



**Clear Mobitel (Jersey) Limited**  
**Clear Mobitel (Guernsey) Limited**

Response to Pan-Channel Island Consultation on Spectrum  
Awards in the 2.6 GHz Band

April 2018

## Introduction

This current consultation is a continuation of a process that began some for years ago when both islands under their respective regulatory authorities ran a consultation on the distribution of 2600 MHz spectrum. The Guernsey consultation remained moribund but in Jersey the JCRA proceeded to the issuing of recommendations to Ofcom on the size and type of spectrum packages to those operators that had expressed an interest. Clear Mobitel (Jersey) Limited and Clear Mobitel (Guernsey) Limited ('Clear') received a recommended allocation and it was on that basis that it started to invest money in the island to establish an independent network.

Subsequently, after the amalgamation of the two regulatory bodies into its current form under CICRA, it was decided to withdraw these recommendations and a letter to this effect was sent to the operators. On the basis that it had fairly received its package, Clear sought to challenge this unilateral action by the regulator through the Royal Court of Jersey. In this respect the judgement went in favour of CMJ. Later, Clear, in consultation with the regulator, ceded this allocation in order that a fresh consultation on the distribution of the 2600MHz spectrum could proceed.

## Response to Consultation

**Q1: Respondents are invited to comment on the allocation of additional spectrum to Airtel, JT and Sure, taking their allocation to 20 MHz per operator, and the re-organisation of this band.**

Clear is a company that has much experience in wireless technology and recognizes that the development of competitive broadband services in the Channel Islands will provide the business community with services to help stimulate growth over the foreseeable future.

Clear recognizes that spectrum is a key resource for the development of a competitive and innovative market for local businesses. It also recognizes need for good housekeeping and the efficient distribution of available spectrum for maximum utility. Clear is aware that the 2600MHz spectrum has so far remained unused by the current operators, however, the prospect of 5G technologies seems to have reinvigorated interest.

Spectrum is a scarce resource and as such should be used as efficiently as possible in all cases. Clear is also aware of the potential difficulties presented with 2600MHz where it closely shares the band with various air control systems and thus special precautions are necessary. Clear was aware of this issue when first awarded allocations but was prepared to deal with the

technical problems in order to launch its service. However, delays in licensing meant that it was unable to proceed as planned.

Clear has no objection in principle to the existing operators being allocated additional bandwidth provided that they demonstrate that it will be utilized in an appropriate and timely manner. However, Clear notes that there will nevertheless be a parcel of spectrum available in both islands and would be interested in making a fresh application for that bandwidth.

The current distribution of spectrum is as below:

	Guernsey					Jersey				
	800	1800	2100	2600	3600	800	1800	2100	2600	3600
Sure	45	15	10	11	0	35	15	10	11	0
JT	40	10	10	11	0	45	15	10	11	0
Airtel	35	10	10	11	0	35	15	10	11	0
Clear	0	0	9.7			0	0	9.7	0	0
Marathon	0	0	0	0	0	0	0	5	0	0
Newtel	0	0	0	0	0	0	0	0	0	20
Flo	0	0	0	5	0	0	0	0	0	0

**For the avoidance of doubt, this document may be published in its entirety.**

**CMJ**

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