

**Daniel Vincent
JCRA
2nd Floor
Salisbury House
1-9 Union Street
St Helier
Jersey
JE2 3RF**

Dear Daniel

Mobile Termination Rates in Jersey

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

- **The rate charged by the relevant licensee for voice call termination on its public land mobile network in Jersey (“the mobile termination rate”) shall be no more than 4.11 pence per minute.**

We have considered the methodology you have outlined in the initial notice and find that it is fair and proportionate to the Jersey market place.

- **there shall be no additional charge (other than the mobile termination rate) applied by the relevant mobile network operator for any on-island transit of a call to be terminated on a mobile network;**

We equally agree with the methodology you have applied and concur with your conclusions.

- **the mobile termination rate shall be billed on a per second basis effective from the first second;**

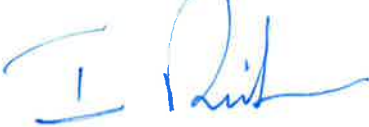
We strongly agree with this element of the proposed direction. Our customer research, as part of our y:tel proposition is that there is a real demand from customers for per second billing with no minimum call charge. We will be taking the commercial risk and charging our customers on this basis from 28th August, on the basis of the arguments contained in your proposed direction. It is therefore important that this element of the direction is backdated. We suggest CICRA might like to take the opportunity to align the end of the fixed price agreement in both Jersey and Guernsey.

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We are also taking a similar commercial risk on per second billing, with no minimum call charges on fixed line services on the understanding the CICRA will be issuing a initial notice on fixed line termination rates, with a similar backdating provision shortly.

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

Yours sincerely



Ian Ridgway
24th August 2012