

Spectrum Licensing Framework

T1541G

Sure (Guernsey) Limited Proposed Licence Modification

Date: 14 October 2025

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1. Summary

- 1.1 In August 2025, the GCRA published its Spectrum Licensing Framework following public consultation.
- 1.2 The purpose of the framework is to enable the fair, efficient, and future-proof allocation of radio spectrum for 5G and successive technologies in Guernsey, in line with government policy and the evolving telecommunications landscape.
- 1.3 Overall, the framework seeks to balance rapid rollout, fair access, environmental safeguards, and regulatory oversight, ensuring that Guernsey is well positioned to benefit from the next generation of mobile telecoms services.
- 1.4 On 3 October 2025, following completion of the pre-application phase of the Spectrum Licensing Framework, Sure (Guernsey) Limited ("Sure") submitted a formal application for spectrum. The Authority has evaluated the application against the Framework criteria and has provisionally approved it, subject to the outcome of this consultation.
- 1.5 Consequently, the GCRA proposes to make the licence amendments set out below to give effect to its approval of Sure's spectrum application.

2. Structure of this document

2.1 This document is structured as follows:

Section 3	Outlines the legal background to this proposed licence modification
Section 4	Sets out the reasoning that underpins the proposed licence modification
Section 5	Set out the proposed licence modification decision and next steps
Annex A	Spectrum Allocation Guernsey (and the Channel Islands)

3. Legal background

3.1 Section 8(1) of the Telecommunications (Bailiwick of Guernsey) Law, 2001 (**Telecoms Law**) provides as follows:

"Having regard to the objectives set out in section 2 of the Regulation Law, and subject to the provisions of any States' Directions and the following provisions of this section, the [Authority] may modify a licence by amending or revoking any condition included in it or by adding any condition to it (including, subject to the provisions of section 9, any condition as to the application in relation to the licensee of the code)."

- 3.2 Before making any modifications to a licence, the GCRA must follow the procedure set out in section 8(2) of the Telecoms Law, which provides as follows:
 - "(2) Before making modifications under this section to a licence, the [Authority] shall publish, and (in the case of an individual licence) give to the holder of the licence, notice
 - (a) stating the modifications that [it] proposes to make,
 - (b) stating the reasons why [it] proposes to make those modifications, and
 - (c) specifying the time (not being less than 7 days from the date of publication of the notice) within which written representations or objections in respect of the proposed modifications may be made by interested parties."

4. Reasons for the proposed modifications

Spectrum Allocation

- 4.1 Sure's application seeks approval for the use of the following spectrum bands to provide its 5G and future telecommunications services in Guernsey:
 - a. **2x10 MHz in the 700 MHz band -** (778–788MHz and 723–733MHz)
 - b. **100MHz in the 3.6GHz band -** (3.61–3.71MHz)
- Sure proposes to deploy 5G New Radio, offering [\gg]. The company projects cumulative investment of up to £ \gg by \gg , consistent with regional fibre and 5G expansion commitments.
- 4.3 Sure's application sets out a ≯ plan for 5G deployment across the island, with commercial rollout commencing in ≯ and full island-wide coverage by ≯. Deployment will ≯ and ≯ extend to ≯, integrating ≯ to maintain continuity of service ≯.
- 4.4 Therefore, the GCRA proposes to make modifications to Schedule 4 of Sure's mobile telecommunications licence¹, to ensure that Sure's licence accurately reflects the spectrum allocations it holds for the delivery of mobile telecommunications services in Guernsey.²
- 4.5 The GCRA will also amend Schedule 4 of Sure's mobile telecommunications licence to include a condition to allow it to revoke non-utilised spectrum in accordance with the terms of the Spectrum Licensing Framework, as follows:

¹ https://www.gcra.gg/sites/default/files/licence/sure-licence-mobile-1-october-2024-non-confidential-version.pdf

² Ofcom manages spectrum on behalf of the GCRA under a delegated authority arrangement granted by the UK Government, and the GCRA regulates how spectrum is used commercially within Guernsey.

- a. "In order to ensure the efficient use of spectrum, the GCRA reserves the right, subject to reasonable written notice to the Licensed Operator and appropriate consultation, to recommend to Ofcom the revocation or reallocation of any spectrum assigned to the Licensed Operator should the Licensed Operator fail to implement its stated rollout plans as set out in its formal spectrum application to the GCRA."
- 4.6 The current and existing spectrum allocation for Guernsey (and the Channel Islands) is provided in Annex 1.

5. Proposed modification decision and next steps

- 5.1 By this Proposed Decision, the GCRA hereby:
 - a) gives notice of its approval of Sure's spectrum application.
 - b) gives notice to Sure (Guernsey) Ltd of its proposed decision to modify its mobile telecommunications licence as described in paragraphs 4.4 to 4.5 above.
 - c) gives notice to the public of the above proposed licence modifications.
 - d) requests any written objections or representations from any interested party to this proposed licence modification before 5pm on 21 October 2025 in the manner and to the address indicated below.
- 5.2 Responses can be submitted by email to info@gcra.gg or alternatively in writing to:

GCRA, Suite 4, 1st Floor,

La Plaiderie Chambers, La Plaiderie,

St Peter Port, GY1 1WG

- 5.3 All written comments should be clearly marked 'Matter T1541G: Proposed Sure Licence Modification'. The GCRA's normal practice is to publish responses on its website. If any part of a response is considered to be commercially confidential, it should be clearly marked (by highlighting the confidential sections in yellow) when the response is submitted.
- 5.4 The proposed licence modification and the reasons for it have been notified to Sure and will also be published on the GCRA website and in *La Gazette Officielle* for any public comment and/or objection.

