

JT's response to
T-062 Telecoms Security
Consultation
on
Draft Procedural Guidance
(Statement of Policy)
and
Resilience Guidance
(JCRA 25/19, 25/20 & 25/21)

20 October 2025
Non-Confidential

1. Introduction

JT (Jersey) Limited (“JT”) welcomes the opportunity to respond to the JCRA’s telecom consultation on Draft Procedural Guidance (Statement of Policy) and Resilience Guidance (the “**Consultation**”). This is a non-confidential response.

2. JT’s response to the Consultation Questions

Question 1. Do you have any comments on the Authority’s role in the telecoms security framework and its approach to issuing Procedural Guidance and Resilience Guidance under the Law?

JT supports the Authority’s proactive role in strengthening Jersey’s telecoms security framework and recognises the importance of issuing clear Procedural and Resilience Guidance under the Law and agree that alignment with UK legislation and Ofcom’s regulatory approach is logical.

However, JT respectfully requests that the Authority consider that while JT is referenced in the draft Telecoms (Security Measures) Order as a network and service provider, our operational scale, turnover, and access to local resources differ significantly from UK Tier 1 operators. We ask that the Authority take these realities into account when exercising its powers and duties under the Law, particularly in relation to compliance expectations and enforcement.

Question 2. Do you have any comments on the Authority’s approach to developing its Draft Procedural Guidance and Draft Resilience Guidance?

JT acknowledges and supports the structured and transparent approach to developing the Procedural Guidance and Resilience Guidance. JT appreciates the opportunity to feedback and engage with the development process

Question 3. Do you agree with the Authority's planned approach to compliance monitoring contained in Section 3 of the Draft Procedural Guidance? If not, please explain why and propose any alternatives.

JT broadly supports the Authority's planned approach to compliance monitoring as outlined in Section 3 of the Draft Procedural Guidance. We agree that a proactive and structured monitoring regime is essential to ensure providers meet their security obligations under the Law. The Authority's intention to use its powers to gather information on how providers are meeting or planning to meet the legal requirements in the Security Measures Order is appropriate and necessary however, JT would like to raise the following considerations.

Approach to Monitoring Compliance

JT notes that the Authority is proposing to adopt a compliance monitoring model aligned with Ofcom's approach, including the issuance of regular information request notices. We appreciate that this is intended to support the Minister's expected timelines for implementing the various measures outlined in the Telecoms Security Order.

While JT understands the rationale behind this approach, we have concerns regarding the volume and frequency of information requests as described in Section 3.22 of the Draft Procedural Guidance. Specifically, we believe that the proposed frequency may be disproportionate given the current resources available to both operators and the Authority. Whilst, the Authority recognises these challenges within the Draft Procedural Guidance, we respectfully suggest that a more proportionate approach would be to limit formal information requests to once per year. This would:

- Allow operators sufficient time to prepare comprehensive reports;
- Provide the Authority adequate time to review submissions; and
- Enable meaningful follow-up engagement without overlapping reporting cycles.

Our concern is that if follow-up meetings or clarifications are required, they may extend into the next reporting period. This would place additional strain on the same teams responsible for preparing both the follow-up and the new submission, impacting the efficiency and quality of response. This challenge applies equally to operators and the Authority, and we believe a single annual request would be more proportionate.

Question 4. Do you agree with the Authority's planned approach to reporting security compromises contained in Section 4 of the Draft Procedural Guidance? If not, please explain why and propose any alternatives.

JT supports the Authority's intention to establish a clear and structured approach to reporting security compromises under the new telecoms security framework. We recognise the importance of timely and accurate incident reporting to enable effective oversight, coordination, and mitigation of risks to Jersey's communications infrastructure. However, this can only be applied as far as a clear and objective compromise has occurred and is a risk to the functionality or security of the essential functions.

Furthermore, considering JT's existing reporting requirements to other regulators / independent bodies (e.g. JOIC, JCSC and the JCRA), there is a risk of overburdening Jersey providers with multiple reporting requirements. We would welcome a unified reporting process, preferably with one single point of reporting, not multiple. Should there be multiple reporting requirements, it can be assumed that an operator making such a report, will not only be burdened with the task of the reporting itself, but with the duplication of effort in responding to multiple further information requests and scrutiny.

