



Response by Sure (Guernsey) Limited to CICRA Consultation Document 14/30: Wholesale Line Rental – Draft Decision regarding modification of licence of Sure (Guernsey) Limited

Please note that this response can be made publicly available and that no separate confidential version exists.

Sure (Guernsey) Limited welcomes the proposed implementation of Wholesale Line Rental (WLR) on its network, in conjunction with the similar proposal for JT in Jersey to be subject to the same requirement, as set out in document CICRA 14/29. Sure has been an advocate for the introduction of a standardised WLR service to the Channel Islands telecommunications market for a number of years and shares CICRA's view as to the benefits of consistent pan-CI implementation. We are therefore hopeful that all operators will benefit from its introduction, with associated consumer benefits quickly being realised as a result. The key consumer benefit is likely to be the ability to purchase a full package of telecoms services from one provider (as has been available to subscribers of UK telecoms providers for some time).

It is clear that the proposed definition for the WLR service has been open to interpretation in the past and Sure is pleased that CICRA has taken the opportunity within its current consultation documents to set out a requirement for each incumbent operator to provide wholesale calls as part of the WLR service. We believe, however, the wording used in relation to the sharing of efficiently incurred costs for the provision of the WLR service, which stipulates¹ that the costs can be recovered proportionately with each of the Other Licensed Operators that seek WLR could be open to misinterpretation and so may need to be clarified. Further, in the Background section² CICRA states that any Cost Benefit Analysis should 'take into account the benefits to all customers and not only those that might be expected to actually change provider'. Sure's view, as previously stated, having calculated minimal start-up costs for the WLR service, is that costs should specifically be recovered within the standard monthly WLR charge. This solution would address both of the above aspects, in that the underlying costs of WLR would be recovered entirely proportionately, as operators would pay solely on a per-retail customer basis. The operators with the largest existing retail customer base would therefore appropriately pick up the largest proportion of the underlying WLR costs.

Whilst the setting of the monthly WLR charge (for both Guernsey and Jersey) should be reflective of efficiently incurred costs, Sure notes CICRA's proposal to only intervene if operators are unable to agree on price. We have serious reservations about the amount of resource and time that operators could commit to this very contentious topic, when, in reality, it is evident that JT (in Jersey) and Sure (in Guernsey) are highly unlikely to voluntarily agree a price between themselves. Unfortunately, negotiations on the non-price related aspects of WLR will probably be fruitless until such time as the monthly rental charge has been defined. We therefore request that CICRA takes direct action to address this issue as a matter of priority.

¹ Page 7 of CICRA 14/30

² Page 6 of CICRA 14/30

Finally, the WLR definition, as defined on page 8 of CICRA's consultation, which we note was originally proposed by JT, does not allow for an end customer taking service via WLR to obtain an entry in the incumbent operator's published phone book. The customer's entry should be provisioned on consistent terms to that afforded to the incumbent's retail customers, e.g. that it is included in an annual printed directory and any online equivalent and that the entry is made available to other providers on request.

Sure (Guernsey) Limited

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