabling the continuation of retail-based competition. This scenario not only preserves competitive benefits for Islanders, but should also reduce the need for duplicative network investment in a small Island, including potentially intrusive radio network infrastructure. For existing Full Service Network providers, it further creates opportunities to recoup network investment costs without needing to expand potentially costly retail activities.
- 3.13 Both approaches outlined above offer valuable advantages, though also each carries a degree of uncertainty. While there is the potential for a new Full Service Network provider resulting in new services and lower costs, there is no guarantee one will ever materialise, leaving valuable spectrum unused. While the promise exists of improved coverage, quality and reduced infrastructure proliferation through allocating the spectrum to existing Full Service Network providers, circumstances may mean that Islanders do not experience any significant benefits.
- 3.14 Weighing up both these options, the JCRA believes that on balance, it is unlikely that a third Full Service Network provider will seek to enter the local market—not in the short- to medium-term at least. There has been no interest expressed, either through the CFI consultation or historically, and evidence demonstrates the trend is towards consolidation rather than expansion.¹¹ The JCRA also takes strong account of the Co-op’s plans to launch an MVNO service, which promises to encourage innovation and competition for the benefit of Islanders.
- 3.15 The JCRA further accepts that allocating spectrum in the 2G/3G/4G bands being released following Sure’s acquisition of Airtel to the existing Full Service Network providers has the potential to benefit Islanders through improved coverage, quality and reduced obtrusive infrastructure proliferation leading to lower power consumption and less omissions. What is important from a regulatory perspective is that these potential competitive, service and environmental benefits materialise for Islanders.
- 3.16 To ensure these regulatory expectations are met, the JCRA believes that a structured, merits-based approach should be adopted for any spectrum reallocation process. This would require existing Full Service Network providers to submit a defined formal application for any local 2G/3G/4G spectrum made available by the JCRA. This application would form the basis of a

¹⁰ JCRA: T-105 spectrum strategy Call for information, p13 – see [here](#) for more information.

¹¹ The UK market is a good example of this trend, with a merger between Vodafone and Three leading to a reduction from four equivalent Full Service Network providers to three, with available 2G/3G/4G spectrum allocated among them.

business case explaining the competitive, service and environmental benefits expected to arise for Islanders through the provider gaining additional spectrum.

- 3.17 The JCRA supports the views expressed by JT and Sure that any reallocation process should include consideration of existing spectrum allocations to ensure the most efficient and effective local arrangements. To achieve this, the JCRA proposes including a commitment within any application process to cooperate in a structured and timely process to re-farm currently licensed spectrum in the 2G/3G/4G bands between 800 MHz and 2600 MHz. Overseen by the JCRA with Ofcom's involvement and support, this process will seek to ensure the optimum allocation of available spectrum between Full Network Service providers.
- 3.18 The JCRA also believes it reasonable to recover justifiable administrative costs associated with the application and reallocation processes and to further ensure that spectrum that has been licensed to a Full Service Network provider but not used can be recovered in a straightforward fashion for potential reallocation.

Provisional decision 1

The JCRA will make spectrum in the 2G/3G/4G bands being released following Sure's acquisition of Airtel available to existing licensed Full Service Network providers (JT and Sure) through a defined application and assessment process that seeks to maximise benefits for Islanders. The specific process arrangements and conditions will be issued alongside the Final Spectrum Strategy, but applicants will be expected to provide a business case that demonstrates benefits, to include commitments in the following areas:

- (a) Providing sustainable MVNO access to new or existing licenced telecoms providers;
- (b) Providing assured, measurable commitments to demonstrably improve service coverage and quality within the Island;
- (c) Illustrate how the allocation of additional spectrum can reduce the need for extensive physical network infrastructure, thereby limiting the proliferation of new masts; and
- (d) Committing to return any subsequently unused spectrum for reallocation by the JCRA.

