



2018 Review of Mobile Termination Rates in Guernsey

Call for Information

Channel Islands Competition and Regulatory Authorities

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1. Introduction

- 1.1 Telecommunications networks, both fixed and mobile, need to be connected to one another in order that customers of those different networks are able to call each other. Telecommunications regulators around the world have a role in ensuring the adequate connection of those networks.
- 1.2 To support the connection of those networks one of the services that network operators offering voice services provide to each other is call termination. Call termination means the completion of a call from a customer of another network. Mobile call termination ('**MCT**') is a particular type of call termination service provided by a mobile network operator ('**MNO**'). It enables the originating network operator to connect a call through to a customer of a different MNO.
- 1.3 The originating operator pays an amount known as the mobile termination rate ('**MTR**') to the MNO providing the wholesale service.
- 1.4 Regulators in many European countries have identified a need to ensure that MTRs are set at a level that reflects the efficient and cost-effective provision of those services. The European Commission has also set out its view that there is a significant benefit in national regulatory authorities moving towards setting MTRs based on the long run incremental cost ('**LRIC**') of provision.
- 1.5 In Guernsey, the Office of Utility Regulation ('**OUR**') carried out two separate reviews of MTRs between 2006 and 2011. The first review determined that an average MTR of 6.75 ppm should be put in place from 1 April 2007 and a further review in 2009 resulted in all Guernsey MNOs being found to hold significant market power ('**SMP**') and applying MTRs at a flat rate of 4.11 pence per minute ('**ppm**') (including transit charges). 4.11 ppm is both significantly higher than many other countries and given studies elsewhere, may be in excess of the LRIC to MNOs of providing those services.

2. Purpose of this Call for Information

- 2.1 This Call for Information consults on the need for reassessment of the current MTR. If so on what basis?
- 2.2 CICRA is therefore issuing this Call for Information to seek the views of stakeholders on the following issues in particular:
- (a) Do the MNOs active in Guernsey continue to hold SMP on the relevant market as stated in the September 2017 Final Notice?
 - (b) If the MNOs do have SMP, is a price control (ie, setting an MTR rate) the most appropriate remedy?
 - (c) If setting an MTR rate is the most appropriate remedy, what is the basis on which the MTR should be calculated?
- 2.3 CICRA sets out below its provisional views, subject to consideration of stakeholders' responses to this Call. CICRA plans to publish a draft decision, which will set out its position having considered stakeholders' responses, which will then be the subject of a further consultation.
- 2.4 ***Disclaimer*** - *This document does not constitute legal, technical or commercial advice; CICRA is not bound by this document and may amend it from time to time. This document is without prejudice to the legal position or the rights and duties of CICRA to exercise regulatory powers generally.*

3. Structure of the Call for Information

3.1 This document is structured as follows:

Section 4:	Do the MNOs active in Guernsey have SMP in the relevant market?
Section 5:	Possible regulatory intervention by the GCRA.
Section 6:	Options for setting the MTR in Guernsey
Section 7:	Summary and Next Steps
Annex 1:	Legal and Regulatory Framework
Annex 2	Summary of Consultation Questions

3.2 Interested parties are invited to submit comments to CICRA in writing or by email on the matters set out in this paper to the following addresses:

CICRA
Suite 4, 1st Floor, Plaiderie Chambers
La Plaiderie
St Peter Port
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GY1 1WG

Email: info@cicra.gg

3.3 All comments should be clearly marked “2018 Call for Information on the Review of Mobile Termination Rates (MTRs) in Guernsey” and should arrive by 5 pm on 1 February 2019.

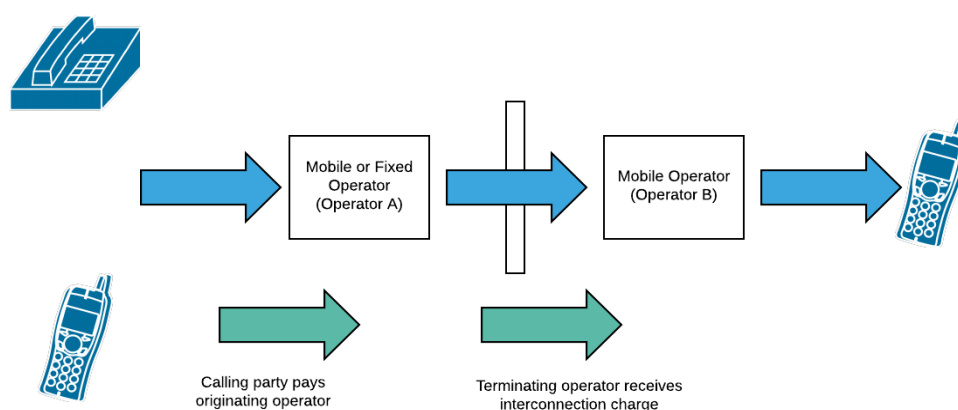
3.4 In line with CICRA’s consultation policy, the Authority intends to make responses to the consultation available on the CICRA website (www.cicra.gg), the combined website of the GCRA and JCRA. Any material that is confidential should be put in a separate annex and clearly marked as such so that it may be kept confidential. CICRA regrets that it is not in a position to respond individually to the responses to this consultation.

