JT's Non-Confidential Response to JCRA Defragmenting the 3.4-3.8GHz Spectrum Band Consultation

(Case T-085)

24th March 2023

1 Introduction

JT (Jersey) Limited (JT) welcomes the opportunity to comment on the latest consultation from the Jersey Competition Regulatory Authority (JCRA) on the defragmentation of spectrum in the 3.4 – 3.8 GHz band ("the Consultation"). This is a non-confidential response and can be published in full.

2 JT's answers to the Consultation Questions

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

JT agrees that 5G spectrum is ideally provided in large contiguous blocks which is in line with the 5G spectrum assignments of other European nations[1], as well as following industry-recommended amounts for the contiguous 3.5GHz spectrum needed to deliver good-quality 5G services.

We completely agree with the statements made in paragraphs 2.11 to 2.22.

A restriction of available bandwidth to below 100MHz contiguous would be a severe impediment to JT's ability to ease network congestion and provide good-quality 5G services – ultimately disadvantaging Jersey's citizens, and causing performance, capacity and credibility issues for JT.

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.

JT supports the JCRA's view that the best method for defragmenting 5G spectrum is to move existing historic licences within the band or remove them. The allocations in the 3.41-3.8 GHz band have been structured to provide 3 x 100 MHz in the lower part of the band

[1] In the UK 390MHz has been allocated for 5G use, and all operators have assignments of at least 80MHz. In the Isle of Man contiguous 100MHz blocks have been assigned to each of the three MNOs (3410–3510MHz, 3600–3700MHz and 3700–3800MHz). Across mainland Europe, the vast majority of countries that have assigned 3.5GHz spectrum for 5G use have awarded at least 80MHz of contiguous spectrum to each operator.

for the Full Service 5G operators with the top 90 MHz split into 3 allocations of 30 MHz each for smaller scale / private operators. This structure is ideally suited to cater for the requirements of the Full Service operators who require 100MHz contiguous spectrum and for the smaller operators who only require 30MHz due to carrying lower levels of traffic and offering service in a limited area of the island.

The structure of the 3.41-3.8 GHz band only works if the existing historic licences are moved into the upper band or removed.

JT agrees with the approach laid out in the Consultation and the steps required for the JCRA to carry out a fair process. Ideally, we would prefer a shorter timescale to minimise the time the Full Service 5G operators have to run services with restricted bandwidth.

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

As outlined in our answer to question 2, JT completely agrees with the assessment of the need to defragment Jersey's 3.4-3.8 GHz spectrum band. This will enable provision of the required spectrum to three Full Service 5G operators as well as provision for three Limited Service operators.

Question 5: Do you have any comments about our proposed draft approach to defragmenting Jersey's 3.4-3.8 GHz spectrum band?

JT agrees with the JCRA's proposed approach and has the following comments regarding the existing three operators with historic licences:

Sure: Our expectation is that they would relinquish their historic licence as they have been successful in obtaining a Full Service 5G allocation.

Clear Mobitel: As they have not deployed an operational network we see no reason why a change of allocation should cause them an issue and should they have no future deployment plans we would expect them to relinquish any requirement for spectrum in the 3.4-3.8 GHz band.

Newtel: Our generic understanding is that Wimax equipment is designed to work within the full spectrum band 3.4-3.8 GHz and is able to operate in both FDD and TDD modes and

therefore the allocation within the band can be changed allowing them to continue to offer services. However we do appreciate that the implementation of changes within the 3.4-3.8 GHz band will require engineering work which may impact users during planned works.