

## Sure's response to the JCRA's Call for Information re 'Directory Information Services: strategic review of regulation' (Case T-037)

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

It is clear that the behaviour of customers has changed in recent years, with regards to their use of Directory Information Services (DI Services). The traditional logic of customers being reliant on telephone numbers to phone each other has been eroded in recent years, through the development of other communication technologies (e.g. Teams, Messenger and many other forms of Over-The-Top services).

DI Services have become largely commercially driven, with the creation of them based on the demands for the advertising associated with them, or in the particular case of 'telephone directory enquiries', through the often highly priced connection and/or pence per minute charges. These high charges are applied at the wholesale level and local operators are therefore required to pass these charges on at the retail level.

With an ever-increasing number of islanders choosing to be ex-directory (i.e. for their number not to be publicly displayed in any format), even those customers who rely on a paper or online local directory may well be unable to find numbers of individuals that they are seeking to contact.

It is therefore helpful for the JCRA to consider to what extent DI Services still provide a relevant facility for local users.

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

We agree with each of the definitions set out by the JCRA.

In addition, whilst likely to remain outside of the JCRA's direct review, we note that web searches (e.g. using Google or Bing) and social media platforms have become key sources of contact information for businesses and consumers who choose to share such details online.

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?

The small nature of the local market, and generally smaller business size (compared to most other DI Service providers), is likely to make the production of a local directory with paper and online services an economically viable activity – certainly there is a high potential for this, compared to the UK. JT therefore has the commercial incentive to continue to produce its annual paper directory, with that

associated benefit of being able to gain additional revenues from its online version<sup>1</sup>. Sure is not critical of this outcome, but it certainly encourages JT to continue to provide such services for the benefit of local businesses and island residents.

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?

For now, the directory is still an important resource for businesses to advertise in and for islanders to find those businesses, but certainly to a lesser extent than it used to be (for the reasons we set out in our response to Q1). Where customers would like their phone number(s) published, they should be able to do so online as a minimum, however Sure does not believe there should be an obligation on telecoms operators to provide these numbers by default.

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?

We note the JCRA's position, as set out in section 2.21 of its Call for Information and we view that clarity as helpful. Again, we support the JCRA's review of DI Services.

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.

We certainly support the JCRA's review, although we would not consider it to be a high priority topic.

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?

Both the purpose and scope of the review seem entirely reasonable to us.

**Sure (Jersey) Limited**

28/01/2022

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<sup>1</sup> [www.jtdirectory.com](http://www.jtdirectory.com)