Sure's non-confidential response to the Wholesale Broadband Price Control Non-statutory Final Decision

25th June 2026

1 This is the Sure (Jersey) Limited ("Sure") non-confidential response to the Jersey Competition and Regulatory Authority's ("the Authority") Wholesale Broadband Price Control non-statutory Final Decision, published on 27th May 2026.

2 We recognise that a wholesale provider must be able to recover their efficiently incurred costs. However, we consider this price change represents an unusually significant increase. We foresee potential negative implications for competition in the retail broadband market more generally. Without careful consideration, we are concerned that this could adversely affect price sensitive consumers hardest. Within our response, we suggest the Authority may want to consider whether there are ways to protect retail competition in this market.

3 We very much welcome the Authority's willingness to engage on such an important topic. There is a clear need for confidentiality in proposals of this nature and so we recognise that at times that all supporting evidence cannot be provided to OLOs. However, due the nature of this, it has created a lack of visibility of the scale of these cost increases. [✂] Should the Authority wish to discuss any of the points below in further detail we would be very happy to do so.

1.1 Need to protect price sensitive customers

4 We note the Authority's retail market consideration, as set out in Box 1 of the publication. We also appreciate the reference to concerns raised by Sure with regards to the pressure on retail pricing and limited scope to absorb price increases. Contrary to this, JT's position was that such an increase would not affect its own retail broadband offering. [✂]

5 The retail offerings from Sure, and JT in Jersey differ significantly. It is unsurprising that JT would not face the same retail pricing pressure given its current retail pricing."[1]. Importantly, there is no product in JT's offering aimed at low users such as single persons or light browsing only.

6 Sure introduced a low-priced entry-level broadband product[2] which we consider essential to addressing this gap in the market. This product allows for the more price sensitive consumers to gain access to a lower-speed broadband product at an affordable price. With an average wholesale price over the next price control period of £30.72, [✂]

7 Not only are these lower priced products fulfilling a need by providing consumers with additional choice, but they also provide competitive constraint on overall market pricing. [✂]

---

[1] With two offerings on the market, the first being 944 Mbps download speed and 94 Mbps upload speed priced at £64.80 aimed at "households with multiple devices and HD streaming". The other offering both upload and download speeds of 944 Mbps aimed at "gamers and professionals needing hyper fast upload and download speeds". Information correct as of 22nd June 2026: Post-paid 2025 - BROADBAND - JSY (Q3) - JT Global

[2] 100 Mbps broadband service priced at just £32 including the landline)

8 To minimise impact the on consumers currently subscribing to the lower priced products, the Authority may want to consider whether there are approaches that minimise the impact on consumers. One way this could be addressed is [✂]. Should the Authority wish to explore this further to assess viability, we would be happy to discuss in more detail.

1.2 [✂]

9 [✂]

10 [✂]

11 [✂]

1.3 Potential need for lower starting charge adjustment

12 Should the Authority determine that [✂]. As detailed in our earlier response on this topic, while the Authority's analysis is based on average wholesale price changes across the entire 5-year period, our retail pricing was determined according to the agreed glidepath. Actual collective wholesale price for Broadband and Landline currently is £24.51. A year one increase to £27 per port is a significant cost increase for a small broadband provider to absorb.