

## Sure Response to the Draft Spectrum Strategy Consultation

1. This is the Sure (Jersey) Limited (Sure) response to the above consultation published on 13<sup>th</sup> January 2026. We support the ongoing work of the Jersey Competition and Regulatory Authority (JCRA) in setting out a blueprint for an effective spectrum strategy for the island.

2. ✂

**Question 1: Do you agree with the JCRA's proposed approach to frequency allocations below 3.8 GHz as set out in Provisional Decisions 1-3? If not, please explain why and propose any alternatives.**

3. We support provisional Decisions 2 and 3 and are grateful to the JCRA for taking on board Sure's comments to the Call for Information (CFI).

4. We do not support provisional Decision 1, as we consider that an adequate assessment for demand for these frequencies can be inferred from the CFI process of May 2025. As a result, we believe that the JCRA is taking an overly cautious approach to procedure. Effectively, the JCRA is proposing that there will be three stages to determining demand (Call for Information, Consultation and formal application) for what is a relatively straightforward and uncontentious frequency allocation decision.

5. ✂. Unfortunately, the process that the JCRA is proposing is introducing unwelcome uncertainty. In particular, we are concerned that we will only receive firm confirmation on which frequencies we will be allocated to us after the Spectrum Strategy statement is published, which we expect to be during April.

6. We note from the CFI responses that Sure and JT are in broad agreement as to how the frequencies in the bands should be allocated. That being the case, we do not

consider that it is in the best interests of consumers for the allocation of these frequencies to be delayed in the way proposed in the JCRA's draft Strategy. In line with the JCRA's new objective of "aligning spectrum licencing across the Channel Islands" (which we strongly support) we would urge the JCRA, as the GCRA has done, to expedite the process of allocating spectrum in these frequencies so that Jersey customers can enjoy the benefits as soon as possible.

7. In this respect, we note the JCRA's ongoing commitment to making spectrum available to the benefit of consumers in the island. ✂

**Question 2. Do you agree with the Authority's proposed approach to frequency allocations above 3.8 GHz as set out in Provisional Decision 4? If not, please explain why and propose any alternatives**

8. We support the Authority's proposed approach.

Annex

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