Applicants will further agree to cooperate in a structured and timely re-farming process aimed at efficiently reallocating currently licensed spectrum in the 2G/3G/4G bands between 800 MHz and 2600 MHz and agree to pay any reasonable fixed administrative costs associated with the application and re-farming processes.¹²

¹² Rather than use a potentially costly auction process to allocate local spectrum, the JCRA traditionally uses a comparative evaluation process and seeks to recover its administrative costs directly from applicants rather than use funds available from general telecoms licence fees.

Proposed approach to historically unlicensed blocks in 2G/3G/4G bands between 800 MHz and 2600 MHz

Consultation focus

3.19 The CFI explained there are a range of unlicensed blocks in bands between 800 MHz and 2600 MHz, which is part of the range historically designated for providing 2G/3G/4G services. It invited expressions of interest in these blocks or views or comments on a future regulatory approach.

Summary of responses

3.20 All respondents expressed interest in this spectrum, with Clear and JE primarily seeing it for use with new services while JT and Sure focused on the opportunity to improve network capacity.

JCRA analysis and conclusions

3.21 The JCRA welcomes interest in these historically unlicensed spectrum blocks and maintains that their allocation and use should, wherever possible, serve the interests of Islanders. Leaving them unused is inefficient, especially in view of interest expressed through the CFI consultation.

3.22 Considering the proposals of JT and Sure to prioritise allocating some or all of these blocks among existing Full Service Network providers, the JCRA believes this aligns with the approach taken by Ofcom in the UK, where there is a focus on providing spectrum capacity to support customer demand. The outcome of Provisional Decision 1 also supports this approach, presenting an opportunity to consider all 2G/3G/4G spectrum in the round, and ensure it is all efficiently allocated through a focused refarming and allocation process.¹³

3.23 On the other hand, there is interest in these historically unlicensed spectrum blocks from potentially new Limited Service Network providers—Clear and JE. Lower frequency spectrum allocations are attractive to network providers because they offer wider coverage and better in-building penetration qualities. This could be particularly important to a utility company, allowing connection to its devices located inside properties or within service infrastructure. However, the JCRA notes that other spectrum bands could equally be used by public Limited Service Network providers for FWA services, such as allocations in the 3.4-3.8 GHz and 3.8-4.2 GHz bands. Further, the JCRA is aware that Ofcom is considering several potential spectrum bands for use by utilities in the UK, including blocks within the 800/900 MHz and 1900 MHz. Once settled, and following the strategic principle of alignment with Ofcom, the JCRA expects these blocks to be available for local utility use if required.

3.24 On balance, the JCRA takes strong account that these historically unlicensed blocks are within frequency bands associated with 2G/3G/4G services, which are prioritised for equivalent Full Service Network providers in the UK. Further, that considering them for allocation within the proposed 2G/3G/4G refarming process has the potential to ensure they are most efficiently used

¹³ Refarming spectrum refers to the process of reallocating or repurposing existing radio frequency spectrum bands.

in future. However, the JCRA also takes account of the interest expressed by JE, and the potential this extends to other local utility providers, such as Jersey Water and believes it important to fully understand this before finalising the approach to these historically unlicensed blocks.

Provisional decision 2

The JCRA intends prioritising any historically unlicensed spectrum blocks between 800 MHz and 2600 MHz for use by existing Full Service Network providers, subject to an assessment of demand for its use by local utility companies (or similar organisations).

Proposed approach to unlicensed allocations in the 700 MHz and 3.4-3.8 GHz bands

Consultation focus

3.25 In the UK, Ofcom designated the 700 MHz and 3.4-3.8 GHz bands for use by MNOs providing 5G services. Aligned with this, the JCRA defined three Full Service Network spectrum packages and multiple Limited Service Network spectrum packages and offered them through a structured application process in 2022.¹⁴ This resulted in two Full Service Network spectrum packages licensed to JT and Sure, but left the remaining spectrum unallocated.

3.26 The CFI consultation sought views on how to approach currently unallocated spectrum blocks in the 700 MHz and 3.4-3.8 GHz bands, which remain designated for use with 5G services.

