

## Mobile Termination Rates (Draft Decision, OUR06/19) –

### Cable & Wireless Guernsey response

Cable & Wireless Guernsey welcomes the OUR's proposals on both the rate and period of enforcement of MTRs in Guernsey.

The OUR did not suggest a means of application of a time of day (TOD) gradient to the average rate of 6.75ppm. We propose that consistent TOD charges should apply for all operators. With the majority of mobile termination minutes occurring on C&WG's mobile network we suggest that our call volumes would provide the most accurate TOD pattern for current application in Guernsey.

Our call volume data is provided in a confidential annex, but provides the following time of day results:

<b>Period</b>	<b>Pence per minute</b>
Peak	7.79
Off-peak	6.08
Weekend	4.22

We therefore propose that these rates are adopted by all operators. We would be happy to recalculate gradients (and therefore TOD rates) annually, across the 3 year period, if considered appropriate.