

JT's response to JCRA's Call For Information Spectrum Strategy (T-105)

30 May 2025

1. Introduction

JT (Jersey) Limited (“JT”) welcomes the opportunity to respond to the JCRA’s Call for Information T-105 (the “CFI”). JT support the JCRA’s forward looking approach to reviewing spectrum policy to ensure that the principals guiding allocation and licencing remain up-to-date and aligned to the dynamic nature of the telecommunications markets. This approach is important as it provides regulatory predictability and legal certainty to market players.

2. JT’s response to the CFI Questions

Question 1. Do you have any comments on the Authority’s plans to develop a local spectrum strategy and proposed approach?

JT supports a spectrum strategy based around the needs of the local market, however importantly the local spectrum strategy needs to have regard to our neighbouring markets and the wider spectrum developments in the UK market. As the JCRA is aware, the local mobile network operators (MNOs) also operate networks in Guernsey and spectrum allocations need to align between Jersey and Guernsey for both technical and efficiency reasons. It is usually preferred that spectrum is allocated in tandem to allow roll out of services across the Channel Islands as MNOs generally standardise their offering over both markets for technical and simplification reasons. It is also important that spectrum allocations are aligned with the UK market where specific use cases have been identified, and these are relevant to the local market. In addition, co-ordination is necessary with France to minimise interference and Memorandum of Understandings are in place between Ofcom and the Agency Nationale des Fréquences to ensure this.¹

JT supports following the 3GPP² technical spectrum recommendations/standards ensuring interoperability between devices/equipment from different manufacturers enabling seamlessly connectivity to mobile networks worldwide.

¹ [International coordination - Ofcom](#)

² [3GPP – The Mobile Broadband Standard](#)

Question 2. Do you have any comments on the Authority's updated spectrum objectives?

Ref	Original CICRA spectrum objective	New JCRA spectrum objective
1	To promote competition as a mechanism to further its consumer interest objective	To promote competition as a mechanism to further its consumer, market and economic interest objectives
2	To further consumers' interests in the short and long term, having regard to prices and costs, and the availability and range of services suitable to consumers' different needs	To create value for Jersey through focus on the short and long-term interests of consumers and organisations, having regard to prices and costs, and the availability and range of services suitable to different local needs.
3	To seek to ensure the processes and criteria adopted by CICRA are consistent with Ofcom's duties, including the duty to secure the optimal use of wireless telephony of the electromagnetic spectrum	To seek to ensure the processes and criteria adopted by the JCRA are consistent with Ofcom's duties, including the duty to secure the optimal use of wireless telephony of the electromagnetic spectrum.
4	To have regard to and, where it lies within its powers and is practicable, to lessen the impact of the spectrum dependent activities it regulates on the environment	Work with Guernsey where possible for economic benefits and to prevent harmful interference through aligning spectrum licencing across the Channel Islands.
5	To the extent allowed by legislation, to deal with the Jersey and Guernsey Bailiwicks as a single economic and social entity	

JT agrees with the JCRA spectrum objectives detailed in the table above. However we believe it is important to have an objective aligned to ensuring sustainable markets and we suggest that objective 1 be changed to "*To promote sustainable competition as a mechanism to further its consumer, market and economic interest*". It is important that the JCRA's objectives include consideration of the costs and benefits of the licencing options ensuring that the longer term impacts and investment incentives are considered ensuring sustainable competition.

Original objective 4 included a requirement to ensure that the impact on the environment was considered. This is missing from new objective 4 and we believe it is important to have an objective that ensures the environment is considered and protected. For example, extensive coverage obligations imposed on all licences may lead to costly duplication of network infrastructure leading to over build which will be detrimental to the environment. An environmental objective would ensure alternative

ways in which spectrum coverage obligations could be achieved, for example including sharing obligations in the allocation process, thereby lessening the environmental impact³.

Question 3. Do you have any comments on the Authority's approach to retaining a close alignment between spectrum decisions in the UK and Jersey?

JT agrees that it is important that the Authority retains a close alignment with Ofcom who have the expertise and resources necessary to ensure efficient spectrum management. JT agrees that it is appropriate that spectrum decisions in Jersey, in the main mirror Ofcom's, taking into consideration the local market size and dynamics.

Question 4. Do you have any comments on Government of Jersey policies or expectations relating to the future licensing and management of local spectrum?

