

Guernsey Airtel Limited (GAL) response to GCRA's Proposed Decision on License Modification:- Fibre to the Premises-Emergency Call T1557G dated 7 Mar 2022

Via Email to info@gcra.gg and ian.hayes@gcra.gg

21st March 2022

With reference to the draft decision on License Modification: - Fibre to the Premises-Emergency Call T1557G dated 7 Mar 2022, GAL is disappointed with the approach taken by GCRA entrusting the responsibility of BBU installation and maintenance with Retail Service Providers, which would require creating a setup equivalent to what the Wholesale Service Provider has.

The draft decision will require the service provider to implement significant efforts in terms of people, process and capex leading to the retail model of providing FTTP service becoming unviable.

GAL would appreciate the GCRA's clarification response to the concerns raised below with respect to the Proposed Draft Decision:

1. Responsibility for identification of vulnerable persons sits with the States of Guernsey (SOG). The Department of Health and Social Care is best placed to provide the details of vulnerable persons and change in circumstances on a regular basis.
2. SoG should communicate the details of vulnerable persons to the Wholesale Service Provider.
3. The GCRA should ensure that BBU installation should be part of the fibre rollout process i.e. both ONT and BBU should be installed at the customer premises at the same time. This is a standard operating process around the world and this is how it was implemented in Jersey for vulnerable people.
4. GAL has already explained enough that the use of mobile for emergency calls as a backup is not an ideal solution. The GCRA needs to understand and appreciate that evolution of technologies such as 5G/6G will lead to the sunset of 2G/3G in near future, therefore, providing a mobile handset with a 7 day battery backup will be a huge challenge since newer technologies will require high battery consumption.
5. As a retail service provider, we are completely dependent on the wholesale provider for installation and maintenance of fibre network at subscriber premises. Hence, the sole responsibility for BBU installation and maintenance should sit with Wholesale Service Provider, as in the case of Jersey.
6. We strongly believe that responsibility to maintain BBU should be with Wholesale Service Provider, therefore, corresponding statistics also needs to be maintained by Wholesale Service Provider.

While we appreciate the GCRA decision for fixing the responsibility with Sure for recording and sharing indoor mobile coverage with other operators, but for the reasons stated above, GAL strongly believes that installation and maintenance of BBU for vulnerable persons should be a co-ordinated effort between SOG and the Wholesale FTTP Service Provider.

We request the GCRA to review its final decision in line with recommendations made above to ensure continuity of emergency services, as GCRA's draft decision is wholly impracticable for the Retail FTTP Service Providers.

Guernsey Airtel Limited
21st March 2022