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

30th June 2009

For the attention of Mr Graeme Marett – Case Officer

Dear Graeme,

“Expression of Interest in 2600 MHz Spectrum” – Jersey Airtel Limited Response

With reference to the Consultation Paper 2009-10 published by the JCRA requesting expressions of interest to the potential licencing of 2.6GHz spectrum within Jersey, Jersey Airtel Limited (JAL) would like to register an interest in acquiring an allocation of the available 2.6GHz spectrum.

JAL accept that on a world-wide basis there has been consideration for utilizing the 2.6Ghz spectrum band for both WiMAX and the LTE evolution of 3G and 4G mobile technologies.

As the leading provider of mobile 3G broadband services within Jersey, JAL is focused and committed to evolving the application of mobile broadband technologies to further enhance the delivery of advanced mobile broadband products, services and applications. Currently, JAL’s technology strategy is considering both the future implementation of LTE and WiMAX related technologies. Our parent company, Bharti Telecom, has extensive experience of implementing WiMAX technology and networks in the Indian market; and our partner, Vodafone, is currently trialing LTE services in the USA which are expected to be completed by the end of 2009.

JAL has already demonstrated that its mobile 3G broadband services are a highly effective alternative to conventional wireline broadband products in terms of speed, bandwidth, coverage, quality, flexibility and price. This is proven in the strong demand that JAL has already created for mobile 3G broadband services with Jersey consumers. Consequently, JAL would consider utilising a potential allocation of the 2.6GHz spectrum for enhancing the delivery of leading edge ultra-high speed mobile broadband services to the Jersey market place to further increase download/ upload speeds, latency and network capacity.

The continuing and rapid evolution of increasingly bandwidth demanding consumer and business applications means that Jersey’s telecoms providers must continue to develop and invest in both existing and emerging broadband

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technologies to meet the increasing demands of Jersey consumers and businesses and to ensure the Jersey economy is kept at the forefront of the global internet/ e-business community. JAL firmly believes that both the evolving LTE and WiMAX standards and corresponding vendor product roadmaps could enable JAL to deliver a significant increase in broadband speed and capacity which are necessary to support leading edge services, such as mobile TV , video conferencing, real-time/ interactive e-gaming etc.

Figure 1 overleaf, shows the impact of evolving consumer/ business applications and their corresponding demand for increased bandwidth

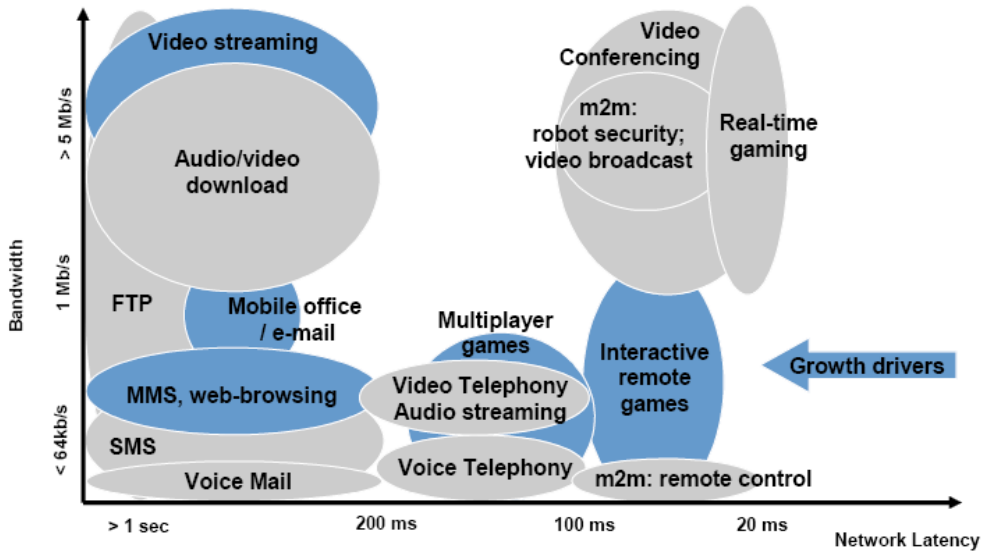


Figure 1 – Impact on Network Bandwidth and Latency of evolving consumer and business applications

