



**Clear Mobitel (Jersey) Limited**

Defragmenting the 3.4-3.8 GHz spectrum band

March 2023

## Introduction

Clear Mobitel (Jersey) Limited ('CMJ') is a licensed telecommunications operator in Jersey and holds spectrum intended for deployment with 4G/5G technologies. CMJ currently holds an Ofcom spectrum licence in the 3400-3800MHz band.

## Response to Consultation

### General Comments

The market in Jersey currently supports 3 active mobile operators and one fixed radio operator. CMJ holds a licence and spectrum to operate in Jersey and intends to deploy 5G services.

CMJ also notes that there is currently a proposed merger between Sure and Airtel that would impact on future usage and distribution of spectrum. While the outcome of the merger is yet to be decided, CMJ is concerned that the market will be foreclosed unless firm measures are imposed by the regulator.

Nevertheless, in a small jurisdiction such as Jersey the density of data usage is much lower than in average European settings. Consequently given the spread of available spectrum there should be adequate for all.

### **Question 1: Do you support our provisional view that 5G spectrum is ideally provided in large contiguous spectrum blocks? If not, please explain why.**

For the provision of 5G services access to adequate bandwidth with TDD is necessary. The actual packages required will be dictated by the demand for bandwidth from the consumer. At this stage of development it is difficult to predict future needs as this will depend on the kind of services ultimately offered and required. 5G is best suited to low latency applications and it is difficult to assess the requirements for this within the islands as present policies are unclear. Nevertheless, CMJ agrees with the view that contiguous block are the best solution for the efficient provision of 5G services.

### **Question 2: Do you support our provisional view that the best method for defragmenting 5G spectrum is to potentially move existing historic licensees within the 3.4-3.8 GHz band or remove them? If not, please explain why.**

Currently as there is unallocated spectrum in this band and with potentially only one other obvious entrant CMJ is of the view that there is adequate available space to provide contiguous blocks for all likely users.

In order to achieve contiguous packages while working within the WT Act the proposed solution would seem to be the only one viable.

**Question 3: Do you agree with our approach to the legal framework relating to spectrum defragmentation and timetable for completion? If not, please explain why.**

CMJ understands the JCRA's mandate and its need to interact with Ofcom which has responsibility for spectrum within the islands. The timetable is dictated by the requirements of the WT act and the administrative duties of Ofcom.

**Question 4: Do you have any comments on our assessment of the need to defragment Jersey's 3.4-3.8 GHz spectrum band?**

There is certainly a need to defragment the band with the move to TDD deployment. 5G technology is a step-change in wireless technology and can be used for both mobile and fixed low latency high data density services. While recognizing that full service 100MHz blocks will be difficult to implement, CMJ considers that in the jurisdiction 60MHz contiguous spectrum packages would be a sufficient alternative.

CMJ notes that the potential merging of two existing operators it is difficult to anticipate a new entrant into the local market as the consultation suggests, unless it is intended to permit small operators to provide private 5G networks. In that case, however, the use of shared spectrum with low ERP would be indicated.

**Question 5: Do you have any comments about our proposed approach to defragmentation?**

Given the absence of spectrum trading in the islands and the need to work with Ofcom on matters of spectrum CMJ sees no other viable solution to defragmentation.

CMJ notes that this method process is lengthy but workable. CMJ would however not wish to see any existing licensees disadvantaged in the process. Existing bandwidth allocations should be at least replicated.

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

**Clear Mobitel (Jersey) Limited**

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