

Jersey Airtel Limited's (JAL) response to Jersey Competition Regulatory Authority (JCRA) Case T-064
(T-064: 5G Spectrum Award – Draft Invitation to Tender (ITT) Process - 28/06/2022)

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Jersey Airtel Limited

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1.0 Response to Question no. 1:

Question 1: Do you have any comments on the proposed 5G spectrum award tender and licensing process and timetable?

- 1.1 JAL appreciates JCRA's approach to 5G spectrum award tender, licensing process and timetable.
- 1.2 Given the small size of market, JAL requests JCRA to withdraw 'Limited Service Package' for private industry as it will limit the opportunities for OLOs and inflict pressure on the viability of significant multi-million-pound investment made in to 5G.

2.0 Response to Question no. 2:

Question 2: Do you have any comments on the proposed 5G spectrum award ITT terms and conditions?

- 2.1 JAL broadly agrees with the proposed 5F Spectrum award ITT terms and conditions, however, request JCRA to clarify following queries:
 - 2.1.1 Does the total fee mentioned in 7.2 (a) & (b) i.e. £80,000 includes fee for mitigation of spectrum interference? Will there be any other fee applicable?
 - 2.1.2 Is the reference to designated deadline date in 7.3 (b) same as stage 2 timeline in 6.1?

3.0 Response to Question no. 3:

Question 3: Do you have any comments on the proposed 5G spectrum award tender contents?

- 3.1 Since JCRA's intent is to allocate only 40MHz in '3.4GHz to 3.8GHz band' in the initial phase to each OLO, JAL requests JCRA to clarify and confirm how the future allocation from the 3.4-3.8 MHz spectrum band will be contiguous. Absence of contiguous band allocation will pose a serious challenge to get a radio unit that supports complete 400MHz of spectrum.
- 3.2 Considering current mast heights and planning processes, JAL requests JCRA to clarify how much RF radiation will be allowed for 5G in 3.5GHz & 700MHz bands to comply with the EMF/ RF radiation levels.
- 3.3 Request JCRA to shorten 'at least 5 years' time period to defragment the local 3.4-3.8 MHz spectrum band as per 8.2 (d). 'Enhanced Mobile Broadband service' can't be launched given the absence of defragmented 3.4-3.8 MHz spectrum.
- 3.4 Request JCRA to clarify on annual fee for holding the spectrum bandwidth in 700 MHz and 3.4-3.8 GHz respectively. Will it be fixed cost per MHz model?

4.0 Response to Question no. 4:

Question 4: Do you have any comments on the proposed 5G spectrum award tender evaluation and selection procedure?

- 4.1 JAL agrees with the proposed 5G spectrum award tender evaluation and selection procedure, however, JAL requests JCRA to clarify the criteria to measure 20% for consistency and 60% for credibility score.