

JT's response to JCRA's  
Draft Spectrum Strategy  
(T-105)

23 February 2026

Non-Confidential

## 1. Introduction

JT (Jersey) Limited (“JT”) welcomes the opportunity to respond to the Draft Spectrum T-105 (“the Consultation”). JT support the JCRA’s forward looking approach to reviewing spectrum policy to ensure that the principals guiding allocation and licencing remain up-to-date and aligned to the dynamic nature of the telecommunications markets. This approach is important as it provides regulatory predictability and legal certainty to market players.

## 2. JT’s response to the Consultation Questions

### 2.1. 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.

#### Provisional Decision 1

The JCRA proposes to release the 2G/3G/4G spectrum made available following Sure’s acquisition of Airtel and allocate it to existing Full Service Network operators (JT and Sure). Allocation will be based on an application and assessment process focused on maximising benefits for Islanders. Applicants will need to present a business case demonstrating:

- Sustainable MVNO access for new or existing licensed telecom providers.
- Measurable improvements to service quality and coverage across the Island.
- How additional spectrum would reduce the need for new physical infrastructure, such as masts.
- A commitment to return any unused spectrum for reallocation.

Applicants will further agree to cooperate in a structured and timely re-farming process aimed at efficiently reallocating currently licensed spectrum in the 2G/3G/4G bands between 800 MHz and 2600 MHz and agree to pay any reasonable fixed administrative costs associated with the application and re-farming processes.

#### JT response to Provisional Decision 1

JT welcomes the JCRA’s approach to adopting a market balanced view of two Full Service Network operators to serve the Island, and the proposal that the legacy Airtel spectrum and other potential spectrum blocks should be made available to the two Full Service Network operators.

JT would seek to understand how this spectrum will be offered to the Full Service Network operators, noting that whilst future demand for this spectrum can be foreseen to continue supporting growth, the short-term demand may not warrant an immediate investment and use of the spectrum. JT would propose that the spectrum should be provisionally divided between the Full Service Network operators, such that these can be allocated in the future when the operator presents the outlined business case.

JT would also seek to understand how the JCRA will be liaising with the GCRA on the re-allocation of the spectrum, noting that the GCRA (who have already re-allocated part of the 2100 band<sup>1</sup>) appear to be adopting a different stance on both the number of proposed Full Service Network operators and the re-allocation of the Airtel spectrum.

It is noted that Provisional Decision 1 does not articulate that the JCRA are also proposing to review “the current conditions relating to 4G contained in certain licences” as indicated in section 5.6, or whether this includes making the 2/3/4G bands technology neutral.

#### **Provisional Decision 2**

The JCRA intends prioritising any historically unlicensed spectrum blocks between 800 MHz and 2600 MHz for use by existing Full Service Network providers, subject to an assessment of demand for its use by local utility companies (or similar organisations).

#### **JT response to Provisional Decision 2**

JT welcomes the JCRA’s approach in prioritising historically unlicensed spectrum blocks between 800 MHz and 2600 MHz for use by existing Full Service Network providers. JT notes that the short-term demand may not warrant an operator’s immediate investment and use of the spectrum. Therefore, JT would propose that the unallocated spectrum should be provisionally divided between the Full Service Network operators, such that these can be allocated in the future when the operator presents the outlined business case.

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<sup>1</sup> [Final Decision - Sure 2100 MHz Spectrum Award.pdf](#)

### Provisional Decision 3

The JCRA will not seek to proactively allocate any currently unlicensed spectrum in the 700 MHz or 3.4-3.8 GHz bands designated for use with 5G services in the short to medium term, unless compelling demand arises before then.

#### JT response – Provisional Decision 3

With regards sections 3.27 and 3.28, notwithstanding JT's comments on the 3.4-3.8 GHz band, the JCRA has misrepresented JT with regards feedback on the 700MHz band, failing to note our comment: *"In addition, it would improve network quality and capacity if the 700MHz band was split equally between JT and Sure"*, which echoes the feedback from Sure. Notably, the current 10Mhz allocation in the 700Mhz band is artificially limited [§< redacted ].

