



CICRA
2nd Floor, Salisbury House
1-9 Union Street
St Helier
Jersey
JE2 3RF

21st Oct 2019

Response by Jersey and Guernsey Airtel Limited ('Airtel') to CICRA,

"Final Decision/Initial Notice - JT & Sure - Backhaul"

Airtel welcome this final decision from CICRA. We have sufficiently elaborated in our previous responses to this topic that fair, reasonable and non-discriminatory access to fiber backhaul is an essential pre-requisite to successful realization of future telecom policies of the governments of both the Bailiwicks.

The SoR process is a step in the right direction. Although it falls short of creating a dark fiber product (which already exists in one of the Bailiwicks) which is bound to revolutionize the backhaul market for telecom industry in Channel Islands. We have initiated a full review of our backhaul requirement for the next 3-5 years and will submit SoR where required to both JT and Sure (in Jersey and Guernsey). We also plan to submit an initial SoR for couple of links to kick start the process.

Above said, there is much to be desired in making the cost for fiber backhaul reasonable. While comparison between Channel Islands and UK telecoms markets is done for everything from broadband speeds, to customer service levels, mobile terminating rates to mobile bundles, it is important that the **price** of fiber backhaul, and dedicated fiber ISP is also similarly compared and brought in line. The current unrealistic pricing is the reason why Airtel has stopped promoting and selling its wireless Home Broadband. We understand CICRA is working in this regard and Airtel eagerly awaits the outcome of the consultation with the earnest hope that one of the biggest blockers to continued fast adoption of wireless data in Channel Islands will be removed and we will be able to re-introduce the product.

Jersey Airtel Limited, 1/3/5 Castle Street, St. Helier, Jersey JE2 3BT
Guernsey Airtel Limited, 45 High Street, St Peter Port, Guernsey GY1 2JT

www.airtel-vodafone.com



Trust the above meets your requirements and please feel free to get in touch with me for any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lisa Moyse', written over a light grey horizontal line.

Lisa Moyse

Head-Roaming & Regulator Affairs