4. Do the MNOs active in Guernsey have SMP on the relevant market?

Introduction

- 4.1 An operator originating a call to a mobile number (the originating operator) pays an amount known as the mobile termination rate (MTR) to the mobile network operator (MNO) providing the wholesale service. This is the current interconnection practice in Guernsey (as in many countries in Europe and across the world). The call flow is illustrated in figure 1 below:

Figure 1: Mobile termination and calling network provider pays.



- 4.2 In 2017, the GCRA found that there were distinct markets for the termination of calls on each mobile network in Guernsey and that each MNO held significant market power (SMP) for the termination of traffic on its own network (the “**SMP Decision**”). This conclusion would be likely to form the basis of any subsequent decisions by the GCRA to impose a price control on MTRs in Guernsey.

CICRA is not aware of any change in the relevant markets that would affect its previous findings of SMP; but invites stakeholders’ views as to whether those findings remain appropriate.

Question 1: Does the respondent agree that the SMP decision contained in the *Final Decision – Mobile Call Termination 2017 - Market Definition and Dominance*¹ is still valid? If the respondent has alternative views or evidence the respondent is asked to explain those and provide all of its analysis and assessment relating to this matter to inform CICRA’s considerations and next steps.

¹ <https://www.cicra.gg/cases/2016/t1236gj-mobile-termination-rates/t1236gj-final-decision-mobile-call-termination-2017-market-definition-and-dominance/>

5. Possible regulatory intervention by the GCRA

Introduction

- 5.1 In 2010, the GCRA set a maximum MTR that each MNO could impose in Guernsey.
- 5.2 Given that the GCRA, in its SMP Decision, found that each MNO has SMP on the relevant market for MCT on its own network (in line with best practice in other jurisdictions), the Authority seeks the views of stakeholders on:
- (a) Whether an *ex-ante* remedy is appropriate; and
 - (b) If an *ex-ante* remedy is appropriate, which remedy or combination of remedies is best suited to this market.

Is an *ex-ante* remedy appropriate?

- 5.3 An *ex-ante* remedy might only be considered appropriate if:
- (a) Harm can be expected to result from the SMP held by MNOs; and
 - (b) *Ex-post* competition law remedies would not be able adequately to address that harm.

CAN HARM BE EXPECTED TO ARISE FROM THE SMP HELD BY MNOs?

- 5.4 CICRA's provisional view is that, on the basis that MNOs have SMP on the relevant market, they would be likely to have the incentive and the ability to engage in the following types of harmful behaviour in relation to the termination of mobile calls on their networks:
- (a) **Refusal to supply MCT:** An originating service provider whose interconnection request is rejected by an MNO, or accepted only on unreasonable terms, would not be able to connect its customers to customers of that MNO (on fair and reasonable terms or at all). This would harm the originating service provider's customers. Such behaviour could also reduce competition and thus, by extension, further harm end-customers. The use of transit providers would not address this harm adequately, not least because an MNO could also refuse to provide access on fair and reasonable terms to such a transit provider.
 - (b) **Excessive pricing.** It is likely that, absent regulation, MTRs would be set at excessively high levels. In CICRA's view, this would be harmful² for the following reasons:
 - i. **Distortion of competition in retail markets:** The ability to exploit a position of SMP in the relevant market has implications and risks for retail markets given each of the MNOs is vertically integrated with their own retail customers. Each MNO would have the ability and incentive to subsidise their own retail customers which

² If MNOs set excessive MTRs they may be able to earn economic profits for that service (ie, returns in excess of their cost of capital). These profits from MCT could be 'returned' to consumers through competition at the retail level in the form of incentives to buy mobile services-such as lower retail core prices and/or handset subsidies. This competing away of excess profit is known as the 'waterbed effect'.

We consider that even if the waterbed effect led to a full 'recycling' of higher MTRs (which we do not believe to be the case) excessive MTRs can still harm consumers' interests by distorting competition in downstream retail markets. Unregulated MTR levels also affect economic efficiency and have distributional impacts.

other operators will be forced to meet the costs of through excessive MTRs. Such distortionary effects are harmful to the health of competition and consumer choice where SMP exists.

