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Response by Jersey Airtel Limited & Guernsey Airtel Limited ('Airtel') to JCRA & GCRA via e-mail

"Draft Decision - Backhaul"

Airtel welcome this draft decision from CICRA. In our response dated Nov-2018 to the CICRA's call for information Document No. 18/43 dated 19 October 2018, we have elaborated in detail about:

- explosive growth in data traffic in Channel Islands since 4G launch in 2015
- the success of Airtel's wireless home broadband product
- how microwave is proving to be less suitable to support 4G growth
- fibre backhaul is required to future proof the investment
- 5G and any future wireless data technology will not be successful without right mobile backhaul product i.e. fibre lease line and dark fibre

Of the above, the most important is how success of wireless data and 5G are predicated on availability of fibre as a backhaul product to all opcos. Up to 4G cellular networks, the major challenges to meet the backhaul requirements were:

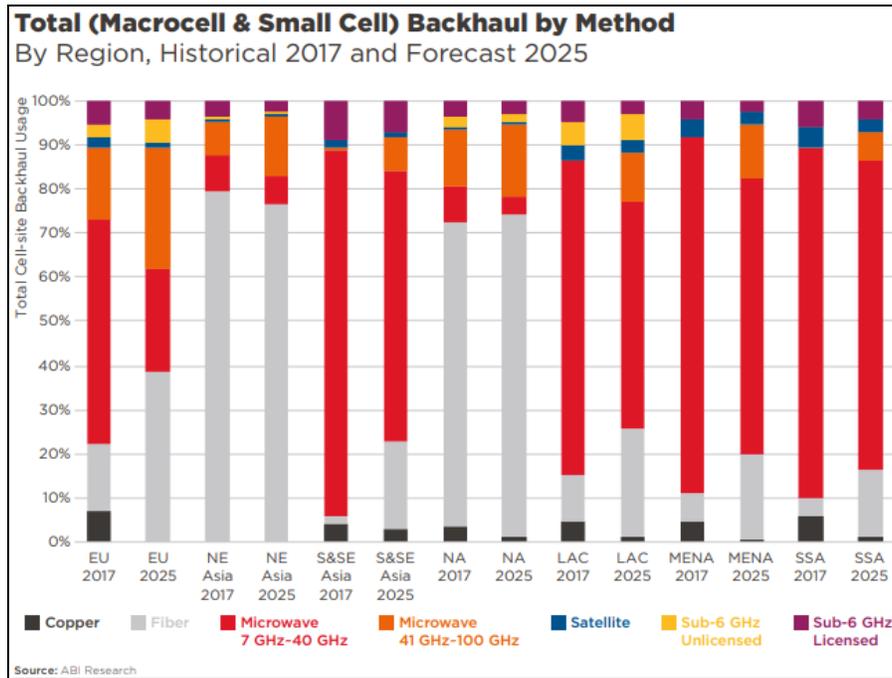
- capacity,
- availability,
- deployment cost, and
- long-distance reach

However, as FWA and 5G network capabilities and services are added to 4G cellular networks, the backhaul network will face two additional challenges that include

- ultra-low latency (i.e., 1 ms) requirements and
- ultra-dense nature of the network.

Due to the dense small cell deployment and heavy traffic cells in FWA and 5G, backhaul network will need to support hundreds of gigabits of traffic from the core network. And today's cellular backhaul networks are infeasible to meet these requirements in terms of capacity, availability, latency, energy, and cost efficiency.

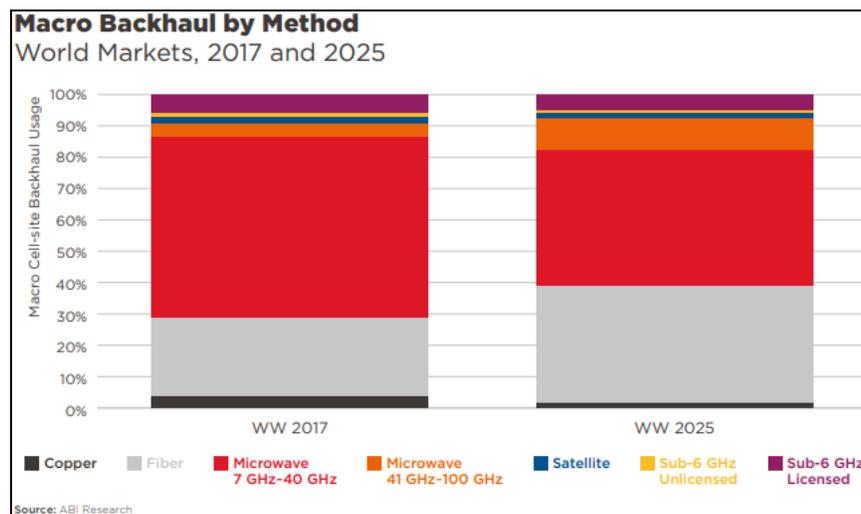
GSMA report on Mobile Backhaul options predicts that, in EU, fibre will be the dominant technology for mobile backhaul by 2025. North America and North East Asia already have majority backhaul deployment on fibre.



The report further states:

“Fiber-optic is the predominant backhaul method for **small cells** with 43.2%, followed by microwave in the 7 GHz to 40 GHz range with 35.2%. By 2025, the percentage of small cells supported by fiber-optic will grow to 56.1%. Microwave links in the 41 GHz to 100 GHz range grow from 10.4% to 13.1%”

Regarding macro cells too, the report indicates a marked shift towards fibre.:



Airtel does wish to seek more information about JTs suggestion for creating a 10Gb pan C.I backhaul solution and how they propose it will be the best option for mobile backhaul.

Having shared all of above, Airtel have made several attempts over the last few years to get variety of bandwidths and justified pricing from the SMP players. However, this has not been achieved, and, hence as a result Airtel has deliberately slowed down the promotion of their '4G internet product i.e. home broadband' due to huge constraints from high pricing of leased lines/backhaul.

In light of the above, Jersey Airtel Limited & Guernsey Airtel Limited are in agreement with CICRA's Draft Decision and welcome the proposed direction noted in the consultation dated 29th May 2019 as summarised under section 6.25:

- 1) a new specific leased line wireless backhaul solution, and
- 2) a wireless backhaul solution utilising dark fibre.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Siddharth Ahlawat', with a horizontal line underneath.

Siddharth Ahlawat
CEO