



2<sup>nd</sup> September 2014

Our ref GDP.26.3.8

Guernsey Competition and Regulatory Authority  
Suites B1 and B2 Hirzel Court  
St Peter Port  
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Dear Sirs

**CICRA 14/41 Draft Decision : Review of the market for business connectivity, Guernsey**

Thank you for this opportunity to respond the draft decision paper. While continuing to hold the views we expressed in our response to the original consultation paper, we would like to make the following additional comments.

**Market monitoring**

Noting that the telecommunications market is a fast moving environment providing critical infrastructure and services vital to the success of the Island's economy, we urge GCRA (and JCRA) to improve its data gathering and to publish at least annual reports on the size, nature and market shares of all the operators in the market.

Without such information it is difficult to see how the market will be monitored effectively and regulatory intervention initiated when and where required.

**Off-island licensing**

We are disappointed that GCRA takes the view that there is no need to change the licence requirements for off-island, wholesale-only telcos. We continue to hold the view that easing licensing requirements in this area is an encouragement for new operators to come to what is a small, and easily misunderstood, market. The Bailiwick needs to be doing all it can to encourage such inward investment.

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### Reference offer

No process or timetable for the publication and agreement of a reference offer is proposed in the draft decision document. Given the importance and urgency of access to large scale off-island capacity we feel that a process and timetable should be decided upon at this stage.

Noting that Sure has had stable services and systems in place for many years, we feel that the creation of a reference offer is a matter of documentation rather than development. A period of one month from publication of final decision would therefore seem reasonable.

Should Sure find that it cannot meet such a timetable for, say, resourcing reasons then we feel the work should be broken down by service with access to large scale (10Gbps) off-island connections over HUGO (rather than small, purely on-island, services) expedited.

Yours faithfully

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Head of Regulatory Affairs