



Channel Islands Competition Regulatory Authority,
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Response by Jersey Airtel Limited and Guernsey Airtel Ltd to CICRA

"2018/9 IN & FD - Review of Mobile Termination Rates (MTRs) in Jersey"

Jersey Airtel Ltd and Guernsey Airtel Ltd (collectively referred to here as "Airtel") are submitting a joint response to two separate CICRA documents titled '2018/9 Review of Mobile Termination Rates in Jersey – Initial Notice' and '2018/9 Review of Mobile Termination Rates in Jersey – Final Decision'.

Airtel continues to be of the opinion, that there is no market need for review of MTRs in Channel Islands.

Further, CICRA has continuously failed to give any empirical evidence of the benefit, either to Channel Islands consumers or economy in general, which it has repeatedly claimed will be borne by the proposed changes. However, Airtel has provided evidence of all costs and revenue it incurs/derives from MTR. This allows the Authority a clear view of the losses a challenger telco like Airtel will incur due to the proposed lowering of MTRs.

To start with, CICRA has not given any reason for withdrawing the previous IN & FD (document no. CICRA 19/44 & 19/42), they have not elaborated the changes that have been made in the latest IN & FD (document no. CICRA 20/04 & 20/05). Without this being clear, it is difficult to assume that there will not be any further changes to this decision. Therefore, CICRA is required to issue a detailed clarification on the rationale behind this withdrawal, including a detailed explanation for all the changes made.

Below are the observations and related queries that Airtel believes that CICRA must answer in addition to the above for Airtel to formulate an informed understanding:

1. Page 7 of document no. CICRA 19/44 - point 2; sub point j, "network access" has been removed in the latest IN.
2. Page 7 of document no. CICRA 19/44 - point 2; sub point l, "third party" has been removed in the latest IN.

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3. Page 7 of document no. CICRA 19/44 - point 3 which connects j & l from above has been removed in the latest IN.
4. Page 7 of document no. CICRA 19/44 - point 7 has been modified to separate Call Termination from Interconnect in the latest IN.
5. Full clarity around how this works in relation to MNP is required as this has not been captured in the revised IN & FD.
6. Why only Jersey is being reviewed when all previous discussions and consultations have been pan Channel Islands?

Finally, it is Airtel's understanding that the remit of this decision is only for the leg of the Call from Airtel Switch to Airtel's customers device. Any charges incurred by Airtel for bringing the Call to its Switch, Airtel is free to negotiate that with relevant parties and is outside of current or proposed regulation.

Should you have any questions in this respect please don't hesitate in contacting the undersigned. We look forward to CICRA's response to all of the above mentioned points at earliest.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lisa Moyse', written in a cursive style.

Lisa Moyse
Head-Roaming & Regulatory Affairs