- ii. **Economic inefficiency:** Efficient markets are essential in supporting increased productivity and economic growth. Excessive MTRs would contribute to economic decisions around usage and choice of services by consumers that do not match their economic costs. In a market where there is SMP this is potentially harmful to economic growth given the limitations of choice by consumers and distorted incentives that result from such price signals³.
 - iii. **Distributional impact of MTRs:** Excessive MTRs may impact different groups of mobile users differently depending on whether they are net makers or net receivers of calls. With unregulated MTRs such retail effects are likely to be even more pronounced.
- (c) **Discrimination between customers:** A discriminatory supply of MCT could take both price and non-price forms. MNOs could exert their SMP to exclusionary effect in the absence of regulation through discriminatory treatment of smaller service providers. For example, they could charge higher MTRs and/or provide an inferior quality of service to new entrant service providers or smaller service providers in order to create barrier to entry or expansion for such players.
- (d) **Decline in market transparency:** A lack of reasonable clarity or certainty with respect to MTRs could be a consequence of unregulated charges by providers with SMP. Service providers who need to purchase MCT services would be unable to anticipate their costs accurately as a result. This may lead to consumer harm if service providers who need to purchase MCT then mitigate that financial risk by increasing retail prices. Originating service providers may also react to such financial risk by excluding from their call allowances/bundles calls made to mobile numbers which incur unclear or uncertain MTRs. This could then result in undesirable consumer outcomes, such as tariff complexity and/or, potentially, bill shock. Lack of clarity over MTRs may also deter potential new entrants, thus potentially harming competition and, by effect, end-customers.

WOULD *EX-POST* COMPETITION LAW BE SUFFICIENT TO ADDRESS THESE HARMS?

5.5 Before considering *ex-ante* regulation (ie, SMP conditions) to remedy the problems arising from SMP in MCT markets, it is important to consider if competition law remedies might be sufficient to address these problems. This is because *ex-ante* regulation should only be imposed where competition law remedies are insufficient to address the competition problem(s) identified. Insufficiency can involve a combination of timeliness concerns and the degree of harm that results. The damage to the market can be more extensive the greater the length of time taken

³ Examples of this include:

- The price of calls to mobiles from fixed lines will be relatively high, and other charges for mobile services (such as monthly access fees) relatively low. This inefficient structure of prices would lead to overconsumption of mobile retail services and under consumption of other retail services that use MCT, such as fixed-to-mobile calls.

Even with respect to mobile-to-mobile calls, excessive MTRs would create distortions. Because MTRs establish a floor for the price of mobile-to-mobile calls between service providers (ie, off-net calls), high MTRs can lead to higher prices for off-net calls than for on-net calls, thereby distorting consumer choice between the two call types.

to address that harm and/or the extent to which already fragile competition is harmed irreparably.

- 5.6 Generally, the case for *ex-ante* regulation in communications markets is based on existence of market failures which, by itself or in combination, mean that competition might not be able to become established if the regulator relied solely on *ex-post* competition law powers. Therefore, in the presence of market failures, it is typically appropriate that *ex-ante* regulations are used to address risks of market failures and any barriers to entry that might otherwise prevent effective competition from becoming established within the relevant market defined. Also, by imposing *ex-ante* regulation that promotes competition it may be possible to reduce such regulation over time, as markets become more competitive, allowing greater reliance on *ex-post* competition law.
- 5.7 In MCT markets the nature of the problem is one of persistent SMP by a number of monopolies. Each MNO operates in a distinct product market where there are considerable barriers to entry. The risks of market failure which would arise in the absence of any regulation is therefore a material consideration and in CICRA's view justifies *ex-ante* intervention.
- 5.8 *Ex-post* competition law seems unlikely by itself to bring about or promote effective competition as it focuses on past abuses of dominance. In contrast, *ex-ante* regulation is normally aimed at actively promoting and/or protecting the development of effective competition going forward by attempting to reduce the level of market power or dominance in the identified relevant markets and failing that, to constrain the ability to abuse such a position.
- 5.9 The GCRA provisionally considers that *ex-post* competition law, under the Competition (Guernsey) Law 2005 would be insufficient to address the lack of effective competition in the markets defined above and prevent the problems identified in this consultation document. Therefore, *ex-ante* regulation is required. This is a position that is consistent with many other jurisdictions.

Question 2: Does the respondent agree with CICRA's provisional views that *ex-post* competition law would be insufficient to address the lack of effective competition in the markets defined and prevent the problems identified in this consultation? If the respondent does not agree with CICRA's provisional view the respondent should provide all of its analysis and assessment.

If an *ex-ante* remedy is appropriate, which remedy or remedies should be imposed?

REMEDIES AVAILABLE FOR *EX-ANTE* INTERVENTION

- 5.10 The table below sets out the issues that may be appropriate to address through intervention and in broad terms the remedies available to the regulator under its legal powers that would be suitable to address each issue.

