



Sure's response to CICRA's Call for Information re Mobile Backhaul Services

Sure (Guernsey) Limited ("Sure Guernsey") and Sure (Jersey) Limited ("Sure Jersey"), which are also collectively referred to as "Sure" within this document, are submitting this paper in response to CICRA's 'Call for Information: Backhaul Products and Services to Support the Mobile Markets of the Channel Islands', which was published on the 19th October 2018, as CICRA document 18/43. This is a non-confidential response, which we are happy for CICRA to publish on its website.

CICRA sets out in its document what it sees as the importance of the availability of fibre-based connectivity to mobile sites (across the Channel Islands). Sure very much supports this view, albeit that this is not the only suitable means of connectivity for mobile backhaul solutions.

CICRA also discusses the introduction of 5G services, but their capacity requirements are yet to be established and we believe that they should therefore not form part of CICRA's current considerations.

By coincidence, some two weeks before CICRA issued its Call for Inputs, Sure Guernsey issued its own consultation to the local telecoms market regarding the wider topic of wholesale leased lines in Guernsey. The responses received (from four stakeholders) are already helping to shape Sure's considerations for the development of our wholesale portfolio, which may in itself help to provide a wider variety of solutions and price points for mobile backhaul purposes.

Sure's responses to the five questions posed by CICRA are set out below:

1. What backhaul products as services do you currently obtain from another operator?

Sure's requirements are for 100Mbps leased line connectivity for the majority of its base station sites, with the sites with higher utilisation being served by 1Gbps links. Both of these speeds are achieved through standard fibre-based services within the operator's leased lines portfolio.

2. Do the current backhaul products meet your technical / operational requirements? If not, please provide the rationale behind your response.

Yes. Wired (rather than wireless) connectivity for our mobile network has been built using standard wholesale leased lines and we have no technical or operational issues in this regard.

3. Are the current backhaul products affordable and priced at a level that supports your current business objectives? If not, please provide the rationale behind your response.

Yes, based on our current network requirements. In part, this is because not all of our base stations currently require a leased line for data backhaul purposes. For example, we have numerous base stations that are connected to the rest of our mobile network via radio links. Until such time as the backhaul requirements for 5G are established we will not be in a position to know whether such radio links (or newer variants of them) will continue to be able to provide a sustainable means of data connectivity. That is therefore a consideration for the future and not for today.

4. What additional backhaul products should be made available? Please provide the rationale behind your response.

On the basis that Sure's requirements are currently being fulfilled through a mixture of leased line services and radio links we do not currently have a need for additional backhaul services. Noting the comments made by CICRA in relation to Airtel's reliance on other parties to provide leased lines for backhaul connectivity, we may be able to provide an alternative fibre-based solution to that currently available in the Jersey market, for certain of Airtel's mast site locations. We would be happy to hold feasibility discussions with Airtel, should this be something that might potentially interest them.

5. What pricing methodology should be applied to any new backhaul products that are made available? Please provide the rationale behind your response.

Sure has yet to understand the specific need for new backhaul services, particularly as leased line speeds as high as 10Gbps are now available across the Channel Islands.

We believe that there may be a technically achievable alternative solution that, in many circumstances, could help to reduce the costs incurred by mobile operators in relation to their backhaul requirements. These cannot currently be discussed in this response, but we would be happy to meet with CICRA in the first instance, prior to any commercial feasibility discussions with operators.

Sure (Guernsey) Limited & Sure (Jersey) Limited

16th November 2018