Category	GoJ Input
Economic	Consider the economic benefits for Jersey, both general and sector specific. The latter could include ensuring spectrum is available and licenced to allow improved site specific largescale operations, such as port activities, or application specific, such as freight tracking.
Innovation	Consider and support local sectors that may benefit from access to spectrum for trials, particularly those focused on areas in which Jersey has a natural or competitive advantage, with the 2024 drone trial being an example. Also consider innovation in how local licensing and management approaches could help promote opportunities for local service and application trials
Environment	Taking the experience of other jurisdictions into account, consider the need to protect Jersey's natural environment through minimising the impact of telecoms infrastructure such as masts while ensuring efficient new network rollout or upgrades. This may involve considering and recommending changes to planning and other regulations that may restrict the optimum use of local spectrum.
Investment	Consider how the approach to spectrum allocation can encourage and support present and future telecoms provider investment in network and services. This includes enabling 5G network launch and roll-out, considering satellite communications spectrum requirements and ensuring a smooth path to future technologies such as 6G.
Ubiquity	Consider the need for ubiquitous mobile coverage to help meet the expectations of Islanders using their devices to remain informed, in touch and connected from both a personal and professional perspective.
Efficiency	Consider spectrum as a valuable and scarce resource, ensuring key bands are not left unassigned or unused. Take appropriate steps to manage spectrum allocation in a way that is effective for the timely development of new services and efficient in maximising the use of available spectrum. This encompasses present activities to sunset certain existing mobile technologies, such as 3G, and reuse the spectrum for newer services and applications.

³ [spec best practice ENG.pdf](#)

Fees	Consider the principle of fair and consistent approach to spectrum licence fees across allocations, ensuring that principles adopted for Jersey do not prevent the efficient and effective use of spectrum to support economic growth, network investment and wider mobile coverage.
Consumer	Consider local telecoms law duties requiring the Authority to protect the short and long-term interests of local users, who will benefit from Island-wide, modern mobile networks with metrics established to measure quality. Steps taken to limit potential harm are important, such as accidentally roaming onto networks of adjacent jurisdictions while in Jersey.
Alignment	Consider strengthening the Authority's alignment and relationship with Ofcom, which has an important legal and advisory role in the licensing and management of local spectrum. Where appropriate, extend this aligned approach to other relevant regulatory organisations such as the EU.

JT agrees with the Government of Jersey's policies and expectations relating to the future licencing and management of spectrum. However, as well as minimising the environmental impact of telecoms infrastructure such as masts, focus should also be on ensuring that infrastructure is deployed in an efficient and sustainable manner. The telecoms strategy for Jersey recommended five policy principals, two of which are relevant to spectrum policy:-

- *adopting policies to encourage mobile network sharing and rollout of mobile next generation technologies such as 5G.”⁴* This policy is important however it is not referenced in the table above and we believe it should be.
- *“Ofcom continuing spectrum management, and Jersey coordination with the UK and Guernsey on the delivery of specialised services such as TETRA”* This policy point is addressed at Q 3.

Question 5. Do you have any views or comments on future demand for local spectrum and steps that should be taken to ensure these are met?

Enhanced mobile broadband (eMBB) has been at the centre of business cases for future spectrum across the world and will continue to be a use case in Jersey. In addition, additional spectrum will be required to maintain existing data quality levels. The alternative would be network densification which would not be efficient as well as having adverse environmental impacts. In addition, we anticipate demand for spectrum for private network usage such as Edge networks from the utilities sector going forward.

⁴ [A telecoms strategy for Jersey](#) – section 4 - policy recommendations

The universal availability of fibre to the premises (FTTP) in Jersey, with guaranteed speeds up to 1Gbit/s, means that there is limited demand for a 5G fixed wireless access (FWA) service at this time but demand could be possible over the longer term.

Demand could come from a variety of sectors such as:-

Sector	Potential Use Case
Health	The benefits of ehealth such as remote health consultations, remote/robotic surgery, and real-time monitoring and analysis have been widely discussed.
Security	Video streaming for public safety and security
Sensor network	Combined real-time public services and sensor networks (e.g. utilities, traffic control, lighting,
Fleet Management	Intelligent fleet management/dispatch for emergency vehicles and public transport.

Question 6. Do you have any views or comments on the optimum local approach to opening-up the 3.8-4.2 GHz band in Jersey?

JT will be interested in using this band in the future as an addition to the 3.4-3.8GHz band in order to provide additional network capacity and potentially for private network access.