Table 1: Suitability of ex ante remedies to address particular competition problems

			Relevant remedies (SMP conditions)			
			Network access obligation	Price transparency obligation	No undue discrimination obligation	Charge control
Competition problems (arising from SMP)	Price	Excessively high MTRs				YES
		Lack of price certainty		YES		YES
		Undue Discrimination (price)			YES	YES
	Non-Price	Undue Discrimination (non-price)			YES	
		Refusal to supply mobile call termination services	YES			

5.11 In the following subsections below, consideration is given to the remedies that are appropriate to address the different types of harmful behaviour in which an MNO with SMP could engage in in relation to the termination of mobile calls on its network:

- (a) **Network access obligation.** A network access obligation would address a refusal by an MNO to terminate calls on its network by requiring MNOs to provide MCT on reasonable request on fair and reasonable terms and conditions. CICRA’s provisional view is therefore that a general network access obligation is likely to be needed to protect end-to-end connectivity and should apply to all MNOs with SMP;
- (b) **Price transparency obligation.** In the absence of reasonable clarity and certainty with respect to MTRs the purchaser of MCT (such as originating call providers and transit providers) would not have forward-looking certainty concerning the costs of purchasing this service. This would harm competition and consumers’ interests at the retail level. CICRA is therefore provisionally minded to impose a price transparency obligation on all MNOs with SMP, requiring MNOs with SMP to publish their MTRs and to notify changes in their MTRs is proposed;
- (c) **No undue discrimination obligation.** The two remedies above do not provide sufficient protection against dominant providers exploiting their SMP to distort competition in other ways that would ultimately harm consumers. There is the potential for discrimination, especially that which may affect smaller and new entrant MNOs, to exist in the supply of MCT by MNOs. CICRA is therefore provisionally minded to impose a condition that requires that the MNOs do not unduly discriminate with respect to network access;
- (d) **Charge control obligation.** CICRA’s current view is that the three remedies set out above would not be sufficient to prevent MNOs from being able to charge excessive

MTRs; and that it would therefore also be appropriate to set a maximum MTR for MNOs operating in Guernsey⁴.

Question 3: Does the respondent agree with CICRA's provisional views on *ex-ante* remedies? If the respondent does not agree with CICRA's provisional views the respondent should provide all of its analysis and assessment.

⁴ For completeness we note that although an MNO that begins offering MCT after our decision is published will not be subject to SMP conditions, if an interconnecting operator were unable to agree terms of access with such an MNO then it could refer a dispute to us for resolution. While we would consider each case on its facts in general we are likely to consider that the regulated cap under the proposed charge control is the appropriate starting point for MTRs charged by new entrant MNO.

6. Options for setting the MTR in Guernsey

Introduction

6.1 In considering the approach to setting a charge control obligation (ie, a price cap), there are a number of bases on which the MTR in Guernsey could be set, including:

- (a) Keep the MTR at its current level of 4.11 ppm;
- (b) Adopt a long-run incremental cost ('LRIC') model approach;
- (c) Set an MTR by benchmarking,
- (d) Setting the Guernsey MTR at a rate equivalent to that of the UK rate. This could be achieved by a glide-path over two to three years, or
- (d) Rely on available modelling carried out where key features are applicable to the Guernsey market.

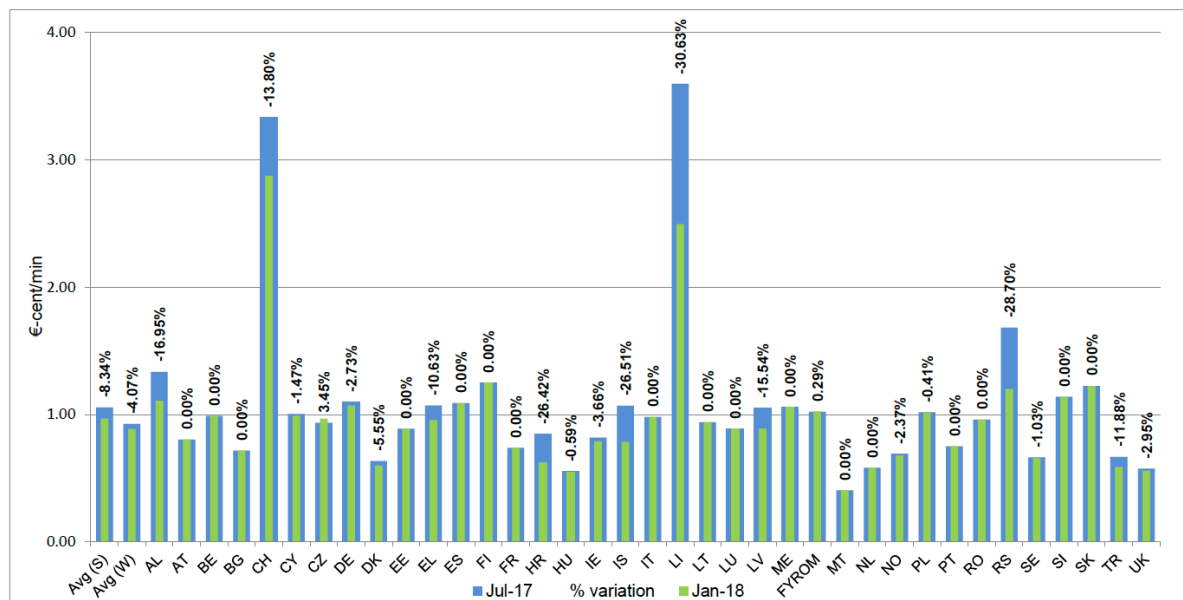
6.2 If a price cap is to be applied, as provisionally proposed above, it will be necessary to consider which of these options is the most appropriate for the particular circumstances of Guernsey and the relevant market context.

