

To

Michael Byrne
Guernsey Competition Regulatory Authority

Via email

25th March 2021

Dear Michael

Response to GCRA's BCMR draft decision on market definitions and powers ref T1480GJ dated 04.03. 2021

Please see response below from Guernsey Airtel Limited in relation to the above referenced draft decision.

Airtel agrees with the strategy and reasons opted for the market segmentation including the outcomes set out in the document, however, Airtel is disappointed to see non-inclusion of below points in scope of draft decision:

1. Dark Fibre product should be a part of this consultation as it is best suited product for 4G hub sites and in future for 5G sites where high capacity is much needed. Further, there should also be an option of 'access to duct' in case the existing provider does not have capacity to spare, and the new dark fibre provisioning lead time is high, in which case Airtel can lay their own dark fibre using the duct space.
2. Product (speed) options with more granularity should be offered by all suppliers as this will help Airtel to optimally dimension on-island connectivity. In <1Gbps product segment, step sizes of 100 Mbps bandwidth should be offered to suit sites with varying capacities.
3. The Off-Island leased line should be a part of this consultation because of following reasons:
 - a. it is one of the critical connectivity with direct impact on service delivery in Guernsey,
 - b. is the most expensive connectivity amongst all, and
 - c. are provided by the same on-island providers that fall under this review.

Therefore, keeping the off-island connectivity outside the scope would negate the positive impacts achieved by BCMR within the country due to above reasons.

Airtel appreciates that authority acknowledges cost of lease lines in Guernsey are exorbitantly high compared to neighbouring markets including the UK. This prohibits Airtel from using leased lines as a preferred medium of transmission in Guernsey, thus pushing Airtel to use Microwave product which has limitations in term of speed and reliability.

Further, you will appreciate that the work from home, e-schooling, and stay in touch challenges faced by all islanders because of the Covid 19 pandemic have never more focused the need for delivering resilient, flexible, and competitive data connectivity to cover the needs of all islanders in every socio-economic group. Airtel's own experience of developing a significant base of 4G home broadband subscribers is further testament to this, and therefore, expects authority to not only address fair equitable access to Business Connectivity solutions but also pave way for additional products catering to all capacity requirements driven by customers.

As a provider of critical mobile infrastructure, Airtel is playing a vital role during the Covid-19 pandemic in keeping people seamlessly connected to their friends and family, as well as enabling remote working for our customers. One of the key learning from this pandemic is customer data consumption is continuing to grow exponentially as network is peaking during daytime too besides evening, hence, it is imperative for GCRA to expand the scope of their draft decision for all the reasons explained above and previously.

I am looking forward to GCRA's response to this letter. In meantime if you or your team require any further clarification on any of our points raised here, I would welcome the opportunity of a session to discuss it further.

Yours sincerely,



Sid Ahlawat
CEO