



Telecommunications (Jersey) Law 2002

Case T-076 - Initial Notice:

Proposed Licence Modification affecting:

Class III Licence: JT (Jersey) Limited

Class II Licences: each of Base Limited t/a Genesis AV;
Home Net Limited; Jersey Airtel Limited;
Newtel Limited; Offshore Leisure Limited;
Starlink Internet Services Limited and
Sure (Jersey) Limited

Class I Licences: each of Arqiva Limited; BT Jersey Limited;
Gamma Telecom Holdings Limited; Jersey
Electricity PLC; Loober Ltd and Nitel
Limited

Document No: JCRA 25/15

Date issued: 15 July 2025

Deadline for representations: 17:00 on 14 August 2025

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1. Executive Summary

- 1.1 The Jersey Competition Regulatory Authority (the **Authority**), is issuing this Initial Notice of its intention to exercise a specified regulatory function to modify the following licences¹ issued under the Telecommunications (Jersey) Law 2002 (the **Telecoms Law**), being licences to run telecommunications systems and provide telecommunications services within, to and from the Bailiwick of Jersey:

Licensee	Class	Issued/re-issued	Referred to as
JT (Jersey) Limited (JT)	III	07/07/2023	JT Licence
Base Limited t/a Genesis AV (Genesis)	II	04/07/2024	Genesis Licence
Home Net Limited (Homenet)	II	27/01/2024	Homenet Licence
Jersey Airtel Limited (Airtel)	II	07/07/2023	Airtel Licence
Newtel Limited (Newtel)	II	07/07/2023	Newtel Licence
Offshore Leisure Limited ² (Co-op)	II	02/08/2024	Co-op Licence
Starlink Internet Services Limited (Starlink)	II	03/05/2024	Starlink Licence
Sure (Jersey) Limited (Sure)	II	07/07/2023	Sure Licence
Arqiva Limited (Arqiva)	I	20/07/2024	Arqiva Licence
BT Jersey Limited (BT)	I	19/12/2024	BT Licence
Gamma Telecom Holdings Limited (Gamma)	I	04/01/2017	Gamma Licence
Jersey Electricity PLC (JEC)	I	02/09/2023	JEC Licence
Loober Ltd (Loober)	I	28/08/2018	Loober Licence
Nitel Limited (Nitel)	I	08/03/2023	Nitel Licence
collectively referred to in this Initial Notice as the Licensees and the Existing Licences .			

- 1.2 Each of the JT Licence, the Airtel Licence and the Sure Licence is published on the Authority's website in a non-confidential version, with a schedule redacted. None of the modifications set out in this Initial Notice affects that schedule in any of such licences. Should the modifications come into effect, the Authority will again publish non-confidential versions of each licence.
- 1.3 The proposed modifications will take the form of:
- (a) the introduction of new defined terms, in each case in Condition 1.1 of each Existing Licence;
 - (b) the addition of a new Condition relating to 'Numbering' to certain Existing Licences; and
 - (c) the addition of provisions to the Condition relating to 'Numbering' in each Existing Licence

¹ Each of these licences in its current form is available at the Authority's website [here](#) and can be viewed at the Authority's offices, on application.

² Offshore Leisure Limited is a wholly owned subsidiary of the Channel Islands Co-operative Society Limited and has expressed its intention to launch a mobile service in Jersey under the 'Co-op' brand

as each is set out in the **Schedule** to this Initial Notice. As the numbering of the various Existing Licences is not consistent, the Schedule sets out the relevant Condition numbers for each Existing Licence.

- 1.4 This Initial Notice sets out the intention of the Authority to exercise such specified regulatory function. In due course, the Authority may issue a Final Notice or a fresh Initial Notice if responses are received, following the process outlined in Article 11 of the Telecoms Law.

