

Jersey Competition Regulatory Authority,  
2<sup>nd</sup> Floor,  
Salisbury House,  
1-9 Union Street,  
St Helier,  
Jersey,  
JE2 4JD.

24<sup>th</sup> December 2019

**For the attention of Mr. Michael Byrne**

Dear Michael,

**'Comments on T1452J Initial Notice of a proposed Direction to JT (Jersey) Limited – Wholesale Access: Bitstream'**

Jersey Airtel Limited & Guernsey Airtel Limited hereafter referred to jointly as "Airtel" welcome the JCRA's Initial Notice of a proposed Direction to JT (Jersey) Limited on the Wholesale Access: Bitstream.

One observation we have at this stage is the price set for such a service. £27.90 per port per month is very high input cost. The initial business case being worked on by Airtel becomes profitable at a price under £20.00. We note that CICRA are planning to work on this in 2020 which is a welcome move. The price will be for all services on the line/port.

Please do not hesitate to contact me if you have any questions in relation to the above.

Kind regards,



Lisa Moyse  
Head-Roaming & Regulatory Affairs