

Sure Response to Telecoms Security Procural Guidance Consultation

1. This is the Sure (Jersey) Limited (Sure) response to the above consultation published on 26th January 2026. We welcome the opportunity to contribute to the Jersey Competition and Regulatory Authority (JCRA) consultation on this important area of work.

Question 1 – Do you have any concerns about the JCRA’s approach to preparing for the Government’s proposed changes to the Security Measures Order? If so, please explain what they are.

And

Question 2: Do you support the JCRA’s approach to potential modifications to its Draft Procedural Guidance? If not, please explain why.

2. We do not have any comments to make on the specific JCRA timeline set out in this consultation. We have set out our concerns on timing and resourcing separately to the Government of Jersey as part of its own ongoing consultation process.

Question 3: Do you have any specific comments on the potential modifications to the Draft Procedural Guidance contained in Annex A of this document?

3. The documents published by the Government of Jersey set out that the intent is for any burden of implementation of these security measures to be proportionate to the operator’s size. For example, *“Smaller Public Telecoms Providers are not specified in the Order and are not expected to follow the measures set out in the code of practice.”* (emphasis added) and *“The application of the Order and Code of*

*Practice reflect the differences in Jersey's Public Telecoms Providers' networks and services, criticality of the services provided, and their ability to bear the costs of security requirements and measures."*¹

4. We are therefore concerned on the proposed approach to rely on 'relevant turnover' merely to any relevant activity carried out wholly or partly in Jersey. This risks the policy intent not being carried out as it excludes those providers² operating at scale (potentially regional or global), but with a comparatively small local presence. These operators would have the ability to provide services essential for Critical National Infrastructure, and to absorb the costs of compliance.
5. An alternative solution would be consideration of relevant worldwide turnover or footprint, rather than simply limiting the scope to revenue generated in Jersey. This would ensure that new providers, with the ability and resources to comply with the Telecoms Security requirements are in scope, which we consider more accurately meets the intent laid out by the Government of Jersey.

¹ Page 17 of the Government of Jersey Consultation: Proposed Jersey Telecoms Security Order and Code of Practice

² An example of this would be Low Earth Orbit (LEO) satellite providers which may have modest turnover locally but significant turnover regionally or globally.