2. Background and structure of this Document

- 2.1 Global Titles (**GTs**) are 'routing address[es] for the exchange of signalling messages both within and between mobile networks, to support the provision of mobile services (e.g. for call routing and SMS delivery while roaming abroad)'³. In the UK and the Crown Dependencies, GTs are derived from the +44 numbers allocated by Ofcom to, inter alios, a number of the Licensees.
- 2.2 On 13 September 2024, following discussions between the Authority and Ofcom⁴, the Authority published a '[Letter to mobile operators](#)' and an '[Information Note](#)', in respect of a consultation by Ofcom. This consultation was in relation to the perceived harms arising out of the leasing and sub-leasing of GTs and Ofcom's intention to prohibit such activities. The Authority stated that it was 'minded to modify the [Existing Licences]' to impose the same prohibition in relation to Jersey, if, following the consultation, Ofcom determined to impose the prohibition on UK operators.
- 2.3 On 22 April 2025, Ofcom published its '[Statement on Global Titles and Mobile Network Security \(Statement\)](#)' together with:
- (a) updated '[General Conditions of Entitlement](#)'⁵ (**Conditions**);
 - (b) updated '[National Telephone Numbering Plan](#)' (**Plan**); and
 - (c) updated '[Guidance for Number Range Holders to prevent misuse of Global Titles](#)' (**Guidance**).
- 2.4 In the Statement, Ofcom reaffirmed its view that 'bad actors' with access to GTs could undertake a range of harmful activities⁶. It stated that:
- 'The consensus among cyber security specialists is that GT leasing is a major security threat to mobile networks because it has made it easier for an expanding number and different types of operators to get access to GTs. This has enabled bad actors to gain access to the global SS7⁷ signalling network and has significantly increased the incidence of harmful signalling activities.'*⁸
- 2.5 Accordingly, in the Statement⁹, Ofcom stated that it had determined to (inter alia):
- (a) 'ban leasing of Global Titles to third parties by operators that hold UK mobile numbers';
 - (b) 'strengthen [its] rules to prohibit the misuse of Global Titles by any operator that holds UK mobile numbers';

³ Statement: para 1.2

⁴ Ofcom is the UK's regulator of, amongst other things, telecommunications and was established under the Office of Communications Act 2002 and regulates telecoms under the Communications Act 2003.

⁵ The link is to Ofcom's published unofficial consolidated version of the Conditions

⁶ Statement: para 2.10

⁷ SS7 is a signalling protocol used by mobile operators to route calls, using GTs

⁸ Statement: para 2.19

⁹ Ibid: 'Our decisions – in brief', p4

- (c) ‘publish new Guidance for number range holders on their responsibilities to prevent misuse of their Global Titles and to strengthen our rules to prohibit the misuse of Global Titles by any operator that holds UK mobile numbers’; and
 - (d) ‘strengthen [its] rules to prohibit the creation and use of Global Titles from numbers not allocated for use’.
- 2.6 These determinations were reflected in the Conditions, the Plan and the Guidance. The ban came into effect immediately in respect of new leases of GTs and 12 months later in relation to existing GT leases¹⁰.
- 2.7 The Authority notes Ofcom’s decisions in relation to UK GTs and its reasoning, including the point made in paragraph 4.2 below. The Authority has decided to apply the same prohibitions on the Licensees, by way of modification of the Existing Licences. The definitions and provisions set out in the Schedule are derived from the Conditions and the Plan, and take account of the Guidance.
- 2.8 The Authority wrote to the three Jersey mobile operators (Airtel, JT and Sure) on 28 May 2025 to inform them of the Authority’s decision. One of the operators responded in writing and officers met with representative of all three. Please see Section 4.
- 2.9 This document is structured as follows:

Section 3	Outlines the legislative and licensing basis for this Initial Notice
Section 4	Summarises non statutory discussions with mobile operators
Section 5	Sets out the next steps

3. Legislative and Licensing Background

- 3.1 In its role as telecoms regulator the Authority regulates providers of telecommunications services, pursuant to the Telecoms Law. It also regulates other entities in Jersey, which are not relevant to this Initial Notice.

Licensing of telecommunications systems and of +44 numbers in Jersey

- 3.2 Under Article 14(1) of the Telecoms Law, the Authority has the power to issue licences ‘for the running of any telecommunications system specified in the licence’, and the Existing Licences were granted pursuant to such power.
- 3.3 Ofcom is responsible for the Plan, which also applies to number ranges it issues to operators in the Crown Dependencies (**CDs**). As Ofcom states, where it has issued +44 numbers to CD operators, ‘it has done so on behalf of each CD regulator’¹¹, that is, in respect of Jersey, the Authority. Ofcom regulates the use of +44 numbers in the UK by way of provisions in the Conditions. However, Ofcom ‘cannot issue or enforce any new rules on the use of +44 GTs based on +44 numbers allocated to CD operators’¹².
- 3.4 Most of the Existing Licences contains conditions relating to ‘Numbering’. These conditions do not relate to the use of GTs. Where such provisions are absent, the Authority intends to introduce them into the relevant Existing Licences. The Authority intends to modify such conditions in all Existing Licences, and to introduce defined terms as required, as referred to in paragraph 2.7 and as set out in this Initial Notice.

¹⁰ With exceptions which are not relevant to Jersey

¹¹ Statement: para 2.61

¹² Ibid: para 2.62

Incorporating defined terms and additional Conditions into each of the Existing Licences

- 3.5 The mechanism for incorporating the defined terms and additional Conditions (together, the **New Provisions**) in the Existing Licences is by way of the Authority modifying each of those licences pursuant to Article 18 of the Telecoms Law.

4. Non-statutory discussions

- 4.1 As noted at paragraph 2.7, officers of the Authority have met with representatives of each of the three Jersey mobile operators. Each discussion was expressly stated to be without prejudice to the right of each operator, and any other person, to make representations in respect of this Initial Notice, in accordance with Article 11(3) of the Telecoms Law.

