



29th April 2022

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

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Dear Sir

### 5G spectrum award process

Thank you for the opportunity to provide further comment on your 5G spectrum award process: consultation to reassess interest and demand, in response to your questions:

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

**Home Net Ltd response:** Homenet's WiMax service provides home broadband services to more than 1,500 island homes, utilising spectrum JCRA are proposing to reallocate to new '5G Services', we strongly suggest these customers along with Homenet should not be disadvantaged by this process and spectrum already in use should be automatically awarded to the users of that spectrum. We have a significant concern that JCRA is proceeding with this consultation without meaningful dialogue with ourselves about the impact of potentially reallocating existing Spectrum Licences and consequently JCRA may be unaware of the consequences should it decided to reallocate existing Spectrum Licences. For the avoidance of doubt JCRA are advised that it is not economically viable to reconfigure the existing WiMax network to an alternative frequency. We strongly advise JCRA to reach agreement with parties affected by any spectrum reallocation prior to concluding this consultation

**Home Net Ltd confidential response:** Reallocating this spectrum will have a catastrophic impact on Homenet's business as it's not possible to reconfigure the existing WiMax network and the financial margin earned on wholesale products resold isn't sufficient to sustain the business.

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Home Net Limited  
Company Reg No: 67490  
Registered Office: Bramble Bank, Old Beaumont Hill, St Peter, JE3 7EA.

**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?

**Home Net Ltd response:**

- 2.1 Impact of delay:** *Uncertainty around the catastrophic reallocation of the spectrum is having a material impact on our ability to offer our services to new consumers and invest in new products and services.*
- 2.2 Loss of pan-CI requirements:** *We are content with the decision to focus solely on Jerseys needs but would prefer a pan island award.*
- 2.3 Loss of early mover advantage:** *Agreed*
- 2.4 Evolving high risk vendor (HRV) requirements:** *Homenet is aware of the requirement with respect to HRV and will comply with the guidance and the law in place.*
- 2.5 Recognition of deployment challenges:** *It is important to make sure that Homenet's current allocated spectrum is not "tinkered with" and that the allocation of the 5G spectrum to Homenet will allow a smooth migration of its own network and customers into 5G.*

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

**Home Net Ltd response:** *Home Net Limited have a Class II licence issued by the JCRA and provide information annually and on an ad hoc basis to the authority. Homenet respectfully requests the authority review historically submitted information as a basis of this response. The authority is aware that Homenet have a loyal customer base who value our cost-effective services. Looking forward Homenet is looking to invest and deploy 5G mobile services to enhance its existing fibre product being the only true independent alternative to JT.*

**Home Net Ltd confidential response:** *Should JCRA determine by reallocating the existing spectrum that these services can no longer be offered we along with our customers need time to migrate them to new services. It is not economically viable to rebuild the existing WiMax network to operate on a different frequency band.*

**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.

**Home Net Ltd response:** *Homenet are interested in applying for additional 5G spectrum, believing*

- *Existing spectrum in use should not be reallocated, it should be excluded from the reallocation process.*
- *The award process should not be skewed against small operators, inhibiting creativity and innovation.*
- *Spectrum allocation should be priced in such away as to only cover administrative costs, rather than be an additional tax on the consumers. In*

*particular Homenet feels strongly that the priced demanded by either approach will make its WiMax services uncompetitive and will remove this customer choice from the marketplace. JCRA are urged to carefully consider its policies and actions which effectively remove low-cost services from the marketplace.*

**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.

**Home Net Ltd response:** *Homenet would prefer that 5G spectrum allocation to be pan island.*

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

**Home Net Ltd response:** *Homenet are happy to partner with the Jersey & Guernsey Government to assist them in achieving their policy objectives. In addition, Homenet wishes to provide high speed mobile access ana mobile voice services, as well as low cost, 5G Broadband services.*

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

**Home Net Ltd response:** *Currently Homenet use the following spectrum 4x 10MHZ channels, 2 channels are on the lower band of the 3.4 to 3.6 GHZ band and 2 channels are on the upper band*

- 3.485 -> 3.48 to 3.49 -> 10MHZ
- 3.495-> 3.49 to 3.50 -> 10MHZ
- 3.585-> 3.58 to 3.59 -> 10MHZ
- 3.595-> 3.59to 3.60 -> 10MHZ

*Looking forward Homenet is interested in the allocation of the 700Mhz if this is included in the allocation process, obviously as stated above it is essential that the 3.4 GHZ spectrum remains allocated to Homenet, enabling it to provide current and new services.*

**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?

**Home Net Ltd response:** *We wish the authority to give very careful consideration to our concerns raised in our responses to the questions above.*

We trust you find our comments of assistance and please do not hesitate to contact me if you require clarification or have any further questions.

Yours faithfully

Ian Ridgway - Director

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