



# Telecommunications (Jersey) Law 2002

## Case T-027: Outage of network of JT (Jersey) Limited on 12 July 2020: Further Directions to JT (Jersey) Limited

Document No: JCRA 22/19

Date: 17 March 2022

Jersey Competition Regulatory Authority  
2<sup>nd</sup> Floor Salisbury House, 1-9 Union Street  
St Helier  
Jersey, JE2 3RF  
Tel 01534 514990

Web: [www.jcra.je](http://www.jcra.je)

# Contents

## Section

1. Executive Summary.....	1
2. The scope of Direction 3 and Direction 4.....	2
Summary .....	2
Directions .....	2
<b>Directions issued to JT (Jersey) Limited.....</b>	<b>3</b>
3. <b>DIRECTION 3</b> .....	3
4. <b>DIRECTION 4</b> .....	4

## 1. Executive Summary

- 1.1 At 18:55 on 12 July 2020, JT's network on Jersey stopped functioning (the **Outage**). Services began to be restored from 21:44 – nearly three hours later. The majority of services to JT's Channel Islands customers were fully recovered by 3am on 13 July 2020, although its international services were not fully recovered until 5pm on 14 July and some remaining mobile issues were not finally resolved until 12 noon on 17 July 2020. The Outage affected many customers, including residential and business customers, across JT's fixed and mobile networks.
- 1.2 On 22 July 2020, the Authority notified JT that it was commencing an investigation to understand the cause of the Outage, and whether it raised any regulatory concerns about JT's performance of its obligations.
- 1.3 The Authority issued its [Decision and Directions](#) to JT on 17 September 2021, which imposed two Directions on JT, as set out in paragraphs 7.1(a) and (b) thereof, and referred to as Direction 1 and Direction 2. In summary, they required JT to respond to the Authority within 28 days with:
  - (a) under Direction 1, proposals for measures to be taken to rectify certain design issues, particularly with regard to the provision of emergency call services and observations and recommendations in certain technical reports, specifically the Niji Report<sup>1</sup> and the Touchstone Report<sup>2</sup>; and
  - (b) under Direction 2, proposals for a reporting framework to enable the Authority to monitor JT's progress in taking such measures.
- 1.4 The Decision and Directions provided for the Authority to make two further Directions, as described in paragraphs 7.1(c) and (d) and referred to as Directions 3 and 4, in relation to the proposals submitted pursuant to the Initial Directions.
- 1.5 The Authority issued its Notification of Proposed Further Directions to JT on 15 February 2022, setting out the proposed text of Direction 3 and Direction 4. The deadline for JT to make representations was 17:00 on 16 March 2022. JT made no representations in relation to the proposed Direction 3 and 4, but consulted with the Authority in relation to non-substantive changes to the proposed text of Direction 4.
- 1.6 Directions 3 and 4 come into effect on 17 March 2022.

---

<sup>1</sup> As defined in paragraph 4.44 of the Decision and Directions

<sup>2</sup> Ibid, para 3.14

## 2. The scope of Direction 3 and Direction 4

### Summary

- 2.1 This section sets out the Authority's decision in respect of the directions to be issued to JT.
- 2.2 The Authority considers that it is appropriate to issue further directions to JT pursuant to Article 19(1) of the Telecommunications (Jersey) Law 2002 and as contemplated by the Decision and Directions.

### Directions

- 2.1 **Direction 3** addresses outstanding recommendations in the Niji Report and issues and observations in relation to the Touchstone Report, with the intention of ensuring so far as feasible that there will be no further outage arising from such issues, by means of:
  - (a) JT further developing its change and risk management procedures;
  - (b) JT assuring itself that its NTP<sup>3</sup> servers will correctly handle a Future WNRO Event;
  - (c) JT reinstating Time-based Keychain Authentication, subject to various conditions; and
  - (d) JT adopting and implementing certain policies relating primarily to its network, reflecting best practice as to addressing equipment obsolescence, business continuity/disaster recovery and network security.
- 2.2 **Direction 4** sets out how JT will report to the Authority on its compliance with the obligations set out in Direction 3.

---

<sup>3</sup> Terms defined in the Decision and Directions

## Directions issued to JT (Jersey) Limited

### 3. DIRECTION 3

3.1 The Authority directs JT (Jersey) Limited (*JT*) to comply with its obligations under Conditions 9 and 14 of its licence under the Telecommunications (Jersey) Law 2002 (the *Telecoms Law*) and to take all actions necessary to ensure that its network is resilient, reliable and secure for the benefit of the people of Jersey and to ensure that its network provides a public emergency call service at all times.