JT considers that there is a clear demand for access to the full 15 MHz within the 700 MHz band to support its 5G Standalone (SA) launch. 5G SA requires dedicated spectrum, and in many areas of the Island the 700 MHz band will provide the dominant layer of coverage due to its superior propagation and indoor-penetration characteristics compared to higher-frequency bands.

Restricting JT's access to this spectrum may compromise the quality and consistency of the 5G SA service as customer adoption increases. To ensure sufficient performance, coverage, capacity, and service resilience, JT recommends that the 700 MHz band be divided equally between JT and Sure. [§< redacted ].

JT broadly agrees with the JCRA position outlined in 3.31, that the demands outlined by Clear and JE for Limited/Local Service Network<sup>2</sup> operators, could be fulfilled by the 3.8-4.2 GHz band and echoes JT's view that the 90Mhz of spectrum originally allocated for Limited Service *"would now sit more appropriately in the 3.8 - 4.2 band"*. However, JT also note that the position adopted by the JCRA in 3.31 does not align to the decision outlined under Provisional Decision 4.

JT understands the position outlined by the JCRA that the 3.4-3.8 GHz band has been recently allocated, and that 5G is an emerging technology, and concedes that allocating further spectrum in this band in

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<sup>2</sup> JT note that despite a 'Local Service Network' category outlined in section 2.22, there are no further references to this category in the strategy or any clear indication of how such a category would be supported by the provisional decisions.

the short term to the Full Service Network operators may be excessive. However, JT find that the JCRA's position outlined in 3.33 to be contradictory to the approach adopted for the 2/3/4G spectrum.

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

**Provisional Decision 4**

The JCRA will follow Ofcom's designation of the 3.8-4.2 GHz band and the 26 GHz and 40 GHz bands (mmWave band) as being used for 5G. No further work will be undertaken for these bands until clear evidence of demand is identified.

**JT response – Provisional Decision 4**

Under section 4.3, the JCRA asserts "*JT expressed the view that implementation should be deferred to a later time*". Whilst JT's response to Question 6 stated "*JT will be interested in using this band in the future as an addition to the 3.4-3.8GHz band in order to provide additional network capacity and potentially for private network access*", we did not propose that discussion on this 'should be deferred'. Rather, JT anticipated that a framework should be developed (such as the Shared Access Spectrum adopted for this band in the UK) to support private networks, having already stated in answer to Question 5 that "*we anticipate demand for spectrum for private network usage*", and aligned to our response to Question 8.

JT anticipate that demand for Private Networks will increase with maturity and advanced use cases of 5G, and that the 3.8-4.2 band is well positioned to support these use cases, especially where this would be in a Local Service Network where high in-building/campus demand may not be well suited to use of public spectrum. Such use cases are likely to be driven through large enterprise, utility and government (as outlined in the JCRA definitions of Local Service Network under section 2.22) and will be ad-hoc and time sensitive lest poorer technical alternatives such as WIFI, proprietary wireless or wired solutions be deployed to meet deployment timescales. As such, in the absence of an agreed framework, especially where the spectrum may be re-used in local network contexts, JT does not believe that the approach to "*return to this when clear evidence of demand emerges*" would meet the required timeliness when these demands emerge. When combined with Provisional Decision 2, this effectively rules out any non-MNO entity from providing Limited/Local Service Networks, and when further combined with Provisional Decision 3 would place significant demand on the existing 5G spectrum allocations (compounded further by the ongoing defragmentation).

JT believes that the JCRA's approach to require "*evidence of demand*" before undertaking further work in this band is contrary to the approach adopted by Ofcom for the deployment of services in the UK, and will stifle Jersey adoption and innovation in 5G and therefore do not support this approach.