



## **JT's Response to CICRA's Pan-Channel Islands Consultation on Spectrum Awards in the 2.6 GHz Band**

### **Non-Confidential Version**

**16<sup>th</sup> August 2017**

#### **1 Introduction**

This response is provided by JT (Jersey) Limited and JT (Guernsey) Limited and is a confidential response, which may be published in full. Confidential elements have been removed and are denoted as [✂ redacted].

#### **2 Answers to Consultation Questions**

*Question 1: Respondent views are sought on the continued appropriateness or otherwise of the objectives to guide process and criteria for joint allocation of spectrum in the Channel Islands.*

Response to Question 1:

- JT support the view that the Jersey and Guernsey Bailiwicks should be considered together for the purposes of spectrum management and this is reflected in the design of Channel Islands mobile networks.
- We agree that competition is a useful mechanism to promote the interests of the consumer, however with available spectrum being the key to the high speed and high quality services demanded by Channel Islands mobile consumers, it is vital that sufficient spectrum is made available to the existing mobile operators. Holding spectrum in reserve for “hypothetical new entrants” is not in the interests of consumers as it limits the potential of existing mobile networks that can utilise the spectrum.
- JT have now developed its 4.5G / Pre 5G / 5G strategy and it is clear that a minimum of 1/3 of forthcoming available spectrum (such as 700 MHz, 2.6 GHz TDD and 3.5 GHz) will be required in order to deliver the peak speeds and capacities required to cater for the predicted increase in data volumes, as well as to support new categories of mobile handset.
- The provision of spectrum for Clear Mobitel, which has never been utilised, has meant that our 4G network has been operating below its capability and that the lack of sufficient spectrum now means that the Channel Islands operators are falling behind the UK in terms of peak mobile speeds.

*Question 2: Respondents are invited to comment on, with supporting evidence and explanation, current and prospective demand for spectrum in the 2.6 GHz Band that CICRA should consider in making any spectrum recommendation to Ofcom.*

Response to Question 2:

- The JT 4G network was designed and built with the expectation that 20MHz of 2.6 GHz spectrum would be available. Our key urban mobile sites were designed to operate with 20 MHz of 2.6 GHz spectrum. It was always a frustration that only 10 MHz of this spectrum was made available. We would therefore like to attain an additional 10 MHz of 2.6 GHz as soon as possible to enable our customers to attain the highest possible speeds and optimise the performance of our current 4G network.
- The addition of 10 MHz of 2.6 GHz, will allow us to increase the peak mobile speeds that our network can support, increasing theoretical maximums from [redacted]. The additional 10MHz will increase bandwidth capacity by 25% (from 40MHz to 50MHz) which will be vital in helping us maintain sufficient network quality with the data volume growth we are seeing of around [redacted] per year.
- JT has positioned itself as the fastest network and wants to retain that position. To do this it is important that we keep pace with mobile developments and continue our mobile network development as it moves through 4.5G and then eventually 5G. [redacted].
- [redacted].
- It is important that all 2.6 GHz allocations are contiguous and it is our belief that the easiest way to carry out the allocation would be to provide JT with 2640 – 2660, Sure with 2620 – 2640 and Airtel to move to 2660 – 2680. It is our understanding that JT is the only mobile network using the 2.6 GHz band currently, therefore the allocations could be made relatively quickly.