

Andrew Riseley
Chief Executive
CICRA
2nd Floor
Salisbury House
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St Helier
Jersey
JE2 3RF

05 March 2013

Dear Andrew

Provisional decision – Cable & Wireless Guernsey and Cable & Wireless Jersey – Notification of change of control (25th February 2013)

Cable and Wireless Guernsey Limited (CWG), Cable & Wireless Jersey Limited (CWJ) and the Batelco Group, together (CWC) welcome the opportunity to respond to CICRA's provisional decision regarding Cable & Wireless Guernsey and Cable & Wireless Jersey – Notification of change of control issued as CICRA's Document Number: 13/06 on 25th February 2013. We note that the provisional decision follows a period of public consultation to seek the views of respondents to the application of the change of control provisions in telecoms licences in the Bailiwicks of Guernsey and Jersey, in particular in the context of the proposed acquisition of CWG and CWJ by Batelco.

CWC wishes to bring to CICRA's attention our concerns over the text of proposed new license conditions, specifically clause LC2.11 which if adopted will severely constrain the business' operational efficiency, financial viability and competitiveness in the performance of its duties and obligations under the fixed telecommunications license of CWG. We therefore submit the attached revised wording to clause LC2.11 Ring Fence and LC 2.12-2.19 Undertakings from Ultimate Controller, for your review and consideration.

We would also welcome the opportunity to continue dialogue with CICRA regarding the ongoing necessity of clause LC2.11 and its application to other fixed license operators across the Channel Islands

We are available to discuss any aspect of our submission if needed, at your earliest convenience.

Thank you for your attention to this matter and we look forward to your acceptance to the suggested amendments in the final notice decision on March 08th 2013.

Yours sincerely,



Eddie Saints
Chief Executive

Cc: Chris Durnell Head of Legal & Regulatory, CWC Channel Islands
Cc: Bernadette Baynie, Group General Counsel, Batelco