



Non-confidential response by Sure (Guernsey) Limited and Sure (Jersey) Limited to CICRA's Pan-Channel Islands Consultation on Spectrum Awards in the 2.6GHz Band.

Sure (Guernsey) Limited and Sure (Jersey) Limited, collectively referred to as "Sure", are pleased to provide this response to CICRA's Pan-Channel Islands Consultation on Spectrum Awards in the 2.6GHz Band which was issued on the 4th April 2018.

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

Sure has previously outlined its views on the 2.6GHz band and a non-confidential version of this response can be found on the below link.

<https://www.cicra.gg/media/597683/t1309gj-2.6ghz-spectrum-sure-response.pdf>

In order to satisfy customer demand for increased data usage, Sure has requested an additional 10MHz of 2600MHz spectrum, across both islands, to allow the use of a single continuous 20MHz LTE carrier.

Having recently launched a new 4G mobile broadband product in Jersey, Sure expects data usage to increase further throughout 2018. In order to satisfy this increased usage, carrier aggregation will be required to satisfy these demands, more so in urban areas.

The graph below shows the monthly peak data consumption of the Sure Guernsey and Jersey mobile since January 2016, demonstrating the constantly increasing requirements for mobile data.

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Allocation of a non-fragmented 20MHz is essential to maximise the potential of the additional bandwidth. Given the current allocation of spectrum within this band, and as all three established mobile operators have requested additional spectrum, a re-farming exercise will be required. It would be logical for Airtel to move from their existing band (downlink 2630.0 – 2640.0, uplink 2510.0 – 2520.0) to a higher band which, subject to a successful application by Sure, would allow Sure to utilise the above-mentioned band without the requirement to re-farm.

In summary, Sure would support a decision to award an additional 10MHz of 2.6GHz spectrum to Airtel, JT and Sure and any re-farming process that would be required.