



Clear Mobitel (Jersey) Limited

**T-105 spectrum strategy
Call for information**

April 2025

Response to Consultation

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

Clear Mobitel (Jersey) Limited ('CMJ') fully understands the need to develop a spectrum policy for Jersey. The Channel Islands are small jurisdictions and have unique needs for spectrum. Given the geography and population the overall demands for spectrum are consequently less than in larger jurisdictions. To this end the JCRA should take a considered approach to the distribution of spectrum to ensure that there is adequate bandwidth available for future changes in technology that may require a more flexible approach.

Spectrum in each band should be allocated in such a way that there is sufficient flexibility for changes in technology and the possibility of new entrants offering services that are new and innovative and that are different from the current usages.

The Authority should take into consideration the retirement of current technologies and consider how best to reallocate spectrum currently used for these services. Ultimately all existing technologies will be replaced by future developments beyond 5G and thus a forward looking approach is necessary to avoid future problems. CMJ understands that certain spectrum is currently held by some operators on indefinite licence. This could have an impact on innovation in the future as the current services using that spectrum are retired.

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

CMJG agrees that spectrum needs to be used carefully in order to promote competition, innovation and consumer benefit. It is necessary to ensure that there is adequate protection of spectrum when working with neighbouring jurisdictions. In Jersey there are only two neighbouring jurisdictions, namely France and Guernsey. Therefore it should be relatively easy to ensure that interworking is protected from interference by close alignment between each jurisdiction.

The JCRA should be forward looking to ensure that spectrum is used efficiently to ensure progression to new upcoming technologies. While 5G is the current focus

6G is already in the pipeline and there will of course be further development of technologies. To this end the JCRA should be careful in allocations in order not to foreclose the market to new technologies, new services and new entrants.

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?

Given the small size of the Channel Islands and their proximity to France aligning with UK requirements does not necessarily seem to CMJ to be in the best interest of Jersey. There are only two jurisdictions with which spectrum coordination is necessary – Guernsey and France. Some of the spectrum usage decisions made by Ofcom relate to issues that are not present in the Channel Islands. However, given the long-standing legal arrangement with Ofcom and that it follows best practice elsewhere, CMJ is satisfied that at least for the time being that the approach is valid.

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

The government report cited in this consultation¹ is now more than seven years old and is a little dated with respect to technological and social changes that have impacted telecommunications over the last few years. Nevertheless, the report does have some solid policy recommendations that CMJ supports.

The report notes that: *'network competition (without any network sharing, in the case of mobile networks) is unlikely to be efficient or commercially feasible'*. CMJ has long promoted the idea of a mobile network infrastructure company owned jointly by the service providers. This would be a more equitable and efficient way of utilizing spectrum and be cost-based depending on the type of usage required by the service provider. This would allow more innovative services and be better able to react to changes in technology. It would also reduce the inefficient duplication of networks and physical infrastructure.

Many of the other recommendations in the report have already been addressed or are in train. The future focus should be on control infrastructure, security and innovation rather than on personal communications which will necessarily be addressed by future developments.

¹ Oxera report January 2018: A Telecoms Strategy for Jersey

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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?

Spectrum is a scarce resource and should be utilized sparingly and efficiently. The demands for spectrum are not as intense in the Channel Islands as they are in larger jurisdictions and thus in each band there should be allocations withheld for future use as technology evolves.

When allocating spectrum the Authority should always consider that emerging technology changes may be hindered by the lack of suitable spectrum. Early allocations have tied up large amounts of spectrum that is now unavailable for new entrants, perhaps inhibiting innovation and thus harming consumers.

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?

As outlined above CMJ urges caution on the over-allocation of spectrum to individual networks. This spectrum is currently being utilized for 5G services and is essential for its initial introduction. CMJ is of the view that since the Airtel-Sure merger that there should be sufficient spectrum in this band to support at least two new entrants if the spectrum is carefully managed.

Shared spectrum can also be used effectively for low to medium power applications. CMJ has an interest in Fixed Wireless Access ('FWA') which could utilize this form of allocation. Shared spectrum is also valuable for the development of 5G enabled secure private networks.

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?

The mmWave band is intended for close proximity small footprint use such as 5G enabled low latency systems for example industrial control, real time systems such as airport scanners and high definition real time video. A growing service is the provision of 5G enabled secure private networks. It can also be utilized for FWA where high bandwidth is needed such as in large stadiums where there is an

intermittent very high and intense demand for Internet access. It is not intended for general mobile applications.

Since such specialized applications are limited in extent, CMJ would suggest that allocation of spectrum in this band should be dealt with on a case by case basis.

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?

CMJ was originally allocated 2600MHz spectrum over which it proposed to develop 4G FWA. CMJ observes that regulators, including Ofcom, now take an agnostic view towards spectrum usage. Any of the bands currently used for specific technologies should be available for 5G and future systems. The lower frequency allocations have advantages in terms of their workable footprint and enable a more rapid deployment of new services. There are some limitations on workable bandwidth and perhaps latency depending on specific applications. CMJ would certainly be interested in the lower frequency packages as a late entrant into the local market.

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?

CMJ as a late entrant has a strong desire for spectrum allocations across the range. Both full allocations or shared spectrum would enable entry into the market.

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?

CMJ is keenly interested in any spectrum packages freed-up by the merger. CMJ would also be interested in acquiring the vacated site access and associated infrastructure which would enable a quicker route to market. The regulator should take steps to ensure that where sites are vacated that they remain available for future development through liaison with the local planning authority.

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?

CMJ strongly supports Ofcom's views on technology neutrality and the refarming of existing dedicated spectrum to other more advanced services.

CMJ also concurs with the Authority's view on existing licence conditions regarding 4G and network requirements. Moving forward there will be less reliance on traditional telephony and a greater demand for specialized broadband based services.

Drone based technology requires secure communications for safe operation and CMJ endorses the Authority's view on this matter.

While utility companies have a need for secure communications for monitoring and billing, CMJ is of the view that such services in the islands will be best served by network operators working as trusted third parties.

Satellite services are currently a growing sector worldwide whereby they provide services to areas poorly served by land based providers. CMJ does not perceive that this is likely to be a major factor in the islands given their small geographic size. CMJ agrees that the Authority should continue to monitor this sector so that it can react should there be any developments likely to affect local communications.

CMJ views the 1.4GHz spectrum as a fill-in to improve coverage in remote rural areas and low power indoor environments. While there may be a case in Jersey for use in indoor areas, the case for using it in rural areas would be difficult to justify given the existing widely available spectrum and cell coverage.

The current proposal for 6GHz is hybrid use between 5G and WiFi services in high usage areas such as inner-city areas. CMJ does not see any justifiable major use cases in Jersey given the relative demand density compared to a large city. However, such spectrum would be useful in small, high demand areas such as ports. The usage of this spectrum in other jurisdictions should be monitored by the Authority before any decision is made.

