



JT's Non-Confidential Response to
GCRA Consultation –
Licence Modification: Fibre to the Premises
Emergency Calls

21st March 2022

1. Introduction

JT (Guernsey) Limited (“JT”) welcomes the opportunity to respond to the licence modification – Fibre to the Premise Emergency calls consultation (the “Consultation”). This is a non-confidential response and can be published in full.

2. Specific Comments

2.1 Licence Condition 13

We note that the wholesale and retail products that Sure intends to provide as part of the Guernsey fibre to the premise (“FTTP”) project requires a landline service in order to avail of a broadband service. However, it should be considered that in the future Sure may provide a fibre broadband only service where a landline service is not a requirement. In those circumstances where a user has elected not to subscribe to a landline service then Licence Condition 13 would no longer apply. However, the current wording of Licence Condition 13 would still require the provision of a Public Emergency Call Service. We suggest that this is reworded to make it clear that the Public Emergency Call Service is only a requirement of a landline service.

2.2 Proposed Guidelines

2.2.1 The guidelines as proposed are complex and could be overtly burdensome. The obligations are shared between the wholesale provider (Sure) and the retail providers (Sure, JT, Airtel). While we don’t have an issue per se with shared responsibility we believe that unless the wholesale and retail providers carefully align, there is opportunity for the detail on customers who have a BBU solution to be incorrect or missing. JT’s preference would be for one database to be developed, hosted and managed by the wholesale provider (Sure) which is accessible and updated by all retail providers. If each provider keeps a separate database there is a danger that when a customer moves premise or moves retail provider that the information on BBU will not be noted and therefore out of date or lost.

2.2.2 In addition, we would expect the wholesale provider to prioritise vulnerable customers’ services when there are network faults. Although under the proposed process Sure would have visibility of those in receipt of a Piper Lifeline and associated BBU, they would not have full visibility of other “self elected” vulnerable consumers with BBUs. We therefore believe a single database managed by the wholesale provider is the only approach that will ensure vulnerable consumers are protected.

2.2.3 Clause 28 of the guidelines require wholesale and retail providers to collect and maintain statistics in relation to the number of free BBUs/mobile provided,

their replacement details, claims refused etc. We see this requirement as overly burdensome and believe that it is in the interests of all providers (wholesale and retail) to work together to establish a single database which holds details of all BBUs supplied, replaced and the details of the customers' confirmation that they understand that the FTTP landline will cease to function during a power outage.

- 2.2.4 JT would recommend that the proposed guidelines have a review cycle built into them to view the appropriateness of them one year after implementation. This review will allow wholesale and retail providers to evaluate where changes may be necessary based on practical experience in the provision of the FTTP. After the first review period it may then be appropriate to review again after 3 years.
- 2.2.5 As per the comments made at 2.1 above, further wording changes will be necessary at clause 12 as the BBU is only required to protect the landline service and the ability to call the emergency services.