We note that a secure communication method will be specified by the Authority. We anticipate this being a secure portal to upload documents ensuring both timely provision and secure access. In order to ensure consistency in reporting, JT recommends that the Authority develop a notification form with mandatory fields to complete the relevant information. The completed form should then be downloadable to ensure that the provider has a record of the submitted security compromise report.

The Authority acknowledges the fact that not all of the information will be known when a security compromise report is made. JT's experience is that security compromises can develop overtime, and information will become known as the incident evolves, JT therefore recommends that the Authority develop a method to update the report.

The Authority should also recognise that operators have finite resources and, during a security compromise, subject matter experts will be working on restoring service. During the incident, the operator will be balancing the need to restore service against reporting to the Authority. Therefore this difficult balance should be acknowledged by the Authority when it considers requests for additional information or updates.

Reporting Table observations

Table 1 – Fixed network numerical thresholds

Footnote 2 refers to 1000 end users or 25% of the providers total number of end users on the affected service however the table has a minimum of 100 or 25% of the users affected. Please clarify the user number criteria.

Table 2 – Mobile network numerical thresholds

We believe footnote 2 attached to “Mobile network providing access to the emergency services” is not correctly applied and should be attached to “MVNO voice or data service/network offered to retail customers”. The footnote 2 attached to 25% should be footnote 3.

Question 5. Do you agree with the Authority’s planned approach to enforcement contained in Section 5 of the Draft Procedural Guidance? If not, please explain why and propose any alternatives.

JT acknowledges the JCRA's requirement to enforce compliance with the telecoms security duties. We support the Authority’s structured, evidence-based, and proportionate approach to enforcement as outlined in the Draft Procedural Guidance.

Question 6. Do you agree with the Authority’s planned approach to information sharing contained in Section 6 of the Draft Procedural Guidance? If not, please explain why and propose any alternatives.

JT supports the Authority’s commitment to security in its approach to information sharing under the telecoms security framework.

JT will comply with secure data exchange as and when required. Specific methodologies to be determined on an as-needed basis.

Question 7. Do you have any other comments on the Authority’s Draft Procedural Guidance?

JT appreciates the clarity and structure of the draft Procedural Guidance and supports its overall intent. However, we would like to reiterate the importance of proportionality in compliance expectations. JT would take the opportunity to reiterate similar feedback that has been provided to the Government of Jersey’s consultation on the draft Order and draft Code of Practice.

The timescales being proposed for Jersey operators is much stricter in comparison to the UK measures. Jersey operators are being treated in an equivalent manner to a UK Tier 1 operator with a shorter implementation timescale compared to the UK version of the Code of Practice.

An analysis of the timescales within the draft Code of Practice can be found in Table 1 below. Table 1 compares the timescale to adopt the UK Code of Practice (published December 2022) compared to the proposed timescales for the Jersey version (proposed publication December 2025).

Table 1

	UK – Tier 1 (months)	UK – Tier 2 (months)	Jersey (months)
1st Group of Measures	15	27	15
2nd Group of Measures	27	27	15
3rd Group of Measures	27	27	15
4th Group of Measures	51	51	39
5th Group of Measures	63	63	51

As is evidenced in Table 1, the proposed measures and timelines are disproportionately applied to Jersey operators, who do not compare in size, scale and revenues to the UK Tier 1 providers. This disproportionate application fails to consider the limited resources available to local operators, nor does it consider the pace of change or the potential disruption to business operations. As such, it does not appear to be a proportionate risk-based approach. This will also impact the JCRA, which will be required to meet regulatory timelines within condensed timeframes, facing similar resource constraints as the telecom operators.

JT has proposed that the timescales are revisited and suggested that it would be more appropriate and proportionate to provide Jersey operators with timescales equivalent to those applied to Tier 2 UK operators. This would ensure a 5 phased approach and at minimum, provide Jersey operators with 27 months to achieve the first 3 groups of measures and extend the 4th to 51 months and 5th to 63 months.

Question 8. Do you support the Authority's planned position on key concepts, drivers and relevant risks contained in Section 3 of the Draft Resilience Guidance? If not, please explain why and propose any alternatives.