Summary of responses

3.27 Clear and JE expressed interest in the currently unallocated 5G spectrum, with JE citing it for use with private 5G networks. Sure is generally not interested other than in an opportunity to obtain more 700 MHz spectrum if available, which could be used to improve capacity in rural areas.

3.28 JT advanced a case for splitting the 3.4-3.8 GHz band between itself and Sure, stressing the limitations caused by not having enough spectrum to support high quality 5G services.

JCRA analysis and conclusions

3.29 The JCRA welcomes the recent and planned launch of 5G services in the Island, made possible through considerable investment by existing Full Service providers following the 2022 5G Spectrum Award. By its nature, 5G requires considerable amounts of spectrum to meet both customer expectations for continually improving mobile broadband services and to deliver new advanced wireless services such as private networks for a variety of public and commercial applications.

3.30 Taking this spectrum demand into account, the JCRA appreciates there may be merit in providing more 700 MHz and 3.4-3.8 GHz spectrum beyond the initial allocations already licensed to existing

¹⁴ JCRA: 5G Spectrum Award (2022) – see [here](#) for more information.

Full Service Network providers.¹⁵ However, it also notes that the first 5G network has only recently become live in Jersey and that new use cases are yet to fully emerge in comparable jurisdictions.

3.31 Considering the interest shown by Clear and JE, the JCRA notes this is provisional rather than a definite demand and that it could also be met through spectrum allocations in the currently unused 3.8-4.2 GHz band.

3.32 A final consideration is that the remaining Full Service Network spectrum package creates an opportunity for a new provider to enter the local market at a future point. While Provisional Decision 1 (see above) means they would lack access to important 2G/3G/4G bands, further development of 5G Standalone technologies¹⁶ could permit viable new services.

3.33 On balance, the JCRA believes that demand for the currently unallocated 5G designated spectrum blocks is questionable at present, but may develop in the medium-term. It is preferable, therefore, to devote regulatory resources to other spectrum priorities in the short-term.

Provisional decision 3

The JCRA will not seek to proactively allocate any currently unlicensed spectrum in the 700 MHz or 3.4-3.8 GHz bands designated for use with 5G services in the short- to medium term, unless compelling demand arises before then.

Consultation questions

3.34 The JCRA welcomes responses to the following question:

Question 1: Do you agree with the JCRA's proposed approach to frequency allocations below 3.8 GHz as set out in Provisional Decisions 1-3? If not, please explain why and propose any alternatives.

¹⁵ The 3.4-3.8 GHz spectrum allocations licensed to JT and Sure in 2022 are for 100 MHz contiguous allocations, but with an initial cap of 40 MHz while a spectrum defragmentation process takes place – see [here](#) for more information.

¹⁶ Standalone 5G (5G SA) is a next-generation mobile network architecture that operates entirely on a dedicated 5G core, independent of legacy infrastructure.

4 The approach to frequency allocations above 3.8 GHz

4.1 The CFI focused on potential approaches to a range of specific frequencies above 3.8 GHz, which Ofcom are licensing or planning to license in the UK for new 5G networks. This section presents an analysis of the consultation responses received to questions posed about the local approach to these frequencies. It contains the following subsections:

- Approach to allocating and licensing the 3.8-4.2 GHz band and mmWave band
- Consultation questions

Approach to allocating and licensing the 3.8-4.2 GHz band and mmWave band

Consultation focus

4.2 These two bands are being licensed in the UK for use with 5G services. The former is being made available as a 'shared access band', allowing MNOs to apply for licences covering a limited geographical footprint. The latter, which encompasses the 26 GHz and 40 GHz bands, is proposed for use with ultra-high capacity applications such as in sports stadiums. The CFI sought views on the approach the JCRA should take to these bands in Jersey.