Keep the MTR at its current level of 4.11 ppm

6.3 CICRA does not consider that the MTR remaining at its current level is an acceptable option for the forward setting of the MTR. This is because:

- (a) The rate of 4.11 ppm is significantly higher than many other European jurisdictions. It has been in place for a number of years and has not been reduced despite significant falls in the MTRs applicable in other jurisdictions across Europe. Such reductions have been driven by price controls, which in turn partly reflect falls in the underlying costs of the network equipment used by MNOs. CICRA would expect similar cost reductions also to have occurred in Guernsey, but these have not led to any reduction in the level of MTRs.

Figure 3: MTR per EU country – Variation of MTRs per country (from July 2017 to January 2018) in Eurocents per minute and % (Source: BEREC, Termination Rates at European Level, January 2018, BoR (18)103)



Source: NRAs, BEREC

Figure 2: Average MTR: Time series of simple average and weighted average (Source: BEREC, Termination Rates at European Level, January 2018, BoR (18) 103)

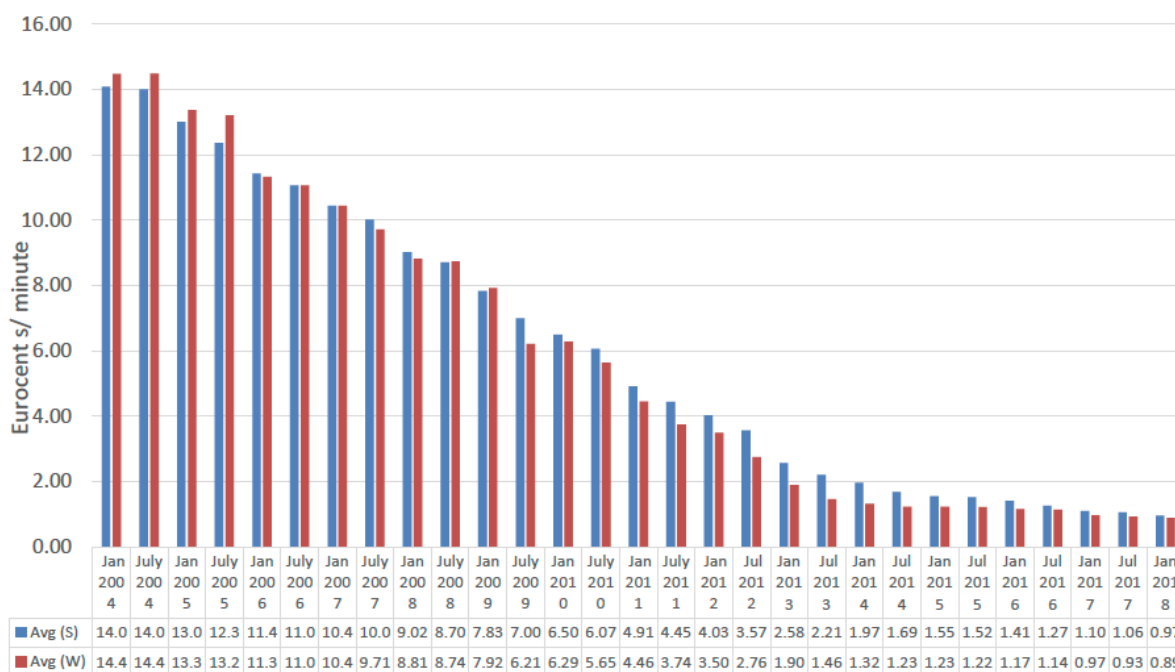
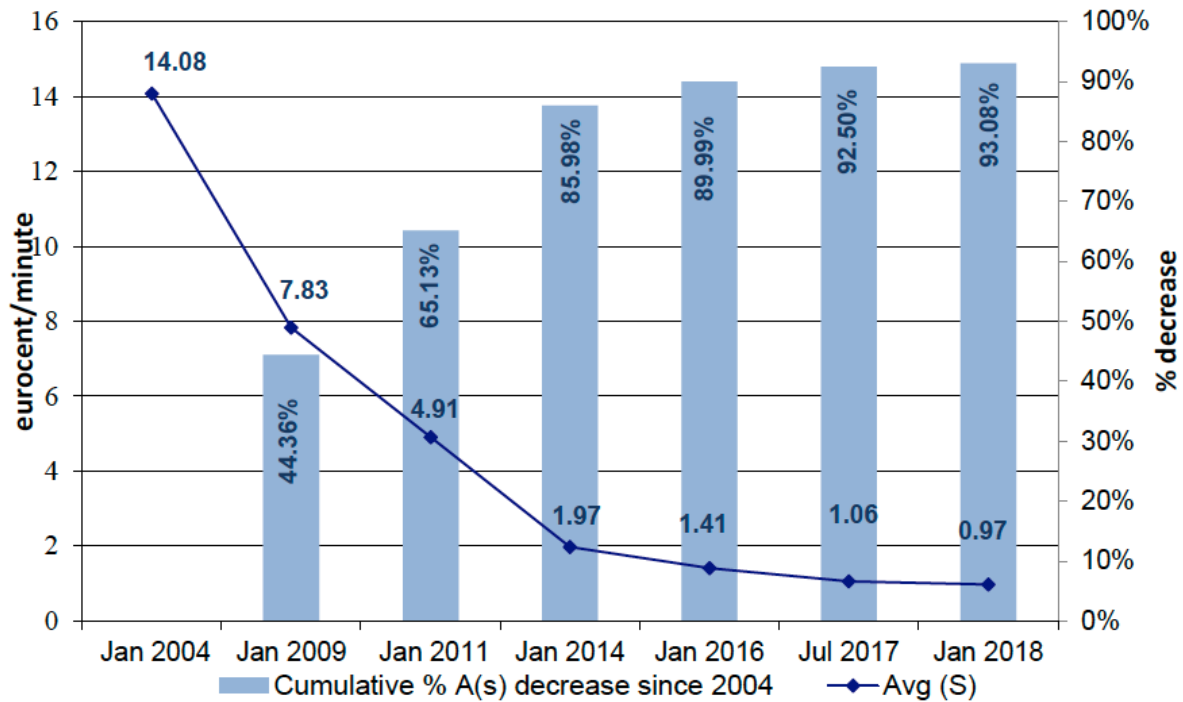