Figure 2 overleaf – predicts how 4G HSDPA and 4G LTE technologies will meet the likely growth in Uplink and Downlink speeds over the next 4 years. Figure 2 shows that the evolution of existing HSDPA 3.5G technologies similar to those currently deployed by JAL should be able to support Downlink speeds of upto 20Mbps and Uplink speeds of around 10Mbps, which should be sufficient to meet demand over the next 2 years or so. Above these speeds, we believe that the implementation of 4G related technologies will be key to provide and deliver the ultra-high speed services demanded by the Jersey consumer and marketplace. Current predictions indicate that 4G (LTE or WiMAX) related technologies will both evolve to deliver Downlink speeds in excess of 100Mbps and Uplink speeds of in excess of 20Mbps.

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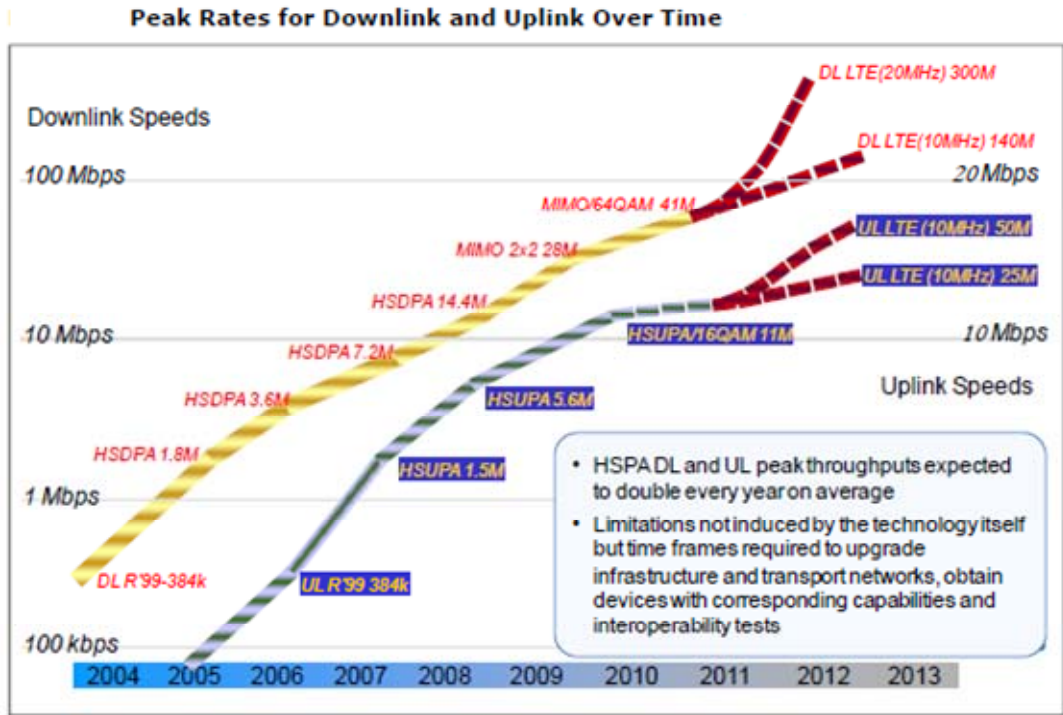


Figure 2 – Predicted growth in Uplink and Downlink speeds

Figure 3 shows the predicted timelines for the evolution of both LTE and WiMAX technologies towards the delivery of ultra-high bandwidth 4G services.

