

From: [REDACTED]
Sent: 13 October 2025 16:10
To: [REDACTED]
Cc: JCRA
Subject: RE: Draft procedural and resilience guidance – consultation closing reminder

Ian,

Sorry my response will be short.

We appreciate the opportunity to comment on the Draft Guidance on Telecoms Security.

While we support the objective of strengthening telecoms security across the sector which Newtel/Homenet take very seriously, we do not believe that the Jersey Competition Regulatory Authority (JCRA) is currently fit to ensure or enforce the proposed Code of Practice.

This view is based on recent patterns of regulatory behaviour that indicate a lack of impartiality, insufficient technical expertise, and a tendency to favour incumbent operators. These actions have undermined Newtel/Homenet confidence in the JCRA's ability to act as an independent and balanced regulator.

Given these concerns, we believe that any oversight or enforcement of a Telecoms Security Code of Practice should be handled either by an independent technical authority or under a framework that ensures transparent governance and accountability, rather than left solely to the JCRA in its current form.

This response can be made public

Kind Regards,

Sabri Mokrani
CTO/COO



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