As mentioned earlier in this response, local operators are of a significantly smaller scale than their UK counterparts, this brings challenges in terms of resourcing both in terms of people and equipment. UK operators benefit from large scale nationwide operations which allows them to distribute resources where needed. In an incident scenario this enables them to allocate resources that would normally be deployed elsewhere to the incident, giving them more flexibility and potentially enabling faster restoration. The same is true of spares holdings. Local operators have limited resources and must deploy a risk based approach considering the specificities of the services provided. The Authority must take this into account.

It is anticipated that the overall costs to JT to ensure compliance to the overall draft Order and draft Code of Practice will be in excess of [< redacted] over the next 5 years. In addition to specific costs associated with compliance to the draft Code of Practice, JT are in the process of removing High Risk Vendors (HRV) from its network which is estimated at [< redacted]. Although this investment includes a significant refresh of JT's network and the introduction of 5G mobile services, without the requirement to remove HRV, the costs would have been significantly lower. These costs will have a substantial impact on a business the size and scale of JT who are already operating within an industry of increasing regulatory demands and decreasing market size and revenues.

Whilst JT supports the Authority's identification of key concepts and risk drivers in the Resilience Guidance draft we would highlight that the increased requirements around security and resilience will increase the costs of operation. This will flow through to the prices charged to consumers and businesses in Jersey through increased service costs. These increased costs could potentially have a lasting impact on the wider Jersey economy and the Crown Dependencies supply chain, causing a ripple effect economically.

Question 9. Do you support the Authority's planned technical guidance on reliability and resilience contained in Sections 4, 5 and 6 of the Draft Resilience Guidance? If not, please explain why and propose any alternatives.

JT supports the Authority's technical guidance on reliability and resilience and agrees with the principles outlined in the resilience guidance document and appreciates its alignment with UK standards.

The guidance assumes a level of technical and operational capacity that may not be available to all Jersey-based providers. JT operates in a jurisdiction with limited access to specialist personnel, infrastructure, and vendor support. These constraints make it more difficult to implement resilience measures at the scale and speed expected in larger jurisdictions.

Meeting the resilience-related security duties outlined in the guidance often requires significant investment in:

- Redundant systems;
- Diverse routing;
- Failover capabilities; and
- Enhanced monitoring and testing.

These upgrades are capital-intensive and as described in the answer to question 8, will have economic impacts through the local supply chain.

Question 10. Do you have any other comments on the Authority's Draft Resilience Guidance?

JT has the following specific comments on the following sections of the Draft Resilience Guidance:-

Reference	Comment
Section 4.19	This (and subsequent sections) merge the term 'domains' with the term 'sites'. JT consider this merging of the terms to be confusing when considering the 'network domains' rather than specifically the types of sites / physical premises.
Section 4.28	As per our comment in 4.19 above, the mixing of the terms “network domains” with “sites” is confusing. JT suggest that it would be better to re-word as follows:- “Aggregation/backhaul networks are different to the core and “last mile” networks for a variety of reasons. The number of sites and geographical spread of the aggregation/backhaul networks are typically far greater than the core network though notably in smaller jurisdictions such as Jersey the requirement to implement a significant number of these sites distinct to core network sites is reduced. In the aggregation/backhaul networks the level of physical connectivity resilience may be less than the core networks. Nonetheless aggregation/backhaul networks are expected to be built with an appropriate degree of physical resilience regarding equipment, physically separate/diverse connectivity and power backup.”
Section 4.35	Quality of Service relates to service reliability (e.g. SLA performance) rather than Quality of Experience which is much wider and is a measure of the delight or annoyance of a customer's experience with a service. Whilst JT would agree that forecasting capacity demands can impact reliability or user experience, there are other factors that can impact reliability.
Section 5.7	JT notes that this refers to the UK EC-RRG guidelines which are not in place in Jersey. Can the JCRA clarify to what extent a Jersey operator is being measured against the UK EC RRG guidelines.
Section 5.10	This statement is very broad. The impacts of climate change could be wide ranging and varying. While Jersey operators would be expected to consider known impacts, such as flooding risks in low lying areas, and put mitigation measures in place based on the risks. It would be unreasonable to expect operators to take measures that had never occurred before and had a low likelihood of occurring.

