



Clear Mobitel (Jersey) Limited

Draft Spectrum Strategy

February 2026

Response to Consultation

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.

Clear Mobitel (Jersey) Limited ('CM') broadly agrees with the proposed strategy for the re-farming of the spectrum released by the Airtel-Sure merger. However, CM would urge the regulator to ensure that there remains sufficient available spectrum for the potential entry to the market of new operators offering new services such as private 5G and data intensive applications such as traffic management agricultural services and health applications among others.

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.

CM again broadly agrees with the proposal. The JCRA should nevertheless ensure that any such allocation is demand led and fully justified to ensure that existing operators do not simply sit on spectrum to frustrate competition.

Jersey is a small jurisdiction with a small population yet has the same potential spectrum allocations as countries with more operators and more demand for spectrum in denser populated city areas. CM is of the view that there is more than enough spectrum available to enable existing incumbents to develop their future network strategies without depleting the available bandwidth to forestall entry of potential new operators and new innovation. It is incumbent on the JCRA to exercise prudent husbandry when making spectrum allocations.

For the avoidance of doubt, this document may be published in its entirety.