



Clear Mobitel (Jersey) Limited
Clear Mobitel (Guernsey) Limited

Directory Information Services: strategic review of
regulation

Case T-037

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Introduction

The fixed line market in Jersey is largely dominated by the former incumbent Jersey Telecom ('JT'). Since privatization JT has continued to publish a printed Telephone Directory and dial-up enquiry services as well as maintaining an on-line search facility for telephone numbers through its website¹, however in recent editions it has only published or made available on-line its own hosted numbers. This has meant that consumers utilizing JT's rivals' services whether using Wholesale Line Rental or mobile telephone provisions are disenfranchised.

Response to Consultation

Question 1: Do you have any comments on the Authority's plan to carry out a review of local Directory Information Services?

Directory Enquiry ('DQ') services were reorganized by Ofcom in 2003 and traditional free to use DQ number (192) was shifted to paid-for services styled as 118XXX and were available for competitive 'value added' services to use. These numbers varied in cost and facilities offered and enabled consumers to make choices as to how they would use these providers.

However, since that time technology has changed significantly and consumers rely less on dial-up DQ in favour of using on-line directories or web searches to find numbers. Since mobile phones both store and display numbers, consumers have less need to remember or look-up regularly called numbers and thus the requirement for DQ has diminished.

It is therefore pertinent to examine the present arrangements of DQ services.

Question 2: Do you have any comments on the Authority's definition of Directory Information Services for the purpose of this review?

The services identified in the consultation paper cover the options currently offered by JT. JT has a preferred provider for its DQ but consumers have a choice of several others in the 118XXX number range. Alternative on-line services are also available. The Authority has not commented on the availability of general web search services.

¹ <https://www.jtdirectory.com/whitepages>

Question 3: Do you have any comments on local Directory Information Services and whether or not the island is well-served by the present range available?

It is interesting to note that JT's current licence places no obligation on it to provide a paper directory although it has continued to print and distribute one since privatization.

As observed above, JT does not include its rivals' customers in its own service, in this respect it falls short of expectations.

There are alternative on-line 'white pages' offers identified. It is also pertinent to observe, however, that while JT's own on-line directory omits its rivals customers, the service offered by BT² does include them.

Question 4: Do you have any views on the importance or otherwise of maintaining Directory Information Services within the island, now or in the future?

While JT's service falls short of expectation, there appears to be no reason for maintaining a local service that is not inclusive. This is in the light of other alternatives being made aware and available to the public.

Should JT continue to provide its current directory for its own commercial purposes, the JCRA should direct that it is fit for purpose.

Question 5: Do you have any views on the existing regulation relating to local Directory Information Services and its suitability for present and future regulatory purposes?

There is certainly some ambiguity in the licence conditions, however, originally JT did include its rivals customers in its service and printed directory. It is not clear whether this change was sanctioned by the Authority.

Question 6: Do you agree the Authority's duties under the law require it to carry out the planned review. If not please set out your reasons why and propose any alternative approaches you believe the Authority should take.

The law does require the JCRA to review the telecommunications market which gives the Authority a broad remit.

²<https://www.thephonebook.bt.com/person/>

Question 7: Do you have any comments on the Authority's planned purpose and approach in carrying out a strategic review of local Directory Information Services?

A review of the DQ service is relevant. In so doing the Authority should ensure that it has a thorough understanding of the use of DQ services. This should be done via a public survey to incorporate the views of the public that do not normally respond to consultations such as this.

It would be interesting to understand the relevance of a printed directory in the 21st Century, some 100 years after the appearance of the original paper directories.

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

Clear Mobitel (Jersey) Limited

JCRA
2nd Floor, Salisbury House
1-9 Union Street
St Helier
Jersey
JE2 3RF