Points raised

- 4.2 Officers' attention was drawn to the fact that Ofcom had expressly stated in its Statement¹³ that, in deciding to impose the ban on leasing GTs, it had not taken into account the effects on CD operators. Officers were also reminded of the duties of the Authority under Articles 7(2)(c) and (d) to:

*'perform ... its functions under this Law in such manner as [it] considers is best calculated to further the economic interests of Jersey;'*¹⁴

and

*'perform ... its functions under this Law in such manner as [it] considers is best calculated to impose a minimum of restriction on persons engaged in commercial activities connected with telecommunications in Jersey;'*¹⁵

- 4.3 The Authority notes that the duties in Article 7(2) are expressed to apply 'so far as it is consistent' with the Authority's primary duty under Article 7(1):

'The Minister and the Authority shall each have a duty to perform his, her or its functions under this Law in such manner as each considers is best calculated to ensure that (so far as in his, her or its view is reasonably practicable) such telecommunication services are provided, both within Jersey and between Jersey and the rest of the world, as satisfy all current and prospective demands for them, wherever arising.'

- 4.4 It was re-iterated to officers that imposing the New Provisions would adversely affect the revenue of some Licensees and that the introduction of alternative technical solutions would involve additional expenditure and would take time. Opinions varied as to the viability and effectiveness of the technical solutions and their acceptability to existing licensees of GTs.
- 4.5 It was put to the Authority that, instead of prohibiting the leasing of GTs, the Authority should put in place a rigorous regulatory framework, akin to that relating to the carrying out of regulated financial activities, including detailed 'know your client' and anti-money laundering requirements, technical restrictions on lessees to ensure usage of GTs was within a stated business case and contractual provisions enabling the monitoring of such use and the suspension or termination of leases in the case of abuse of the GTs. This, together with further measures suggested to the Authority, will be referred to as the **Regulatory Alternative**.

Specific impacts on the use of +44 GTs by Jersey operators, lessees and subscribers

- 4.6 When the Authority made its statement of its intentions, on 14 September 2024, it was aware of, and took into account, the fact that certain Licensees were likely to be deriving revenue from

¹³ Statement: para 2.64

¹⁴ Article 7.2(c)

¹⁵ Article 7.2(d)

the legitimate leasing of GTs in Jersey. Following such statement, it entered into discussions with each of the mobile providers in relation to the likely impact of the prohibition. It was clear to the Authority that the prohibition on leasing GTs would inevitably have a financial impact on mobile providers, as referred to in paragraph 4.4.

- 4.7 When the Authority determined that it would impose the New Provisions, it took into account the duties referred to in paragraph 4.3 in coming to the conclusion that it was reasonable and proportionate, and in the best interests of Jersey, to prohibit the leasing of GTs.
- 4.8 Nevertheless, officers put to the Authority the issues set out in paragraphs 4.2 and 4.4 and also the Regulatory Alternative. The Authority determined that the Regulatory Alternative was not viable, for a number of reasons, including:
- (a) the current licensing structure would not support the implementation of such a complex additional set of requirements;
 - (b) the information gathering and enforcement powers under Articles 23, 19 and 19A of the Telecoms Law were not suited to monitoring and enforcing compliance with such a regime; and
 - (c) the resource implications of monitoring and enforcing compliance; and
 - (d) Ofcom had considered, and rejected, similar proposals in its Statement (by analogy with its 'Guidance for number range holders to prevent misuse of Global Titles' and the GSMA 'Global Title Leasing Code of Conduct', albeit in the context of non-binding documents as opposed to licence conditions).
- 4.9 In relation to paragraph 4.8(d), the Authority noted that:
- (a) Ofcom makes it clear that its Guidance should be seen in the context of the ban on leasing GTs and that, absent such a ban in addition to the Guidance, there would be 'an inherent risk of loopholes that bad actors could exploit'; and
 - (b) Ofcom notes that the GSMA Code of Conduct 'strongly recommends that [GSMA] members do not lease GTs'.¹⁶
- 4.10 In the light of paragraphs 4.6 and 4.7; the Authority's determination in relation to the Regulatory Alternative as set out in paragraph 4.8; and its further consideration of the facts set out in paragraph 4.4, the Authority re-affirmed its conclusion that it was reasonable and proportionate, and in the best interests of Jersey, to prohibit the leasing of GTs and that therefore it should proceed to vary the Existing Licences by incorporating the New Provisions.
- 4.11 It is intended that the New Provisions will be incorporated into each of the Existing Licences on or about 15 August 2025 and that:
- (a) the prohibition on creating new leases of GTs will come into immediate effect; and
 - (b) the prohibition on the use of existing leases of GTs will be deferred to 1 January 2027.

