



3rd June 2019

S
Mr Michael Byrne
Chief Executive Office
Jersey Competition Regulatory Authority
2nd Floor Salisbury House,
1-9 Union Street
St Helier,
Jersey,
JE2 3RF

Dear Michael

Draft Decision: Wholesale Broadband Services – 50 and 100 Mbps

Thank you for providing us with the opportunity to comment on you Draft Decision.

Question 1

Does the respondent agree that the States of Jersey Policy is clear in its statement requiring “that wholesale access seekers get access to wholesale products, which allow access seekers to compete based on differentiated retail services”?

Response 1

This is a matter for CICRA

Question 2

Does the respondent agree that JT should be required to reinstate the 100 Mbps wholesale broadband service?

Response 2

Yes, at an affordable price and sustainable retail margin

Question 3

Does the respondent agree that JT should be required to introduce a 50 Mbps wholesale broadband service?

Response 3

Yes, at an affordable price and sustainable retail margin

Question 4

Does the respondent consider that, if JT includes (a) the 100 Mbps and (b) the 50Mbps in its wholesale broadband product portfolio, this would meet the respondent’s requirements for wholesale products in order to effectively compete in the market with differentiated retail services? If the respondent has alternative views or evidence respondent is asked to explain those and provide all of this analysis and assessment relating to this matter to inform the Authority’s considerations and next steps.

BROADBAND | MOBILE | HOME PHONE | CABLE TV

Home Net Limited, 27 Beresford Street, St.Helier, Jersey, Channel Islands JE2 4WN

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Company N°: 67490 | GST N°: 0039951

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Question 5

Does the respondent agree with the Authority's conclusion that the potential introduction of (a) a 100 Mbps and (b) a 50 Mbps services does not require any product development and impacts only on systems?

Response 5

Home Net agrees with the Authority's conclusion

Question 6

Does the respondent consider that if a decision were made by the Authority to direct JT Wholesale to introduce (a) the 100Mbps and (b) the 50 Mbps wholesale broadband services this should be undertaken within 3 months of the completion of the Authority's statutory process on this matter?

Response 6

Home Net agrees with the Authority' that JT should be directed to introduce the services within 3months of its decision. However, there is no need for any delay, this could be done immediately.

Question 7

Does the respondent agree that the potential 50 Mbps wholesale broadband service should be priced at £16.23 per month? If the respondent has alternative views or evidence respondent is asked to explain those and provide all of this analysis and assessment relating to this matter to inform the Authority's considerations and next steps.

Response 7

Obviously, the price is what it was historically however this is still overpriced!

Question 8

Does the respondent agree that the potential 100Mbps wholesale broadband service should be priced at £17.84 per month? If the respondent has alternative views or evidence respondent is asked to explain those and provide all of this analysis and assessment relating to this matter to inform the Authority's considerations and next steps.

Response 8

Obviously, the price is what it was historically however this is still overpriced!

Question 9

Does the respondent agree that it is appropriate that the potential wholesale price included in this Call for information should remain fixed for a period of three years?

Response 9

Home Net agrees that the price should remain fixed for three years.

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Question 10

Does the respondent agree that JT Wholesale should enter into a consultation process to remove the 50, 100 and 250 Mbps services only following the successful introduction of a Bitstream service?

Response 10

Home Net agrees that that JT Wholesale should enter into a consultation process to remove the 50, 100 and 250 Mbps services only following the successful introduction of a Bitstream service

We trust that our response is of assistance to CICRA and request that CICRA urgently engage with Home Net regarding the proposal to reallocate existing spectrum.

Yours sincerely

Gary Whipp
CEO

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