



**JT's response to CICRA's Pan CI Consultation on
Mobile Termination Rates**

19th June 2015

1. Introduction

This response is provided by JT (Jersey) Limited and JT (Guernsey) Limited, hereafter referred to jointly as JT.

2. Answers to Consultation Questions

Q.1. – Do respondents agree that the MTRs proposed should be introduced in the Channel Islands over the period defined by CICRA? Respondents who do not agree with either or both of CICRA’s proposals for MTRs or the period over which they are to be introduced are asked to provide reasons and evidence to support their position.

JT agrees that the proposed MTRs should be introduced in the Channel Islands over the period defined by CICRA.

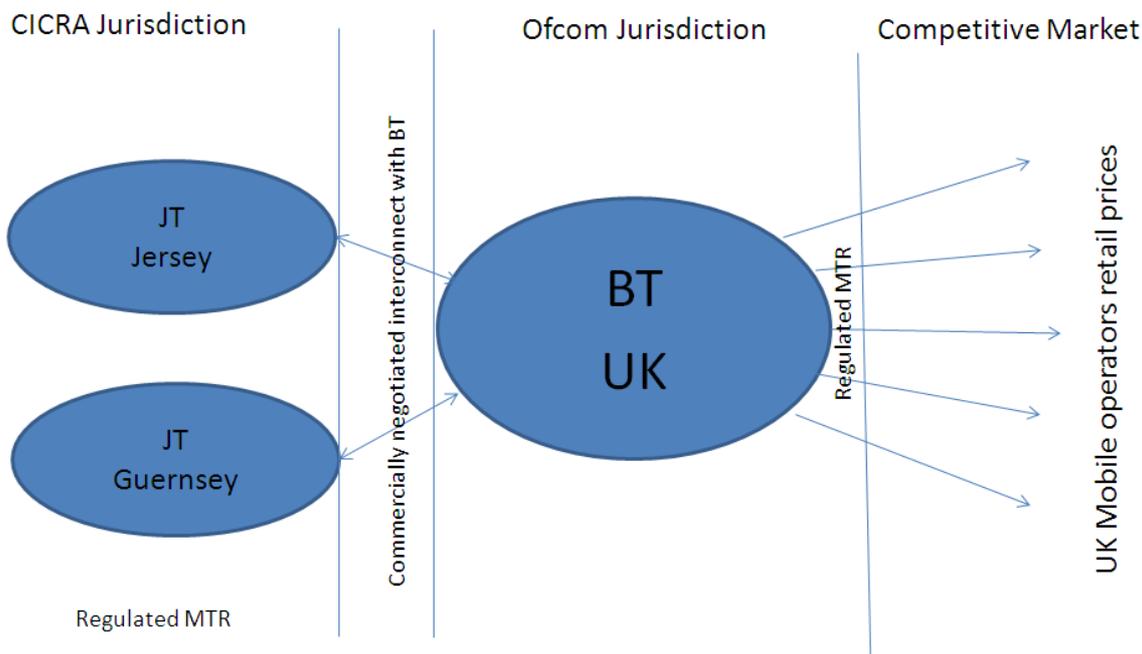
JT is however unconvinced that the changes to MTRs proposed will have the desired effect of ensuring that Channel Islands calls remain in the call bundles offered by UK mobile operators.

JT, like the other Channel Island mobile operators, negotiate interconnect rates to the UK with its interconnect partners, which in the case of JT is BT. These rates are commercially negotiated and therefore outside of the remit of CICRA or Ofcom. The retail rates charged by the UK mobile operators and decisions on whether Channel Island mobile ranges should be included in UK mobile operator bundles is outside the remit of Ofcom and is at the complete discretion of the UK mobile operators.

The only area in which the national regulatory authorities (CICRA and Ofcom) have jurisdiction over is the MTRs in the UK and the Channel Islands, but as described above there is no correlation between the MTRs charged and the retail rates and bundles offered by the mobile operators in the UK or the Channel Islands.

JT therefore cannot see how the problem identified by Ofcom and detailed on page 15 of the CICRA consultation document will be solved by reducing Channel Island MTRs.

Diagram showing regulatory jurisdiction for mobile pricing (wholesale and retail)



Q.2. –Do respondents agree that it is appropriate for CICRA to change the description of the market in which the operator has been found to have SMP? Respondents who do not agree are asked to provide reasons to support their position.

JT agrees that it is appropriate for CICRA to change the description of the market in which the operator has been found to have SMP.

Q.3 – Do respondents agree that it is appropriate for CICRA to include Marathon in the scope of the regulation of MTRs? Respondents who do not agree are asked to provide reasons to support their position.

JT agrees that Marathon should be included in the proposed MTR regulation.