Indicative of JT's compliance with this Direction will be the following:

3.2 Having regard to the risks of relying solely on assurances from third parties, no later than 30 June 2022 JT undertaking such investigations and conducting such testing as may be required in order for JT to satisfy itself that its NTP servers will correctly handle any future GPS week-number rollover event;

3.3 JT having stated to the Authority that 'time-based keychain authentication is best practice' in relation to ISIS authentication in IP core networks, JT reinstating such authentication as soon as reasonably practicable and in any event:

(a) within 3 months of receiving from CISCO a fix for the IOS 'Panic Timer' bug, provided that JT is satisfied that such bug fix will be effective; or

(b) if such bug fix is not received by 30 June 2022 and (subject to any extension of time the Authority may agree to take account of any rescheduling of the release of the bug fix by CISCO) or if JT is not so satisfied, JT undertaking a revised Low Level Design review, to be completed no later than 30 September 2022 (or such later date agreed by the Authority if it grants an extension of time), and proposing for discussion with the Authority such alternative courses of action it intends to take to ensure the security and integrity of its key network servers; and

(c) in any event, ensuring that it complies with current industry best practice as regards the frequency of changes to passwords and as regards password generation and management generally;

3.4 JT implementing, maintaining, reviewing, updating, testing and complying with a change risk assessment and approval procedure in accordance with current industry best practice;

3.5 JT implementing, maintaining, reviewing, updating and complying with an obsolescence and support policy no less stringent than the document of that name dated 30 December 2021 and with reference JTGISP331;

3.6 JT implementing, maintaining, reviewing, updating, testing and complying with a security policy in relation to the Licensed Telecommunications Network and JT's corporate network in each case in accordance with current industry best practice; and

3.7 JT implementing, maintaining, reviewing, updating, testing and complying with a business continuity plan and a disaster recovery plan in relation to the Licensed Telecommunications Network, each in accordance with current industry best practice.

#### 4. DIRECTION 4

The Authority directs JT to report to the Authority on its compliance with Direction 3 and in particular:

- 4.1 In relation to Direction 3.1, JT shall confirm to the Authority no later than 30 June 2022 that it is so satisfied and shall provide to the Authority details of such evidence-based investigation and testing it has itself carried out or has commissioned from a third party;
- 4.2 In relation to Directions 3.2(a) and (b), JT shall keep the Authority regularly and fully informed (on a no less frequently than monthly basis and with reasonable evidence of the facts stated) as to the matters set out in Directions, including:
  - (a) as to the receipt, approval (or otherwise) and implementation of the bug fix;
  - (b) as to rescheduling of the release of the bug fix by CISCO, setting out details of such rescheduling together with any request for an extension of time by the Authority and, if such extension is granted, the subsequent status of such release, approval (or otherwise) and implementation of the bug fix; and
  - (c) where applicable, the results of the Low Level Design review together with the proposals referred to (which shall be delivered not later than 31 October 2022);
- 4.3 In relation to the procedure referred to in Direction 3.3, JT shall provide evidence satisfactory to the Authority that it has complied with such Directions in relation to Case T-046 as relate to such matters;
- 4.4 In relation to the policy referred to in Direction 3.4, JT shall submit:
  - (a) an extract from its asset register setting out all assets which are subject to such policy; and
  - (b) a report in relation to each such asset as to how the policy is being complied with with the first such report being submitted by 31 May 2022 and each subsequent report being submitted on a six-monthly basis;
- 4.5 In relation to the policy referred to in Direction 3.5, JT shall:
  - (a) by 31 May 2022, submit to the Authority a copy of such policy and ensure that the Authority is provided with any material updates to such policy when they come into effect: and
  - (b) submit a report setting out what steps have been taken pursuant to such policy as regards:
    - (i) verifying the security of the Licensed Telecommunications Network; and
    - (ii) addressing any material security incidents or breaches of such policywith the first such report being submitted by 31 August 2022 and each subsequent report being submitted on a six-monthly basis; and
- 4.6 In relation to the policy referred to in Direction 3.6, JT shall
  - (a) by 31 May 2022, submit to the Authority a copy of each such policy and ensure that the Authority is provided with any updates to each such policy when they come into effect: and

- (b) submit a report setting out what steps have been taken pursuant to each such policy as regards any incidents to which such policy relates

with the first such report being submitted by 31 August 2022 and each subsequent report being submitted on a six-monthly basis.

Without prejudice to Condition 4.5 of JT's licence, in relation to all material and data submitted by JT to the Authority pursuant to this Direction 4, JT shall be responsible for meeting the Authority's reasonable costs (including the costs of external advisors) in connection with receiving and reviewing the same and, if necessary, of carrying out such further investigation or verification as the Authority may determine. Where so directed by the Authority, JT shall lodge with the Authority a sum on account of some or all of such costs.

This Direction 4 shall remain in effect until 31 December 2027 save that:

- (c) the Authority shall have the discretion to reduce the frequency or detail required in relation to any of the above reporting requirements if it is satisfied that JT is complying with the relevant part of Direction 3; and
- (d) the Authority may determine that any of the above reporting requirements has been rendered unnecessary by reason of a change in the Telecoms Law or JT's licence.

Direction 3 and Direction 4 shall come into effect on 17 March 2022.

BY ORDER OF THE AUTHORITY