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15 August  
2012  
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Jersey Competition Regulatory Authority,  
2nd Floor, Salisbury House,  
Union Street,  
St Helier,  
Jersey,  
JE2 3RF.

10 August 2012

**For the attention of Andrew Riseley – Executive Director**

Dear Sir,

**Jersey Airtel Limited response to Initial Notice Document Proposed direction to mobile network operators –  
Document No: CICRA 12/40**

With reference to the Jersey Competition and Regulatory Authority's (JCRA) initial notice document dated 30 July 2012 outlining the JCRA's proposal to cap MTRs for all Jersey MNOs at 4.11 ppm. It is also proposed that the MTR cap of 4.11 ppm be backdated to 1 April 2012. This being a flat rate (no day or weekend distinction) and calls to be charged on a per second basis (no minimum call charge or call duration). The JCRA have also proposed this cap remain in place until 30 September 2013 when it is contemplated that further revised MTRs would be determined for both Jersey and Guernsey, Jersey Airtel Ltd (JAL) are pleased to be able to provide their comments:

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

A handwritten signature in blue ink, appearing to read 'Lisa Moyse'.

Ms. Lisa Moyse  
Head – Roaming & Regulatory Affairs  
Jersey Airtel Limited