



22<sup>nd</sup> February 2012

Mr Michael Byrne  
Deputy Director General  
The Office of Utility Regulation  
Suites B1&B2, Hirzel Court  
St Peter Port  
Guernsey GY1 2NH

Dear Michael

**Representation re C&WG's IP Product**

JT (Guernsey) Limited ("JT") notes the proposal to exempt Cable & Wireless Guernsey ("C&WG") from the requirement to notify changes to its IP Feed product under its Licence Condition 31, 21 days in advance of the product being offered. JT also notes that if the exemption is granted, C&WG will be required to notify the Director General on the day of the changes coming into force and to put the notification prominently on its website.

JT does not object to the exemption being granted but wishes to make a point regarding the construct of the C&WG Retail IP Feed product. As all IP Feed products will require a leased line as the bearer for the service on which the IP will be provided, it is key that the pricing of the IP Feed product includes the cost of the wholesale leased line utilized to carry the IP. The OUR should ensure that the costing detail it receives from C&WG provides information on the breakdown of the product elements and that the full wholesale price of the bearer leased line is included at standard wholesale rates.

Should you have any queries relating to this response please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Gunasekara'.

**CAROL GUNASEKARA**  
**REGULATORY OFFICER - CORPORATE AFFAIRS**