Summary of responses

- 4.3 While there was broad support for adopting Ofcom's shared access licensing approach for local spectrum in the 3.8–4.2 GHz band, Sure and JT expressed the view that implementation should be deferred to a later time. Sure expanded its position with detailed information on the current limited level of demand and a preference to focus on deploying and initially using the 3.4-3.8 GHz band.
- 4.4 There was broad support for adopting the UK approach to designating the 26 GHz and 40 GHz spectrum allocations as the 5G mmWave band, but caution expressed over potential local deployment given the Island's size and population.

JCRA analysis and conclusions

- 4.5 The JCRA appreciates the responses received to these consultation questions and acknowledges the views and information shared.
- 4.6 Considering the local approach to opening up the 3.8-4.2 GHz band in Jersey, the JCRA notes the low level of interest or demand from existing licensed mobile providers at the current time, and non-specific interest and demand from a limited number of potential new market entrants. It is questionable whether this situation will change in future, given factors that may constrain demand compared to the UK. These include universal fibre-to-the-premises and near ubiquitous mobile coverage, the comparably smaller size of local commercial and public organisations and that existing Full Service providers will target likely use case for private 5G networks in the Island.
- 4.7 Given the low level of demand, the JCRA does not intend considering the potential approach to opening up the 3.8-4.2 GHz band in Jersey at the present time, but return to this when clear evidence of demand emerges.

4.8 Considering the mmWave band, the JCRA reiterates its provisional view remains to designate the 26 GHz and 40 GHz bands as the 5G High-band and make them available for licensing in Jersey at some future date. Based on responses received and further evidence-based analysis, this will be a longer-term activity.

Provisional Decision 4

The JCRA will follow Ofcom's designation of the 3.8-4.2 GHz band and the 26 GHz and 40 GHz bands (mmWave band) as being used for 5G. No further work will be undertaken for these bands until clear evidence of demand is identified.

Consultation questions

4.9 The JCRA welcomes responses to the following question:

Question 2: Do you agree with the JCRA's planned approach to frequency allocations above 3.8 GHz as set out in Provisional Decision 4? If not, please explain why and propose any alternatives.

5 Other spectrum matters

5.1 The CFI included a section on related spectrum points and initiatives that the JCRA could consider in the context of a spectrum strategy or prioritise for later examination. This section presents an analysis of the consultation responses received to questions posed about this area along with an assessment of other relevant evidence, and the associated JCRA conclusions. It contains the following subsections:

- Analysis of responses

Analysis of responses

Consultation focus

5.2 The consultation listed a wide range of spectrum-related initiatives being pursued or debated locally or in the UK (and more generally in other jurisdictions). The intention was to understand views on whether the JCRA should prioritise any of these for attention in the short term, and which should be more closely monitored for potential future regulatory activity.

Summary of responses

5.3 Respondents offered a wide range of views and comments, which are summarised in Table 2 below.

2G/3G switch-off	JT noted plans to switch off its 3G network by the end of 2025, with 2G likely to continue in operation until the 2030s.
Removing technical conditions from certain spectrum licences	There was broad support for removing technical conditions from certain spectrum licences.
Review telecoms licence conditions relating to 4G	JT supported reviewing licence conditions relating to 4G obligations, noting they became less important as markets mature.
Drone licensing	JE supported the extension of Ofcom's drone licencing regime to Jersey, noting the utility industry's increasing use of drones. Clear and JT noted a general interest.
Spectrum for utilities	While JE endorsed the principle of dedicated spectrum for utilities, Clear and JT considered public networks could best deliver this need.

Spectrum for general satellite services	There were mixed views on the role of satellite services in Jersey, with support from JE as a means of increasing remote monitoring capabilities, and a suggestion from Clear to continue watching developments in the area. JT made a specific request around assurances about how direct satellite-to-handset development will impact on local telecoms providers.
Regulatory framework for direct satellite-to-handset connectivity	
Plans to auction spectrum in the upper 1.4 GHz band	There was no specific interest in this band, with views from Clear and JT that developments should be monitored.
Proposals to allow dual technology access in the 6 GHz band	There was no specific interest in the band, but views advanced on potential future use and the need to monitor developments.