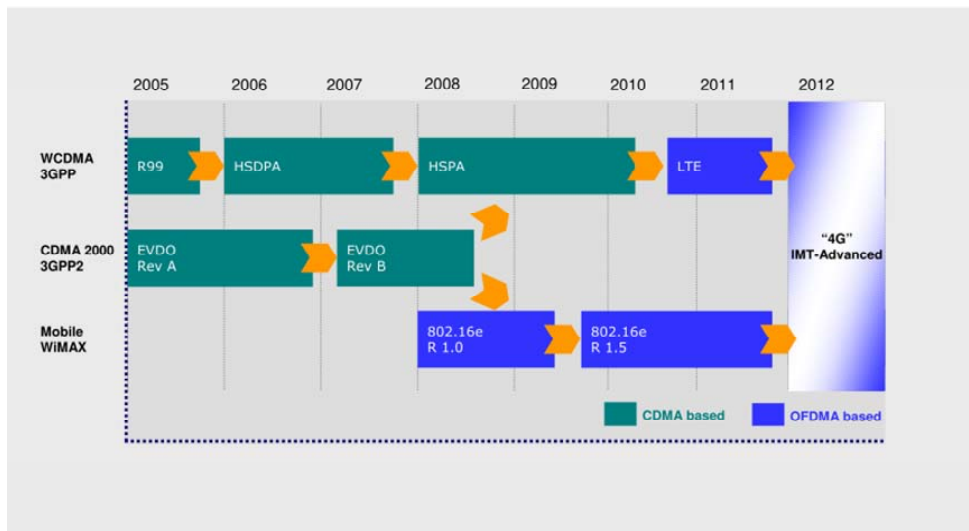


Figure 3 – LTE and WiMAX 4G evolution roadmap

Potential LTE or WiMAX 4G deployment differs from the GSM and UMTS infrastructure currently deployed in JAL's network since we understand that LTE or WiMAX related technologies could potentially use different base station equipment and could require enhanced transmission backhaul arrangements. JAL believes that LTE or WiMAX 4G related technologies



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could be largely integrated within its existing network, however since the delivery of future LTE or WiMAX 4G related services in Jersey could be via the allocation of the higher 2.6GHz spectrum, compared to the 2.1GHz spectrum currently used by JAL for 3G/UMTS, then achievement of full island-wide coverage may require further sites or network expansion, due to the relationship between frequency and coverage.

JAL would require a minimum 2x20 MHz (20MHz in Downlink and 20MHz in Uplink) of the 2.6GHz spectrum to be able to deliver an effective LTE or WiMAX based 4G ultra-high speed broadband service across Jersey.

JAL is aware of the potential interference issues between the use of 2.6Hz spectrum for telecommunications applications and existing RADAR applications. JAL understands that this is subject detailed assessment by regulatory authorities and equipment vendors. JAL also understands that various approaches to telecoms network/ RADAR performance optimization and interference management are being considered and JAL will be pleased to comment further on this matter, once the regulatory assessment has progressed further and network vendors have updated their views accordingly.

JAL's strategic network vendors are indicating that suitable LTE or WiMAX network equipment will not be launched to the market for another 12 months or so. JAL would then propose to run a 4G trial in Jersey for 12 months and implementation into JAL's network is likely to take around a further 6 months to complete. Thus, JAL would plan to launch a LTE or WiMAX based 4G ultra-high speed broadband service in the Jersey market place within the next 24 – 36 months.

JAL's medium and long-term business, product and technology strategy is driven by the imperative to ensure JAL can meet and exceed the likely evolving bandwidth demands from Jersey consumers. Initially, JAL plans to evolve its existing 3.5G HSDPA network increasing bandwidth upto 14.4 MBps download and 5.6 MBps in line with the evolving HSDPA product roadmap delivery from its network vendors. In the meantime, as discussed above, JAL will be evaluating both LTE and WiMAX technologies to determine the most suitable approach for delivery of ultra-high speed bandwidth 4G services for the medium/ long-terms. Clearly, delivery of 4G services will be dependent on the allocation of appropriate spectrum. The investment required for both the assessment and deployment of 4G services has been factored into our existing business plans and we are confident that 4G technologies can be integrated into our existing network and operational infrastructure but there may be a requirement for some additional sites to provide the necessary coverage.

We trust our response and comments meet with your approval and we look forward to having the opportunity to actively contribute in the further stages of the allocation of 2.6Ghz spectrum in Jersey.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'James Wild', with a horizontal line underneath.

James Wild  
Head of Regulatory Affairs – Channel Islands  
Jersey Airtel Limited