Question 7. Do you have any views or comments on the local approach to designating the mmWave band in Jersey and on the appropriate timing for an allocation and licensing process?

Due to the technical limitations of mmWave in terms of coverage, it is unlikely that there will be a high demand for mmWave deployments, however in certain circumstances and market segments there could be viable use cases for MNOs. Where use cases evolve as the market matures we may have requirements for this spectrum.

Question 8. Do you have any specific interest in the historically unallocated and unlicensed local spectrum allocations in 2G/3G/4G bands between 800 MHz and 2600 MHz, or views or comments on the ideal future regulatory approach towards them?

There may be requirements for the unallocated spectrum for private networks and we recommend that the JCRA follow Ofcom's approach to allocation for shared access.

We may have interest in the 1400 MHz band in the future in order to provide any additional network capacity required.

Question 9. Do you have any specific interest in the currently unallocated and unlicensed local 5G Full Service or Limited Service spectrum packages, or views or comments on future regulatory approach towards them?

The GSMA benchmark for 5G high speed services is deployment of a minimum of 100MHz bandwidth in the 3400 – 3800 band. The initial limited offering to JT and Sure of 40MHz, with the possibility of moving to 60MHz and then 100MHz, after a defragmentation process, is suboptimal and means that consumers will not experience the benefits of the 5G service from launch and will in fact have a slower service on 5G than on 4G.

Now that the Sure/Airtel merger has been passed and there are only two MNOs in the market, JT recommends that the JCRA now confirm that they will only provide two Full Service packages in the 3400 - 3800 band. There is no value in phasing the allocation of 5G spectrum as it only serves to restrict the performance of the 5G service and therefore we recommend that the entire 3400 – 3800 MHz band be split between Sure and JT. In addition, it would improve network quality and capacity if the 700MHz band was split equally between JT and Sure. JT note the reference to additional 700Mhz spectrum (2x5Mhz allocations). If these are targeted for Supplementary Down Link then JT would suggest that these are included in the overall re-allocation of the band. If however, these are identified as PDDR, JT would recommend that these are reserved for potential future use cases that may arise with the local Emergency Services and future TETRA retirement.

3710 - 3800 is currently unallocated and was proposed for limited service that would now sit more appropriately in the 3.8 - 4.2 band. We therefore recommend that this 90 MHz of spectrum be allocated to JT and Sure.

Question 10: Do you have any specific interest in the current spectrum allocations licensed to Airtel that will become available for reallocation in the future, or views or comments on future regulatory approach towards them?

The market trend is for network consolidation, due to the high cost of maintaining and running mobile networks. The short investment cycles between mobile generation upgrades together with the increased costs that result from the telecoms security requirements and the removal of high risk vendors from UK networks (including the Crown Dependencies) increases the burden. Therefore the likelihood of a new mobile entrant into the market is diminished. We therefore believe that the spectrum allocations that were previously allocated to Airtel should be released for re-use by the existing MNOs.

JT experiences congestion in the low bands (in particular the 800 MHz 4G band) where spectrum is limited. The Sure/Airtel merger will release the Airtel allocated spectrum enabling the refarming of the Airtel spectrum. Refarming the Airtel spectrum and increasing the allocations to JT and Sure would enable each operator to improve network quality and performance. This approach will ensure that consumers continue to benefit from good quality mobile services.

Table 1 below details JT's proposal for the unallocated spectrum and refarming of the Airtel spectrum between the existing MNOs. JT considers that this proposal is practical to implement, with minimal reshuffling required and both Sure and JT will end up with equal allocations of spectrum overall, albeit not in each band. This approach has been adopted by the Isle of Man⁵, where the available spectrum has been shared between the existing MNOs.

⁵ [Isle of Man Allocations](#)