5. Next Steps

- 5.1 This is Initial Notice of an intended exercise by the Authority of a specified regulatory function, that is to modify each of the Existing Licences by incorporating the New Provisions into such licences. If representations are received before 17:00 on 14 August 2025 regarding the proposed exercise of such function, the Authority will consider them and will decide:
- (a) not to exercise such function;

¹⁶ Statement, para 3.67

- (b) to issue a new Initial Notice; or
 - (c) to issue a Final Notice confirming the modification of the Current Licences.
- 5.2 If no responses are received before such time, the Final Notice effecting such modification will be made on or about 18 August 2025. At such time as the modification takes effect, it becomes binding on all parties.
- 5.3 Written representation or objections to the exercise of this specified regulatory function may be made by e-mail to info@jcra.je on or before 17:00 on 14 August 2025.

By Order of the Authority

10 July 2025

Annex: New Provisions

The modifications to be made to each Existing Licence are set out below, identifying by Existing Licence where modifications are specific to that licence or group of Existing Licences.

Additional defined terms to be added to Condition 1.1 of each Existing Licence, in appropriate alphabetical order

Definition	Text
Appointed Date	means the date of signature of this amended Licence;
C7	means the standard for common channel signalling in Networks (also known as 'SS7');
Global Title	means a number created from any Number as may be used and identified for use as a signalling address in the Licensed Telecommunications System, for the part of C7 known as 'Signalling Connection Control Part';

Additional defined terms to be added to Condition 1.1 of each of the specified Existing Licences, in appropriate alphabetical order

Existing Licence(s)	Definition	Text
Gamma Licence	Numbers	means the formats of codes and subscriber numbers for routing telecommunications services to a Network termination point, User, telecommunications equipment or Customer Premises Equipment in the Bailiwick of Jersey, which formats are allocated by the JCRA or by OFCOM;
Gamma Licence JEC Licence Nitel Licence	Numbering Conventions	means the guidelines from time to time set out in the Bailiwick of Jersey Numbering Plan and/or OFCOM's National Telephone Numbering Plan;
Arqiva Licence BT Licence Gamma Licence JEC Licence Loober Licence Nitel Licence	OFCOM or Ofcom	means the UK's Office of Communications established under the Office of Communications Act 2002, or its successor;

Additional Condition to be added to the Nitel Licence as new Condition 14 and to the Gamma Licence and the JEC Licence, in each case as new Condition 16, and in each case subject to the further modifications set out in the tables below

[14/16] NUMBERING

- [14/16].1 The Licensee shall use only those Numbers that are allocated to it for the purpose of terminating messages on the Licensed Telecommunication System and shall comply with any Directions concerning use and allocation of Numbers that are issued by the JCRA.
- [14/16].2 The Licensee shall manage any Numbers allocated to it with a view to conserving Numbers as a public resource and shall maintain a record of the status of all Numbers allocated to it and on request, shall provide that information to the JCRA in the form directed by the JCRA.
- [14/16].3 The Licensee shall not charge its customers for allocations of Numbers except where authorised and in accordance with any Direction from the JCRA.
- [14/16].4 The Licensee shall comply with any Directions issued by the JCRA in respect of Number Portability, Number Translation, Number hosting and compliance with the Numbering Conventions.

Additional or amended Conditions, set out by reference to the specified Existing Licence where X and Y are to be replaced in each case by the specified number

Condition	Amended/new text
X.1	<i>add at the end:</i> ‘and with the Numbering Conventions’
X.Y	The Licensee shall create and use a Global Title only from a Number allocated to it by Ofcom.
X.Y+1	The Licensee shall not authorise the use of a Number, allocated to it by Ofcom, by others for use as a Global Title, except if the person being authorised is:
(a)	a subsidiary of the Licensee or is the Licensee’s holding company, as such terms are defined in Article 2 of the Companies (Jersey) Law 1991; or
(b)	a person supplying services to Licensee where the Licensee has authorised such use, provided that the Number used as a Global Title is used exclusively to provide that service and for no other purpose.
X.+2	Conditions [X.Y] and [X.Y+1] come into force on the Appointed Date unless as at the Appointed Date, the Licensee, in respect of a Number or Numbers allocated to it by Ofcom, had already authorised another person to use one of more of such Numbers as a Global Title, in which case Condition [X.Y+1] shall come into force in relation to that authorised person on 1 January 2027.

where the values of X and Y are:

Existing Licence	X	Y
Arqiva Licence; BT Licence; Loober Licence; Nitel Licence	14	5
Gamma Licence; JEC Licence	16	5
Genesis Licence; Newtel Licence	19	5
Co-op Licence; Homenet Licence; Starlink Licence	19	9
Airtel Licence; JT Licence; Sure Licence	21	10