

Daniel Vincent  
JCRA  
2<sup>nd</sup> Floor  
Salisbury House  
1-9 Union Street  
St Helier  
Jersey  
JE2 3RF

Dear Daniel

### Fixed Interconnection Rates in Jersey

Please accept this letter as our formal, confidential submission to your consultation on Fixed Interconnection Rates in Jersey. I have addressed each element of your proposed direction in turn;

- The rate charged by JT for call origination on its public telephone network provided at a fixed location in Jersey (“the fixed origination rate”) shall be no more than 0.472 pence per minute.

*We have considered the methodology you have outlined in the Initial notice and find that it’s fair and proportionate to the Jersey market place.*

- The rate charged by JT for call termination on telephone networks provided at a fixed location in Jersey (“the fixed termination rate”) shall be no more than 0.428 pence per minute.

*We have considered the methodology you have outlined in the Initial notice and find that it’s fair and proportionate to the Jersey market place.*

- The fixed origination rate and fixed termination rate shall be billed on a per second basis effective from the first second.

*We strongly agree with this element of the proposed direction . As we stated in our response to your Initial Notice on Mobile Termination Rates in Jersey, our customer research, as part of our y:tel proposition is that there is a real demand from customers for per second billing with no minimum call charge. We are currently taking the commercial risk and charging our customers on a per second basis. It is therefore very important that this element of the direction is back dated as you suggest.*

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- The fixed origination rate shall apply with respect to all calls originated on JT's fixed line network on a technology-neutral basis (i.e. from both copper and fibre networks) and irrespective of the destination of the traffic.

*We have considered the methodology you have outlined in the Initial notice and find that it's fair and proportionate to the Jersey market place.*

- The fixed termination rate shall apply with respect to all calls terminated by JT on its fixed line network on a technology-neutral basis (i.e. from both fixed line and mobile networks) and irrespective of the origin of the traffic.

*We have considered the methodology you have outlined in the Initial notice and find that it's fair and proportionate to the Jersey market place.*

If you have any queries please do not hesitate to contact me on 01534 506413.

Yours sincerely



Ian Ridgway  
25<sup>th</sup> September 2012