Figure 3: European MTRs simple average cumulative decline (Source: BEREC, Termination Rates at European Level, January 2018, BoR (18) 103)

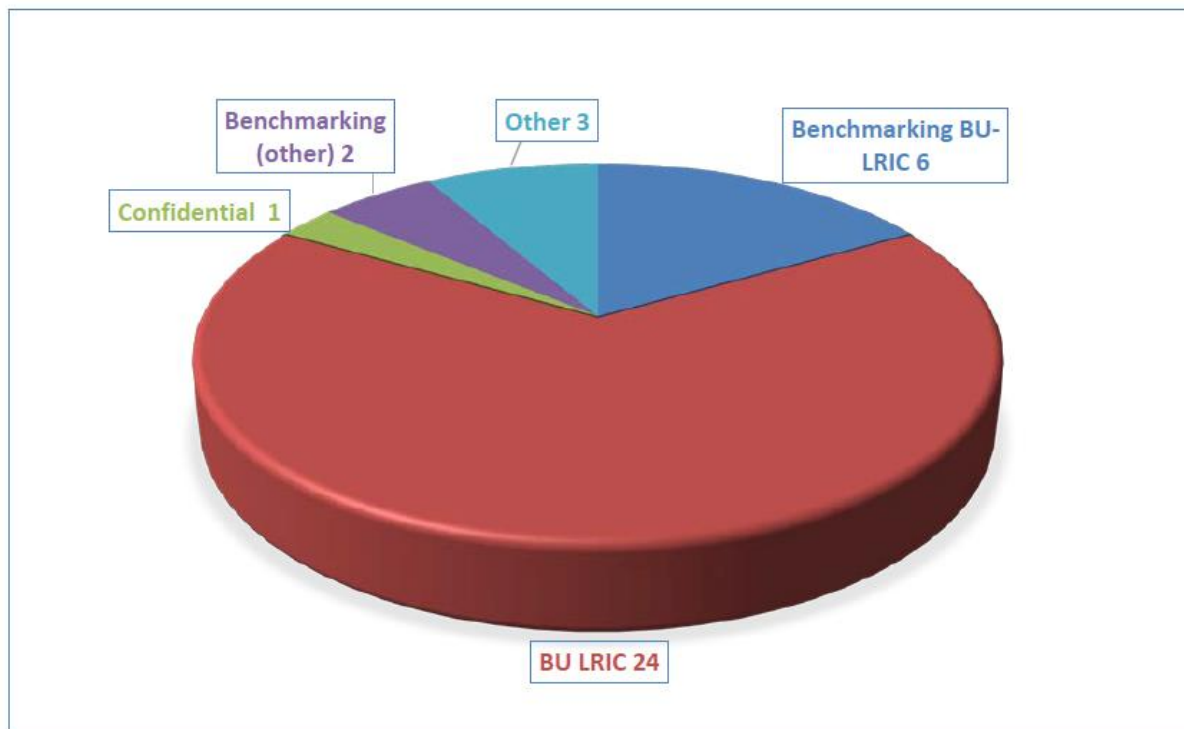


(b) Based on international experience, an MTR of 4.11 ppm looks extremely high by comparison with the rates now prevailing in all 28 EU Member States. CICRA is therefore minded to consider whether a lower level is appropriate using one or more of the following methods of assessment.

Adoption of a Long Run Incremental Cost Model (LRIC).

6.4 CICRA’s provisional view is that a price cap should broadly aim to cover the costs that an efficient MNO would incur in offering MCT, applying a long run incremental costs (LRIC) standard. This is the objective currently pursued by the large majority of EU regulators, and is widely viewed as an appropriate standard from an economic perspective, as is shown by the following chart prepared by the Body of European Regulators for Electronic Communications (BEREC).

Figure 4: Cost accounting models used by NRAs (Source: BEREC, Termination Rates at European Level, January 2018, BoR (18) 103)



Source: NRAs, BEREC

6.5 One possible approach that CICRA could use to fix the level of a price cap for MTRs would be to develop its own bespoke “bottom up” LRIC model for the purposes of assessing the efficient costs of a Guernsey MNO. CICRA’s provisional view, however, is that such a modelling exercise would not be a proportionate one to apply in Guernsey. This is because of the costs involved in constructing an appropriate and accurate model. The Ofcom MTR model for example involved significant expenditure by that regulator. CICRA considers such a scale of expenditure to be out of all proportion to the size of the Guernsey market.

Benchmarking based on EU jurisdictions

6.6 An alternative, and arguably more proportionate, approach would be to benchmark by reference to one or more other countries. This has been used by national regulators in a number of EU Member States. See Figure 4 above, which shows that 8 regulators in the EU have used a benchmarking approach for the purposes of regulating MTRs.

6.7 Benchmarking has also been used by the Channel Islands’ regulatory authorities to set a number of price controls in the past. In addition, Channel Islands operators have relied on benchmarking when setting their own market prices.

