



29th April 2025

Our ref: T1686G

Jersey Competition & Regulatory Authority
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Dear JCRA Team

Response to the JCRA's Telecoms Market Review (Case T-083) – Support for Fixed Number Portability (FNP)

The GCRA welcomes the opportunity to comment on the Jersey Competition Regulatory Authority's Draft Decision in Case T-083, and I am writing to express our support for investigating the introduction of Fixed Number Portability (FNP) across the Channel Islands.

We agree with the JCRA's initial assessment in Box 4 of the Draft Decision that, although FNP has been implemented in many comparable jurisdictions, there remains a need for further analysis of user demand, implementation costs, and practicability. However, the GCRA takes the view that if FNP were introduced it should be evaluated on a coordinated, pan-Channel Island basis and implemented accordingly for the following key reasons:

1. Economies of scale and scope

While FNP may be technically feasible in either island alone, implementing it in only one jurisdiction would not seem to be the optimal solution given the current context. The system that currently supports MNP is pan Island and it is likely that the same rationale for doing so applies to FNP. An alternative approach would risk creating a two-solution approach imposing costs on small scale telecom operators who compete in both jurisdictions which ultimately consumers will bear. A single-island solution risks diverting investment and introducing inefficiencies across both Guernsey and Jersey that are avoidable. Avoiding unnecessary duplication of systems or misalignment of wholesale processes would appear to provide the most efficient means of providing the necessary functionality.

2. Better quality systems

The telecoms markets in Guernsey and Jersey share many similar features, in particular the same core operators are active in both jurisdictions. Regulatory interventions that utilise and work with those shared/common systems and processes are likely to offer greater rigour and resilience in supporting customers. This suggests the most effective means of introducing FNP is through a pan Island approach.

3. Enabler of Competition and Innovation in Business Voice

FNP is likely to be especially important in enabling innovation in the business fixed voice market. The ability to retain existing numbers is a key factor in a business's decision to change provider, and the absence of FNP acts as a barrier to switching. Introducing FNP may therefore unlock greater customer mobility, lowering switching costs, which in turn will promote innovation, particularly in the development and adoption of cloud-based voice services and unified communications platforms. It supports new entrants offering modern, IP-based solutions such as cloud calling integrated with productivity platforms (e.g., Microsoft Teams), and provide greater choice for businesses seeking flexible, scalable voice services.

4. Industry Support in Guernsey

In Guernsey, two licensed telecommunications operators have expressed clear and consistent support for the implementation of FNP, and a pan Island solution. Those operators appear to recognise FNP as an essential step toward improving competitive conditions and addressing customer demand particularly in the business segment. This support provides an important mandate, and the GCRA is therefore actively pursuing FNP as an access solution to assist the market and improve switching options.

5. FNP and Wholesale Access Go Hand in Hand

FNP will also complement other ongoing access and wholesale initiatives being progressed as part of the GCRA's market development programme. Even with FNP in place, access to the incumbent's network infrastructure remains a precondition for meaningful competition in fixed voice markets. In the absence of such access, new entrants cannot viably serve customers without building their own infrastructure. Where existing infrastructure in these smaller economies is sub-scale, this represents duplication. The introduction of FNP should we suggest be complemented by robust wholesale access obligations, including a wholesale fixed voice offering.

6. Regulatory Alignment and Efficiency

A coordinated rollout of FNP will ensure alignment between Jersey and Guernsey's respective regulatory frameworks and technical systems which would also reduce administrative burden for operators and enhance the long-term efficiency of regulatory oversight, particularly where cross-jurisdictional services are considered.

7. Consumer Choice and Market Trust

Benefit to consumers is central to the case for introducing FNP. From a consumer perspective, the ability to retain a fixed number when switching providers enhances trust, reduces switching costs, and directly empowers users, particularly business users who depend on continuity in contact information arguably to a greater extent than households. Even in a declining fixed voice market, voice calls remain a key means of communication and FNP has the potential to signal regulatory support for competition, innovation, and fairness on consumers' behalf as it has for MNP.

Conclusion

With a clear signal of support from licensed operators in Guernsey and cross-island benefits, we are committed to developing a coordinated and practical implementation strategy for FNP that ensures cost-effective delivery and consumer benefit. The GCRA therefore supports the JCRA's proposal to further develop policy around Fixed Number Portability and proposes that this is a candidate for a pan island collaboration with the JCRA, if it decides to do so.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Byrne', with a long horizontal flourish extending to the right.

Michael Byrne
Chief Executive
Guernsey Competition & Regulatory Authority