

Guernsey Airtel Limited's (GAL) response to Case T1582G: GCRA's proposed decision to grant a Telecommunications Licence to Starlink Internet Services Limited dated 8/6/22.

Via Email to info@gcra.gg and [REDACTED]

15th June 2022

With reference to GCRA's proposed decision on Case T1582G Starlink Telco licence application, GAL requests GCRA's detailed response to the objections listed below:

1. Currently Guernsey has three separate telecom networks that offer mobile and broadband services. The local market structure is overcrowded in the telecommunications space for the size of market with customers having access to world class services at most competitive prices.
 - a. With 3 operators vying for a part of the small pie of the 'stagnant revenues' as evident from GCRA's annual telecom stats, GCRA's grant of new universal license to a 4th entrant 'Starlink Internet Services Limited' will put tremendous pressure on the viability of an existing multi-million-pound investment made into existing telecommunication infrastructure and services.
 - b. Further, the grant of a license to 'Starlink Internet Services Limited' in such a congested tiny market will deprive Guernsey of future investments into next generations of technologies given the increased capital and operating costs for the operator.

Therefore, request GCRA to share the commercial analysis and rational factored in to propose the entry of 4th operator 'Starlink Internet Services Limited' into such a hyper competitive saturated tiny market.

2. The license allows for wholesale access to 'Starlink Internet Services Limited'. Request GCRA to confirm the wholesale pricing available to OLO's in advance of commercial market launch to ensure there is no disadvantage in this respect. In addition, GAL requests that GCRA publishes full pricing and go to market schedule at least 12 months ahead of any trial or commercial launch.
3. With the award of a universal licence to 'Starlink Internet Services Limited', GAL requests GCRA to clarify what backhaul and bandwidth services will be made available to OLO's and at what price. GAL request a full schedule of services including timescales and pricing to be made available.
4. With regards to any 'Starlink Internet Services Limited' branding, clear distinction should be made between retail and wholesale to avoid any competitive advantage to avoid any abuse of SMP in satellite broadband. A prime example would be the branding of 'Guernsey Fibre', which is the same as Sure, thus creating an unfair perception for retail user that the service is only available through Sure.

GAL is looking forward to GCRA's response to the objections raised above.

Guernsey Airtel Limited
15th June 2022