Annex A - Spectrum Allocation Guernsey (and the Channel Islands)

hannel Island Allocations											making communications work			
F														
Uplink	quency Downlink 0 MHz	J/G	Bandwidth MHz	JT (J)	Airtel (J)	Jersey Sure (J)	Clear (J)	Newtel	Bandwidth MHz	JT (G)	Airtel (G)	nsey Sure (G)	Clear(G	
703.0 - 713.0	758.0 - 768.0		2 x 10											
713.0 - 723.0 723.0 - 733.0	768.0 - 778.0 778.0 - 788.0		2 x 10 2 x 10	JT (J)		Sure(J)								
	0 MHz				1	0 (1)		ı			I			
832.0 - 842.0	791.0 - 801.0		2 x 10			Sure(J)			2 x 10			Sure(G)		
842.0 - 852.0	801.0 - 811.0		2 x 10	JT (J)					2 x 10	JT (G)				
852.0 - 862.0	811.0 - 821.0		2 x 10		Airtel(J)				2 x 10		Airtel(G)			
	0 MHz		1					l						
880.0 - 890.0	925.0 - 935.0		2 x 10		Airtel(J)				2 x 10		Airtel(G)			
890.0 - 900.0	935.0 - 945.0		2 x 10			Sure(J)			2 x 15			Sure(G)		
900.0 - 905.0 905.0 - 915.0	945.0 - 950.0 950.0 - 960.0		2 x 5 2 x 10	JT (J)					2 x 10	JT (G)				
	00 MHz		2210						2 × 10	31 (0)				
1710.0 - 1730.0	1805.0 - 1825.0		2 x 20	JT (J)					2 x 20	JT (G)				
1730.0 - 1750.0	1825.0 - 1845.0		2 x 20		Airtel(J)				2 x 20		Airtel(J)			
1750.0 - 1770.0	1845.0 - 1865.0		2 x 20			Sure(J)			2 x 20			Sure(G)		
1770.0 - 1785.0	1865.0 - 1880.0	П	2 x 15						2 x 15					
	0 - 1900.0				DEC	T cordless	telephony	l		D	ECT cordle	ss telepho	ny	
	00 MHz 0 - 1905.0	II	5		1 1			I			ı			
	0 - 1910.0 9 - 1909.9		5						5	JT (G)				
1910.	0 - 1915.0 0 - 1920.0		5 5	JT (J)		Sure(J)			5	0. (0)				
1900 /	2100 MHz		,		<u>.</u> .	Sure(J)								
1920.0 - 1920.3 1920.3 - 1925.3	2110.0 - 2110.3 2110.3 - 2115.3		2 x 0.3 2 x 5						2 x 0.3 2 x 5					
1925.3 - 1940.1	2115.3 - 2130.1		2 x 14.8		Airtel(J)				2 x 14.8		Airtel(G)			
1940.1 - 1954.9	2130.1 - 2144.9		2 x 14.8	JT (J)					2 x 14.8	JT (G)				
1954.9 - 1969.7	2144.9 - 2159.7		2 x 14.8			Sure(J)			2 x 14.8			Sure(G)		
1969.7 - 1979.7	2159.7 - 2169.7		2 x 10		7		Clear (J)		2 x 10				Clear (G	
1979.7 - 1980.0 26 0	2169.7 - 2170.0 00 MHz		2 x 0.3						2 x 0.3					
2500 - 2520	2620 - 2640		2 x 20			Sure(J)			2 x 20			Sure(G)		
2520 - 2540	2640 - 2660		2 x 20	JT (J)					2 x 20	JT (G)				
2540 - 2560	2660 - 2680		2 x 20	(-)	Aires IV II				2 x 20	(-/	Aidel(C)			
2540 - 2560 2560 - 2570	2680 - 2680		2 x 10		Airtel(J)				2 x 10		Airtel(G)			
	00 MHz				, ,									
352	0 - 3560		40	JT (J)										
3480 - 3500	3580 - 3580 3580 - 3600		20 2 x 20					Newtel (J)						
3600 - 3630	3700 - 3730		2 2 20					(Until 31/12/26)	2 x 30			Sure(G)		
3630 - 3660	3730 - 3760		2 x 30				Clear (J) (Until 31/12/24)		2 x 30				Clear (G	
3660 - 3670 367	0 - 3710		30 40			Sure(J)								
	3760 - 3800 O GHz		40						2 x 40					
10.125 - 10.150			2 x 25						2 x 25					
10.150 - 10.225	10.500 - 10.575		2 x 75						2 x 75	JT (G)				