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

30/06/2014

For the attention of Mr. Michael Byrne

Dear Michael,

"Pan-Channel Island Consultation on Spectrum Awards in the 2.1 and 3.6 GHz Bands"

With reference to your letter CICRA 14/21 dated April 2014, please find our response below.

We appreciate and support the efforts done by CICRA in consulting the existing stakeholders before allocating spectrum. We also believe that electro-magnetic spectrum is a national resource and should be put to use for interest of consumers and development of telecommunication market in Jersey and Guernsey.

Q1. Do you agree that there is no excess demand for spectrum in the 2.1 GHz and 3.6 GHz bands and that Clear Mobitel's request, in principle, can be satisfied without it being at the expense of other operators' requirements?

JAL/GAL response – Airtel has always been in favor of promoting competition in Channel Islands Telecoms market. To that end, we have been supportive of new entrants (me:mo), infrastructure sharing (Newtel, Marathon). However, we believe that spectrum is a national resource and should be used in providing world class services to Channel Island customers. Hence, we are averse to the practice of spectrum hoarding.

We welcome the initiative shown by Clear Mobitel in acquiring the spectrum. However, we have below reservations to their request:

- There is excess demand for spectrum in 2.1 Ghz as illustrated by our letter to CICRA dated 11th June 2014. We have asked for 5 MHz of additional spectrum to relieve congestion in our 3G network. The band requested by Clear Mobitel is in direct conflict with our request (2130-2135 MHz (matched with 1940-1945 MHz)).

[REDACTED]

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- In case spectrum neutrality is to be allowed, then same minimum requirements as are applicable to winners of the LTE spectrum bid should be made mandatory for Clear Mobitel.

[REDACTED]

I trust our response meets with your expectation and please do not hesitate to contact me if you have any further questions in this regard.

Yours sincerely

A handwritten signature in black ink, appearing to read "Lisa Moyse".

Lisa Moyse
Head-Roaming & Regulatory Affairs – Channel Islands
Jersey Airtel Ltd