

power to you

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

22 October 2012

For the attention of Andrew Riseley – Executive Director

Dear Sir,

Jersey Airtel Limited response to Initial Notice Determination issued to JT (Jersey) Limited Document No: CICRA 12/44

With reference to the Jersey Competition and Regulatory Authority's (JCRA) initial notice document dated September 2012 outlining the JCRA's proposal to cap JT's FTRs at 0.428 ppm and FORs at 0.472 ppm, being the same rate as CWG in Guernsey since 2010. The JCRA having also proposed that the FTR cap be backdated to 1 April 2012. This being a flat rate (no time of day distinction) and calls to be charged on a per second basis (no minimum call charge or call duration). This in effect will put in place common FIRs across the Channel Islands. The JCRA have also proposed this cap remain in place until 30 September 2013 when it is intended that further revised FIRs would be determined for both Jersey and Guernsey. Account will be taken of international developments, such as the move to LRIC based pricing, before the JCRA decide whether any further change is required.

JAL accepts and appreciates the JCRA's proposal and would propose for future to benchmark termination rates based on other jurisdictions which have comparable and relevant scenarios.

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

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