



**Response to CICRA's
Mobile Call Termination
Initial Notice (Jersey) and Draft Decision (Guernsey)
Market Definition and Finding of Dominance
17th May 2017 (re-issued 23rd June 2017)**

This is a non-confidential response provided by JT (Jersey) Limited and JT (Guernsey) Limited referred to jointly as JT. The comments made in this response relate to both the Jersey and Guernsey market.

The JCRA and GCRA (jointly referred to as CICRA) issued a consultation in November 2016 to seek the views of stakeholders on the following issues:-

- a) Do the MNOs active in Jersey and Guernsey have SMP on the relevant market ?
- b) If the MNOs have SMP, is a price control (ie, setting an MTR rate) the most appropriate remedy ?
- c) If setting an MTR rate is the more appropriate remedy, what is the basis on which the MTR should be calculated ?

CICRA issued an Initial Notice (Jersey) and Draft Decision (Guernsey) finding:-

1. A relevant market exists for termination services that are provided by a Mobile Network Operator (MNO) to another communications provider, for the termination of voice calls to Jersey (or Guernsey) mobile numbers in the area served by that MNO and for which that MNO is able to set the termination rate. ("Finding 1")
2. Each MNO is dominant in the market for the provision of MCT on its own network. Each MNO has 100% share of wholesale call termination on its own network and each MNO is acting as a monopoly in the provision of that service. ("Finding 2")

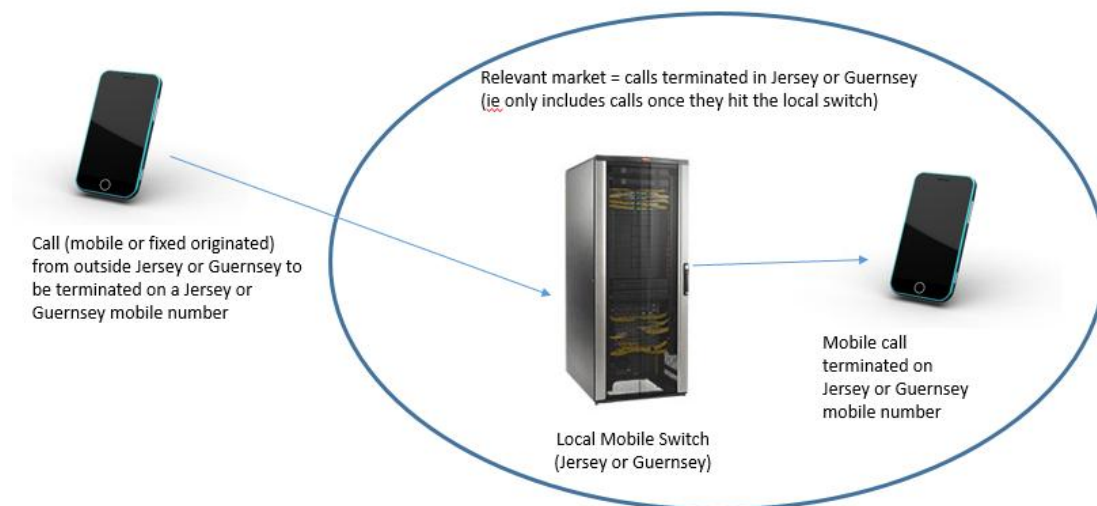
Finding 1

JT understands (and CICRA confirmed in a meeting on 5th May 2017¹ and on 13th June 2017) that Finding 1 relates to the termination of calls to a Jersey MNO (in the case of calls to a Jersey mobile number range) or to a Guernsey MNO (in the case of calls to a Guernsey mobile number range). Finding 1 only relates to calls (fixed or mobile) once they reach the

¹ Conference call between Daragh McDermott and Carol Gunasekara of JT and Kevin Werry and Sarah Livestro of CICRA.

Jersey mobile switch (in the case of Jersey) or the Guernsey mobile switch (in the case of Guernsey) and does not relate to the conveyance of calls before they reach the respective island (Jersey or Guernsey) mobile network. Our understanding of Finding 1 is described in the below diagram.

CICRA Finding 1 – Relevant market for Mobile Termination Services



JT do not object to the finding as described above.

Finding 2

JT has no objection to Finding 2.