



Response by Sure (Jersey) Limited to CICRA Initial Notice 15/45: Jersey Telecom Gigabit Isles compensation for enforced router replacement

Sure (Jersey) Limited welcomes the publication of this Initial Notice regarding the review of JT's compensation for enforced router replacement, which was issued by CICRA on the 26th October 2015.

Sure is in agreement with the proposed Direction as set out on page 8 of the Initial Notice but we are slightly concerned that there is no explicit statement regarding the duration of the arrangements. Sure believes that the arrangements supporting fibre router subsidy must remain in place until the completion of the entire fibre migration project. We are already aware that some customers have been receiving updates from JT that they will not be migrated until 2019. We also believe there is ambiguity regarding the 9,000 POTS customers that now seem to be no longer in scope for this project, with a lack of clarity as to how those premises will be completed.

Sure does not wish to delay this Direction coming into effect but we would like to be assured by CICRA that the intention is that these arrangements stay in force until the fibre migration programme is completed and that JT is aware of, and in agreement, with this. If this is indeed the case then we agree that the Direction should come into force on the 27th November 2015. However, if there is any doubt about this then we would suggest that CICRA needs to add an explicit statement to the Direction to cover this. For example, this could say: "The arrangements agreed for the provision and support of Fibre router subsidy shall remain in force until 100% of Jersey copper services are successfully migrated to fibre".

Sure would hope that if CICRA feels it is necessary or prudent to include such a statement that it would not require CICRA to reissue another Initial Notice but that it could still proceed to issue the Final Notice and Direction to JT.

Sure (Jersey) Limited
26th November 2015