



Jersey Competition Regulatory Authority
2nd Floor Salisbury House
1-9 Union Street
St Helier
Jersey
JE2 3RF

Dear Sirs

Future Economic Regulation of the Broadband Market: Document 18/21 4 May2018

Thank you for the opportunity to respond to the above consultation. Please see our response to the questions raised

Question 1: Does the respondent agree with CICRA's provisional view relating to the Channel Islands' broadband markets set out above?

Response 1: Yes

Question 2: Does the respondent agree with CICRA's statement relating to best practice regulatory framework?

Response 2: Yes

Question 3: Do respondents consider there is appropriate access and reasonable control over the wholesale network elements listed above by retail broadband providers? If these descriptions are ambiguous or would benefit from further elaboration in terms of their definitions respondents are asked to set out their views in as much detail as feasible.

Response 3: *We feel that there is cross subsidisation between JT Retail and Wholesale as if you look at the retail pricing within the offers JT have they could not feasibly make a profit.
If JT were forced to have a wholesale network that supplied all competitors on a fair and equal basis there would be far more competition.*

Question 4: Are there additional wholesale network elements that have not been identified that have a material bearing on the ability of broadband retailers to provide services? If so respondents are asked to set these out fully?

Response 4: *More and more people do not require a home phone line however this is compulsory with JT people want to use VIOP to make calls and keep their phone number.*

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BROADBAND | MOBILE | HOME PHONE | CABLE TV

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Question 5: Do respondents consider there is a need for economic regulatory intervention of the wholesale charges by the monopolists who control access to the networks elements above or any additional elements respondents have identified?

Response 5: Yes, as above if you are going to take competition seriously.

Question 6: What do respondents consider are the appropriate investment incentives that an economic regulatory framework should provide to both support investment upstream in the wholesale network as well as support innovation and choice by competing retailers? The respondent is asked to set out the alternatives it considers feasible and its evidence and reasoning for those its supports and those it does not.

Response 6: We should follow a proven way forward i.e. BT.

Yours faithfully

Ian Ridgway
Director
22 May 2018

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