6.8 Benchmarking requires a regulator to select appropriate comparator countries. This inevitably involves a degree of judgement on the part of the regulator. Finding comparators for a small island jurisdiction has particular challenges and in CICRA’s experience there are difficulties in

basing a specific level of control on such an exercise. Generally, these benchmark indicators tend to be informative in general rather than specific in their application.

Setting the Guernsey MTR at a rate equivalent to that of the UK rate

- 6.9 CICRA's provisional view is that the level of the MTR price cap applicable in the UK could be used as an appropriate proxy for the LRIC of an efficient MNO in Guernsey. The UK model is an accessible reference point, which reflects extensive modelling work by Ofcom. The current rate of UK MTR is (from 1 June 2018 to 31 March 2019) 0.489 ppm reducing to 0.480 ppm on 1 April 2019 and subsequently reducing to 0.471 on 1 April 2020. The UK MTR is due to be reviewed for 2021.
- 6.10 The UK is the Channel Islands' closest partner in terms of 1) closeness of markets, 2) trading partner, 3) network integration and 4) the volume of conveyance of calls to and from the Channel Islands. It is an obvious reference point for CICRA to consider in assessing an appropriate level of MTRs for Guernsey.
- 6.11 It does not appear that that scalability plays any significant part in the level of the LRIC rates set for the UK and therefore those rates may be suitable for the purposes of setting MTRs in Guernsey, notwithstanding its smaller scale.

Rely on available modelling carried out in other jurisdiction/s where key features of such modelling are applicable to the Guernsey market

- 6.12 A variant on the above approach would be to take the Ofcom model, on which the UK's MTR price cap is based, and to consider its suitability for Guernsey taking account of any relevant differences in local market circumstances.
- 6.13 As noted above, the UK model is publicly available. CICRA would provisionally propose to work with external consultants familiar with the Ofcom MTR model in order to determine in what respects conditions in Guernsey may differ from the UK; and if so, whether the differences would affect the appropriate level of an MTR price cap for Guernsey.

