



Daniel Vincent
JCRA
2nd Floor Salisbury House
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JE2 3RF

28th August 2012

Dear Daniel

Initial Notice on Mobile Termination Rates

I refer to the Initial Notice issued on 30 July 2012 as document number CICRA 12/40, on Mobile Termination Rates in Jersey, and the proposed directions to mobile network operators contained within that document.

Cable & Wireless Jersey Limited (“CWJ”) notes the intention to direct each mobile network operator to charge no more than 4.11ppm for voice call termination on their respective networks, effective retrospectively to 1 April 2012. The other main change is to move to charging on a per second basis, from the first second of the call.

CWJ notes that the direction will expire on 30 September 2013, on the basis that a pan-Channel Islands review of MTRs will have been completed by that time, with any resulting change to the MTR to be applied on a consistent pan-island basis. CWJ looks forward to engaging in this more detailed review in early 2013. As with the 2007 review of MTRs in Guernsey, CWJ would expect there to still be significant differences in the quality of cost information available from the respective operators given that Cable & Wireless Guernsey is currently the only operator to produce and publish audited separated accounts on either island.

In its response to the earlier Initial Notice issued on MTRs in January 2012, CWJ has made CICRA aware of its views on changing the MTR in advance of changing the fixed interconnection rates in Jersey. We note that the Initial Notice on PSTN termination rates that was also published by CICRA on 30 July 2012 has now been withdrawn. However, in the interests of trying to get some much-needed regulatory progress in Jersey, and noting that there is no reason why prices for interconnection services in Jersey should be any higher than those charged in Guernsey, CWJ is prepared to accept the current directions contained in this Initial Notice. This is conditional, however, on a new Initial Notice on fixed interconnection rates being issued by the JCRA as soon as possible, with those rates also being applied retrospectively from 1st April 2012 and being no more than the rates that apply in Guernsey. On that basis, CWJ does not intend to make any settlement payments to OLOs for MTRs until such time that the necessary changes in the Fixed Reference Offer rates to align them with those in Guernsey are confirmed by the JCRA.

Finally, I should like to confirm that CWJ has no objections to this letter being made public in the event that CICRA decides it would like to publish any responses to the Initial Notice on the CICRA website.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Durnell', written in a cursive style.

Chris Durnell
Head of Legal and Regulatory, CWC Channel Islands and Isle of Man