



Clear Mobitel (Jersey) Limited

**Case T-064 5G spectrum award process
Consultation to reassess interest and demand**

March 2022

Introduction

Clear Mobitel (Jersey) Limited ('CMJ') holds some spectrum allocations which have been awarded over time for use with 4G Technology. Currently CMJ is in the process of developing a strategy for the application of this spectrum.

Response to Consultation

Question 1: Do you support the Authority's planned approach to restarting the 5G spectrum award process or have views on alternative approaches?

5G promises to provide a step-change in mobile technology with the eventual universal coverage of a low-latency always on network. This will provide a platform for real-time systems that will enable the development of control systems for both mobile and fixed services, for example driverless cars, traffic management, health, environment and farming etc.

Elsewhere in the world operators and manufacturers have been developing 5G over the past two or three years. However, the recent pandemic had a considerable effect on the strategies employed by both operators and regulators. There has also been considerable development of the technology and the ways in which it is envisioned that it will be deployed. The pandemic identified the requirement for bandwidth to be more universally available with the switch to more home working and the need for more flexible approaches to employment.

Elsewhere operators and regulatory authorities are exploring the benefits of Open RAN¹. In the context of the islands this is an important consideration that could lead to rapid deployment and innovation.

Traditionally in Jersey mobile communications has been characterized as infrastructure competition, each operator creating a separate wireless network. This has led to multiple use sites with two or three operators duplicating the mobile networks and thus leading to overall inefficient use of spectrum and resources.

The ultimate aim of 5G is to provide a ubiquitous low latency network that can be used for real-time applications. In order to achieve this goal, it will be necessary to overlay several layers of wireless spectrum, with millimetre wave sites filling in busy urban areas, thus creating many more sites than at present. It is clear, therefore, that replicating such networks will be time consuming, expensive and inefficient in both use of spectrum and infrastructure. A more realistic solution in a small jurisdiction such as the Channel Islands would be to establish a jointly owned network on which individual suppliers could provide services².

¹ Open RAN Alliance: <https://www.o-ran.org/>

² SHARING OF SPECTRUM AND INFRASTRUCTURE TO FACILITATE EFFICIENT 5G NETWORKS DEPLOYMENT:
[https://www.itu.int/en/ITU-D/Regional-Presence/Europe/Documents/Events/2020/Spectrum_EUR_CIS/Pavel%20Mamchenkov%20\(1\).pdf](https://www.itu.int/en/ITU-D/Regional-Presence/Europe/Documents/Events/2020/Spectrum_EUR_CIS/Pavel%20Mamchenkov%20(1).pdf)

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CMJ would therefore welcome a fresh approach to the allocation of spectrum for this important step-change in wireless technology.

Question 2: Please comment on the relevance of these key influencing factors or provide others that you believe the Authority should be taking into account in developing a Revised 5G Spectrum: Statement of Intent?

The effect of delay caused by changes to the regulatory environment has to some extent been an advantage, allowing local operators to take into account changes in both technology and security requirements. CMJ hopes that this delay will enable a fresh and innovative approach to the deployment of 5G in the islands. In CMJ's view so-called early adopter advantage may have been a false start given the changes in network security requirements adopted by the UK and EU. As a new entrant, CMJ has none of the security issues associated with legacy networks.

Currently all spectrum in the Channel Islands is managed by Ofcom under an extension of the Telecommunications Act³ by Order in Council⁴. Consequently, Ofcom is obliged under international agreements to ensure co-ordination of existing spectrum allocations across its domains between the islands and the adjacent French mainland. CMJ has every confidence that Ofcom will ensure correct allocation and coordination in future provisions.

In fixed line market regulators have long observed that duplication of such networks is both costly and wasteful of resources, especially in cases where the incumbent has inherited assets from a former state monopoly. Instead, in most jurisdictions, some form of wholesale access is mandated. In some cases access to dark fibre is also required. Indeed, some regulators have considered mandating access to the incumbent operator's fixed line infrastructure in order to encourage competition and reduce the cost of backhaul. While wholesale fixed line access is available in Jersey, costs are still a significant barrier. For this reason CMJ would suggest that the same should apply to the mobile market. The introduction of 5G changes the nature of mobile in that it becomes a flat network based on IP, over which any type of service can be applied. In such a network innovative applications will use the majority of bandwidth while traditional voice and text will be incidental, though high priority traffic. At this point duplication of network infrastructure becomes an impediment to progress since the aggregated available bandwidth will be reduced in line with the number of operators competing.

Question 3: Please provide information on yourself or your organisation, and explain your interest in the awarding of 5G spectrum in Jersey.

Clear Mobitel (Jersey) Limited holds licences in both islands and has previously been allocated spectrum for the deployment of wireless services. CMJ is keen to deploy an all 5G network over which it can offer new and innovative services to users.

³ Telecommunications Act 2003. <https://www.legislation.gov.uk/ukpga/2003/21/contents>

⁴ Order in Council <https://www.legislation.gov.uk/uksi/2003/3197/schedule/2/made>

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Question 4: Taking into account the key influencing factors explained in this document, or others that you believe should be taken into account, please state if you are interested in applying for local 5G spectrum through the planned Restarted Process.

CMJ would clearly need to be involved in any process that the regulator decides to deploy in order to be able to develop its 5G strategy. As outlined above, CMJ hopes that a pragmatic approach is adopted.

Question 5: Considering the specific subject of pan-Channel Islands 5G spectrum alignment, please explain any particular challenges you anticipate if this is not achieved.

As outlined above CMJ has every confidence in Ofcom's spectrum management mandate and would not expect there to be any issues regardless of the timing of allocations in both jurisdictions.

Question 6: If interested in 5G spectrum, please state the services you would initially envisage providing or would like seen provided by others.

Aside from traditional voice and text CMJ has developed its own platform for the deployment of various real-time services including M2M, streaming, mobile broadband, IOT applications, mission critical applications, health, environment etc.

Question 7: If planning to provide 5G services, please state your ideal spectrum allocation requirement for providing them.

Clearly all operators would like the maximum amount of spectrum. CMJ would wish to be treated equally with the other licensees. 5G is a game changer and the incumbent operators have the drag of legacy to overcome. A new entrant can be nimble and provide innovation quickly.

Question 8: Are there any further points you would like to make or information you believe valuable and relevant to the Authority for taking into consideration during this consultation process?

The Channel Islands have a unique opportunity to deploy a world leading process for the deployment of 5G services. Spectrum should be utilized to its maximum extent and at the same time the environmental impact of infrastructure could be significantly reduced. For these reasons CMJ would be willing to participate in a full network sharing deal which would ensure the maximum available spectrum access for all operators. In due course all legacy network technologies will be turned off, leaving only LTE for a brief changeover while 5G handsets become commonly available. With the maximum available spectrum access, migration to future technologies will be simplified.

For the avoidance of doubt, this document may be published in its entirety.

Clear Mobitel (Jersey) Limited

Jersey Competition Regulatory Authority
2nd Floor Salisbury House
1-9 Union Street
St Helier
Jersey
JE2 3RF