



**DIGITAL JERSEY**

PROMOTING TECHNOLOGY  
AND INNOVATION



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Dear Michael,

### **Pan-Channel Islands Consultation on Mobile Termination Rates: Jersey**

I am responding on behalf of Digital Jersey to your invitation to comment on the above document.

Digital Jersey is funded by the States of Jersey to accelerate the growth of the digital economy in the Island and to act as a representative body for the digital sector. Our objectives are to:

- Enable growth of the digital sector, measured by GVA and jobs
- Enable a connected digital society
- Establish Jersey as an internationally well regarded “digital centre”

Recognising the vital role telecommunications plays in the development of digital business and the creation of an effective digital ecosystem for growth, Digital Jersey is focused on ensuring that Jersey has effective data connectivity. ‘Effective data connectivity’ is defined as providing:

- Sufficient data connectivity capacity to meet existing and future needs
- Sustained competitive pricing
- Competitive technology and services

### **Jersey Mobile Termination Rates: calls made in the UK to Jersey numbers**

We welcome the attention being given by CICRA to the costs of mobile termination rates. Our understanding is that this consultation seeks to address the charges levied by JT, Sure and Airtel against UK service providers when their customers make calls from the UK to Jersey landlines and mobile phones.

We are aware that some of the UK service providers have decided to exclude Jersey from their “free minutes” charging structures and we understand UK customers may complain to Ofcom given Jersey numbers are not required to start with international prefixes such as 00 or +: thus they appear to be domestic rather than international calls.

Jersey has extensive business and tourism links with the UK and it is important not to damage our reputation for being a competitive location to visit and do business. Thus we support action being taken to address this anomaly. However, it would be unfortunate if any reduction in the mobile termination rate made by the Jersey service providers was not reflected in any equivalent and comparable reductions by the UK service providers in their termination charges. Thus we encourage CICRA to work closely with Ofcom to ensure that Jersey service providers and thus Jersey residents are not placed at a disadvantage.



## **Cost of roaming calls made by Jersey based mobile phones when roaming in UK and Europe**

Whilst we support CICRA progressing this consultation, the charges levied by Jersey based mobile operators on their pay monthly customers whilst in the UK or Europe indicate a far more pressing mobile cost problem that directly affects Jersey residents and SME business people travelling away from the Island.

The following comparisons indicate that a substantial problem exists that has not so far been addressed by competition or regulation:

### **Example 1 Mobile calls between UK and Jersey when away from home**

*EE UK pay monthly mobile published rate for a call from Jersey to a UK number: 15.6 pence per minute.*

*JT Jersey pay monthly mobile published rate for a call from UK to a Jersey Number: 45 pence per minute.*

I.e. One Jersey supplier charges 180% more than their UK counterpart for this comparable service.

We note that the minimum published pay monthly charge for this service in Jersey is Airtel who charge 30ppm which is 90% higher than EE.

### **Example 2 Mobile calls between France and Jersey when away from home**

*Bouygues France pay monthly customer in Jersey calling France: 23 Euro cents per minute (16.8 pence)*

*Sure Jersey pay monthly customer in France calling Jersey: 80 pence per minute*

I.e. One Jersey supplier charges 370% more than their French counterpart for this comparable service.

We note that the minimum published pay monthly charge for this service is from JT at 45ppm which is 160% higher than Bouygues.

In view of the substantially higher costs charged by Jersey service suppliers when compared to their UK and French counterparts (using parallel or identical circuits), we urge CICRA to address mobile roaming call charges as soon as possible.



## Responses to questions raised in the consultation document

### Question 1

**Do respondents agree that the MTRs proposed should be introduced in the Channel Islands over the period defined by CICRA?**

We support the rationale for MTR price caps as proposed.

CICRA needs to work closely with Ofcom to ensure that the desired effect of Jersey numbers being treated as domestic numbers for UK residents is achieved in practice and that the economic benefit of this decision is not captured by the UK service suppliers. Additionally, CICRA also needs to work with Ofcom to ensure that UK service supplier call termination rates are similarly controlled.

We believe that CICRA should also commence an investigation into the retail roaming call charges being charged by Jersey service suppliers as soon as possible.

### Question 2

**Do respondents agree that it is appropriate for CICRA to change the description of the market in which the operator has been found to have SMP?**

We support conforming the description of the market to that used elsewhere.

### Question 3

**Do respondents agree that it is appropriate for CICRA to include Marathon in the scope of the regulation of MTRs?**

We have no view at this time on whether Marathon should be included.

## Improving responses to consultations

Digital Jersey remains committed to assisting CICRA agenda regarding data connectivity.

For future consultations please consider how Digital Jersey can assist in improved the circulation and response from the digital sector.

Yours faithfully

Paul Masterton  
Chairman, Digital Jersey