Summary

- 6.14 For the reasons set out above, and subject to a consideration of the responses received to the present Call, CICRA is currently minded to determine the level of any price cap primarily by reference to Ofcom's cost modelling, subject to any adjustment that may be needed to ensure that the particular circumstances of the Guernsey market are properly reflected.

Question 4: Does the respondent agree with CICRA's provisional findings that the price caps for MTRs should broadly aim to cover the costs that an efficient MNO would incur in offering MCT, applying a long run incremental costs (LRIC) standard? If the respondent does not agree with CICRA's provisional findings the respondent should provide all of its analysis and assessment.

Question 5: Does the respondent agree with CICRA's provisional view that the Ofcom MTR model is a suitable proxy to be used as a LRIC MTR model to be applied to the Guernsey market, subject to verifying whether adjustments may be needed to reflect local market circumstances?

7. Summary and Next Steps

- 7.1 Stakeholders are invited to address the specific questions set out in Annex 2 below. **In addition, respondents to raise any other matters they consider relevant in the present context when responding to this Call.**
- 7.2 CICRA will consider all of the responses received, which will inform its considerations on applicable remedies and on the setting, or not, of an MTR rate.

Annex 1 – Legal and Regulatory Framework

Legal Background

Section 5(1) of the Telecommunications (Bailiwick of Guernsey) Law, 2001 (the ‘Telecoms Law’). Provides that the Authority may include in licences such conditions as it considers necessary to carry out its functions. The Telecoms Law specifically provides that such conditions can include (but are not limited to):

- conditions intended to prevent and control anti-competitive behaviour; and
- conditions regulating the prices, premiums and discounts that may be changed or (as the case may be) allowed by a licensee which has a dominant position in a relevant market.

Under Section 10(2)(c) of the Telecommunications (Bailiwick of Guernsey) Law, 2001, a licensee found to be dominant in a relevant market is obliged to provide interconnection and access on “terms, conditions and charges that are transparent and cost-orientated”.

In addition, Section 10(4) of the Telecoms Law provides for the Authority to require a licensee to justify the costs of and charges for providing interconnection or access and to show that those charges are derived from actual costs.

These provisions allow the Authority to regulate MTRs, should there be a need for regulatory intervention.

Regulatory Framework

In OUR 07/03, the OUR set out proposed findings on market dominance in Guernsey following a review of the market. The DG considered that C&WG, Wave and Airtel were all dominant in the wholesale mobile telecommunications market on their respective networks. The licences of the three MNOs, include the following condition:

“The Director General may determine the maximum level of charges the Licensee may apply for Licensed Telecommunications Services within a Relevant Market in which the Licensee has been found to be dominant. A determination may;

- a) Provide for the overall limit to apply to such Licensed Telecommunications Services or categories of Licensed Telecommunications Services or any combination of Licensed Telecommunications Services;*
- b) Restrict increases in any such charges or to require reductions in them whether by reference to any formulae or otherwise; or*
- c) Provide for different limits to apply in relation to different periods of time falling within the periods to which the determination applies”*

This condition therefore allows the Authority to regulate the prices that licensee charges for its telecommunications services in a way and for a time that it deems appropriate, provided the licensee has a dominant position in the relevant market in which those services are supplied.

Annex 2 – Summary of Consultation Questions

Question 1: Does the respondent agree that the SMP decision contained in the *Final Decision – Mobile Call Termination 2017 - Market Definition and Dominance*⁵ is still valid? If the respondent has alternative views or evidence the respondent is asked to explain those and provide all of its analysis and assessment relating to this matter to inform CICRA's considerations and next steps.

Question 2: Does the respondent agree with CICRA's provisional views that *ex-post* competition law would be insufficient to address the lack of effective competition in the markets defined and prevent the problems identified in this consultation? If the respondent does not agree with CICRA's provisional view the respondent should provide all of its analysis and assessment.

Question 3: Does the respondent agree with CICRA's provisional views on *ex-ante* remedies? If the respondent does not agree with CICRA's provisional views the respondent should provide all of its analysis and assessment.

Question 4: Does the respondent agree with CICRA's provisional findings that price caps for MTRs should broadly aim to cover the costs that an efficient MNO would incur in offering MCT, applying a long run incremental costs (LRIC) standard? If the respondent does not agree with CICRA's provisional findings the respondent should provide all of its analysis and assessment.

Question 5: Does the respondent agree with CICRA's provisional view that the Ofcom MTR model is a suitable proxy to be used as a LRIC MTR model to be applied to the Guernsey market, subject to verifying whether adjustments may be needed to reflect local market circumstances?

Question 6: Is there any other relevant matter that the Respondent wishes to raise with CICRA, which is not covered by any of the above questions?

⁵ <https://www.cicra.gg/cases/2016/t1236gj-mobile-termination-rates/t1236gj-final-decision-mobile-call-termination-2017-market-definition-and-dominance/>