Table 2. Summary of responses to other spectrum matters

JCRA analysis and conclusions

- 5.4 The JCRA welcomes and notes comments and views provided on this wide-ranging section of the CFI consultation. Because the identified spectrum-related issues are generally complex, and require individual attention to understand and appreciate any potential impacts on Jersey—both positive and negative—the intention was to develop a general regulatory position at this time.
- 5.5 Considering the 2G/3G switch-off, the JCRA will continue monitoring and supporting the initiative currently led by GoJ and being implemented or planned by JT and Sure.¹⁷ The JCRA also notes that an initiative to remove technical conditions from certain spectrum licences is already progressing.
- 5.6 Taking account of comments associated with reviewing the current conditions relating to 4G contained in certain licences, the JCRA proposes to carry this out alongside provisional plans for refarming and allocating 2G/3G/4G spectrum, as stated in Provisional Decision 1.
- 5.7 Having concluded some provisional work to understand the approach to drone licensing in the UK and how Ofcom could extend its licensing regime to the Island, the JCRA will monitor any development of local high-power drone usage for commercial purposes, and consider addressing regulatory requirements if there is demand.
- 5.8 Considering spectrum for utilities, the JCRA will monitor Ofcom’s activities in this area to understand how any decisions on UK spectrum allocations can be implemented in Jersey—if necessary.
- 5.9 The JCRA will continue actively monitoring spectrum developments relating to satellite services, including the emergence of direct-to-handset licensing frameworks, but not carry out any proactive regulatory activities in the short-term.

¹⁷ The first stage is switching off 3G networks, with plans to maintain 2G networks until the early 2030s.

6 Next steps

6.1 This section defines the planned next steps in developing a spectrum strategy. It contains the following subsections:

- Timetable
- Responding to the Draft Spectrum Consultation

Timetable

6.2 As noted in Section 2 above, this CFI is part of a process being carried out to create a spectrum strategy for Jersey. The structure and timetable—which is subject to change—for this is:

Jan 2026 Issue Draft Spectrum Strategy for consultation

Feb 2026 Close Draft Spectrum Strategy consultation and consider responses received

Q2 2026 Issue Spectrum Strategy and begin any specific spectrum allocation and licensing activities arising as an outcome

Responding to the Draft Spectrum Strategy consultation

6.3 The JCRA invites written views and comments on the issues and questions raised in this Draft Spectrum Strategy consultation. All responses to this proposal should be submitted in writing, clearly marked ‘T-105 Spectrum Strategy’, and received by the JCRA before 5.00 pm on 23 February 2026. Submissions can be sent by email to info@jcra.je or alternatively in writing to:

Jersey Competition Regulatory Authority
2nd Floor Salisbury House
1-9 Union Street
St Helier
Jersey
JE2 3RF

6.4 It would be helpful if any response includes direct answers to the questions asked in this document. It would also help if you can explain why you hold your views and how the JCRA proposals would impact on you, supported by any quantitative or qualitative evidence that you possess.

Question 1: Do you agree with the JCRA’s proposed approach to frequency allocations below 3.8 GHz as set out in Provisional Decisions 1-3? If not, please explain why and propose any alternatives.

Question 2: Do you agree with the JCRA’s proposed approach to frequency allocations above 3.8 GHz as set out in Provisional Decision 4? If not, please explain why and propose any alternatives.

Annex A: JCRA spectrum objectives

Ref	New JCRA spectrum objective
1	To promote sustainable competition as a mechanism to further its consumer, market, economic and environmental interest objectives
2	To create value for Jersey through focus on the short- and long-term interests of consumers and organisations, having regard to prices and costs, and the availability and range of services suitable to different local needs.
3	To seek to ensure the processes and criteria adopted by the JCRA are consistent with Ofcom's duties, including the duty to secure the optimal use of wireless telegraphy of the electromagnetic spectrum.
4	Work with Guernsey where possible for economic benefits and to prevent harmful interference through aligning spectrum licencing across the Channel Islands.