

power to you

Jersey Competition Regulatory Authority, 2nd Floor, Salisbury House, Union Street, St Helier, Jersey, JE2 3RF.

08 August 2012

For the attention of Andrew Riseley - Executive Director

Dear Sir.

<u>Jersey Airtel Limited response to Initial Notice Document Proposed direction to JT (Jersey) Ltd – Document No:</u> <u>CICRA 12/37</u>

With reference to the Jersey Competition and Regulatory Authority's (JCRA) initial notice document dated 26 July 2012 outlining the JCRA's proposal to issue a direction to JT under Condition 33.2 of JT's licence with regards to Wholesale on-island leased line services provided by JT being priced at no more than the retail price charged by JT for the same service minus 20% with the direction deemed to take effect as from 1 April 2012, Jersey Airtel Ltd (JAL) are pleased to be able to provide their comments:

JAL appreciates that the JCRA's proposal for capping the wholesale on-island leased lines services provided by JT at a level of JT's retail price minus 20% from the current retail level minus 9%. However JAL would like to request the JCRA to review this margin even further & propose a level of JT's wholesale price be a minimum of retail price minus 40% - 60% deemed to take effect as from 1st April 2012.

Here is comparison of prices between Jersey and Guernsey,

	Guernsey Prices of 1xE1 (per month)	Jersey Prices of 1xE1 (per month) after 20% discount as proposed by JCRA (inc GST)	Jersey Prices of 1xE1 (per month) after 40% discount (inc GST)
On-Island (same exchange)	£107	£237	£178
On-Island (different exchange)	£193	£237	£178

We trust that JAL's response is of assistance and please do not hesitate to contact me should you have any further questions relating to our response.

Yours sincerely

Ms. Lisa Moyse

Head - Roaming & Regulatory Affairs

Jersey Airtel Limited