



Spectrum Licensing Framework

T1541G

Sure (Guernsey) Limited

Licence Modification - 2100MHz Spectrum

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1. Summary

- 1.1 In February 2025, the States of Guernsey approved the *Spectrum Policy Letter*, mandating the development of a technology-neutral spectrum management regime. The GCRA subsequently published the *Spectrum Licensing Framework* in August 2025 to enable the fair, efficient, and future-proof allocation of radio spectrum across the Bailiwick.
- 1.2 In August 2025, the GCRA published its Spectrum Licensing Framework following public consultation.
- 1.3 On 3 October 2025, Sure (Guernsey) Limited’s (“Sure”) submitted a formal spectrum application, seeking access to the 700 MHz and 3.6 GHz (5G-specific), additional non-5G spectrum and notified the GCRA of its spectrum plans related to its post Airtel merger requirements, and the launch of Co-op Mobile as the first MVNO on its network Guernsey.
- 1.4 Following consultation with Ofcom, the GCRA decided to consider Sure’s application in two parts to ensure an efficient and proportionate process. The first part, relating to the 700 MHz and 3.6 GHz bands, was assessed and approved by the GCRA Board, see [T1541G - Spectrum Awards & Licence Modifications](#).
- 1.5 For the second part, Sure seeks to expand its 2100 MHz spectrum allocation from 14.8 MHz to 20 MHz of paired spectrum. This requires re-farming of the bands held by Sure and Airtel Vodafone, due to current congestion in the band, which is shared by three mobile operators and Clear Mobitel¹, with limited unallocated spectrum at either end.
- 1.6 Assuming no competing claims, Sure proposes relinquishing its current allocation (1954.9–1969.7 MHz and 2144.9–2159.7 MHz) in exchange for the unallocated 1920–1925.3 MHz and 2110–2115.3 MHz ranges, plus Airtel’s spectrum. This would create a contiguous 20 MHz block for Sure and free up mid-band spectrum, allowing JT to expand similarly should it require additional capacity. [See Appendix 1](#)
- 1.7 Sure submits that this additional spectrum is essential to relieve 4G capacity constraints and support a larger post-merger customer base. [X X].
- 1.8 On 18 November 2025, the GCRA published a Proposed Decision to grant Sure an additional 5.3 MHz in the 2100 MHz band as part of post-merger spectrum reorganisation, and invited representations from interested parties. JT (Guernsey) Limited (JT), in its representations in

¹ Clear Mobitel is no longer a licenced operator in Guernsey, and Ofcom has begun the process of withdrawing the spectrum licences it holds in Guernsey.

response, queried the absence of references to States of Guernsey commitments under the terms the Sure/Airtel merger approval and asked for a fuller consultation on spectrum relinquishment. In response to those representations, the GCRA confirmed the proposal aligns with those post-merger commitments, they improve efficiency by creating contiguous spectrum blocks, and the proposed decision follows the Spectrum Framework. After considering the GCRA's response, JT confirmed it did not object to the Proposed Decision.

- 1.9 Consequently, the GCRA has approved the licence amendments set out below to gives 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 licence modification
Section 4	Sets out the reasoning that underpins the licence modification
Section 5	Set out the licence modification decision and next steps
Appendix A	Spectrum Allocation in the 2100 Band

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 In making the final 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."*

- i) before making the modification, consider any representations or objections received from any interested party, and*
- (ii) having followed the procedure set out in this subsection, modify the licence (and publish notice of the modification) or decide not to modify the licence (and publish notice of that decision).*

4. Reasons for the proposed modifications

Spectrum Allocation

4.1 Sure's application seeks approval for the use of the additional spectrum band as set out in the following table:

Frequency Band	Current Spectrum	Duplex	Proposed Spectrum	Additional Spectrum
2100 MHz	14.8MHz	FDD	20MHz	5.2MHz

4.2 Sure's submissions explains how its spectrum request meets the criteria of the 2025 Spectrum Licensing Framework and it has justified its need for additional spectrum to:

- a. maintain high-quality mobile service for a merged customer base;
- b. reduce network congestion and site proliferation;
- c. support efficient re-use of spectrum consistent with Ofcom's band-planning principles.

4.3 Therefore, the GCRA approves Sure's request for additional spectrum, to amend **Schedule 4** of its Mobile Telecommunications Licence, and to make the necessary modifications to ensure that the licence accurately reflects the spectrum allocations required by Sure for the delivery of its mobile telecommunications services in Guernsey.²

4.4 The current and proposed spectrum allocation are provided in [Annex 1](#).

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.

5. Modification decision and next steps

5.1 By this Final Decision, the GCRA hereby:

- a) gives notice of its approval of Sure's spectrum application.
- b) gives notice to Sure (Guernsey) Ltd of its final decision to modify its mobile telecommunications licence as described in paragraphs 4.1 to 4.4 above.
- c) gives notice to the public of the above licence modifications.

5.2 The final 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*.

Annex A - Spectrum Allocation in the 2100 Band

Operator Key:

Airtel Vodafone
Jersey Telecom
Sure