Table 1 – Spectrum Allocation Proposal

Jersey						
Usage	Band	Refarm	Downlink			
Available	700MHz		758.0	(30MHz)		788.0
Current	700MHz			10MHz	10MHz	
			758.0	768.0	768.0	778.0
JT Proposal	700MHz	Yes		15MHz	15MHz	
			758.0	768.0	768.0	778.0
Available	800MHz		791.0	(30MHz)		821.0
Current	800MHz			10MHz	10MHz	10MHz
			791.0	801.0	801.0	811.0
JT Proposal	800MHz	Yes		15MHz	15MHz	
			791.0			821.0
Available	900MHz		925.0	(35MHz)		960.0
Current	900MHz			10MHz	10MHz	15MHz
			925.0	935.0	935.0	945.0
JT Proposal	900MHz	No - Sure only		20MHz	15MHz	
			925.0			960.0
Available	1800MHz		1805.0	(75MHz)		1880.0
Current	1800MHz			20MHz	20MHz	15MHz
			1805.0	1825.0	1825.0	1845.0
JT Proposal	1800MHz	Yes		40MHz	35MHz	
			1805.0			1880.0
Available	2100MHz		2110.0	(60MHz)		2170.0
Current	2100MHz			5.3MHz	14.8MHz	14.8MHz
			2110.0	2115.3	2130.1	2130.1
JT Proposal	2100MHz	Yes		20MHz	30MHz	10MHz
			2110.0			2170.0
Available	2600MHz		2620	(70MHz)		2690
Current	2600MHz			20MHz	20MHz	10MHz
			2620.0	2640.0	2640.0	2660.0
JT Proposal	2600MHz	Yes		40MHz	30MHz	
			2620.0			2690.0
Available	3400MHz		3410	(390MHz)		3800
Current	3400MHz			40MHz	40MHz	
			3520.0	3560.0		3670.0
JT Proposal	3400MHz	No		150MHz	150MHz	
			3410.0	3560.0	3560.0	3710.0
						3800.0

Key
Airtel Vodafone
Jersey Telecom
Sure
Clear Mobitel
Available

Question 11: Do you have any views or comments on the other spectrum matters listed in Section 6 of this Call for Information or any others that should form part of the Authority's spectrum strategy?

2G/3G Switch off
JT plan to have switched off its 3G network by the end of 2025 and 2G is likely to remain into the 2030s.
Removing technical conditions from certain spectrum licences
JT fully support the removal of the technical conditions from older spectrum licences, namely JT's 900 MHz and 1800 MHz licences, in line with the approach adopted for the more recent spectrum licences. JT has made requests to Ofcom for the technical conditions of its 900 MHz and 1800 MHz licences to be removed and would request that these changes are made without further delay.
Review licence conditions relating to 4G
JT believes that coverage obligations can be important to ensure roll out to rural areas ensuring populations are not excluded and serve a purpose when full service licences are issued. However as the market matures and mobile networks are established, we would expect that the coverage obligations may no longer be necessary. This is because MNOs have incentives to ensure that network coverage and quality continue ensuring that they can continue to compete for customers. As markets mature, network quality and capacity are a bigger focus for MNOs to retain customers ensuring they continue to receive a good quality service. In Jersey, capacity is a bigger issue to the MNOs than coverage, and additional spectrum (as discussed in answer to question 10) is required to fulfil this.
Drone licencing
JT understand that the GSMA and 3GPP ⁶ are looking to allocate specific bands for drone control. We believe there may be scope in the future for wider drone deployment and therefore a specific licence for the use case with terms around use and any restrictions on use would be preferred.
Spectrum for utilities
JT anticipate that new IoT technologies to support utilities will become available as part of 5G rollouts (ie NB-IoT & Cat-M1) and therefore specific spectrum for utilities is unlikely to be a requirement in Jersey. We expect these use cases to evolve over time and we have no specific requirements at this time.
Spectrum for general satellite services
JT has no comments on spectrum for satellite services.

⁶ [Introducing 3GPP](#)

Regulatory framework for direct satellite to mobile handset connectivity
In the UK it is considered that D2D will likely be used to provide coverage in remaining “not spots”. This is not an issue to resolve in Jersey. However, one of the options being explored in the Ofcom consultation is the use of UK licenced MNO spectrum by partner Satellite providers to provide broad coverage across the UK. JT would request the JCRA seek clarification on the coverage footprint that this could provide, ensuring that this does not overlap with Channel Island jurisdiction, potentially causing interference with the CI allocated spectrum, or providing UK operators with coverage in CI outside of local regulation and potentially damaging to local operators.
Spectrum in the upper 1.4 GHz band
Specific use cases may evolve in the future however it is It is too early for us to assess if the 1.4GHz band may be of interest to us.
Proposals to allow dual technology access in the 6 GHz band
JT support following the standardisation of 6 GHz and consider that the Ofcom approach of sharing the band between mobile and Wi-Fi could be detrimental. JT do not have any use for this spectrum currently however we believe it would be wise to wait for the standardisation of this spectrum before considering any allocations.