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Guernsey Competition & Regulatory Authority
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By email: info@gcra.gg

26th of Friday 2026

Matter T1677G: Proposed Licence Modification — Guernsey Numbering Scheme

Dear Sir or Madam,

We write in response to the Guernsey Competition & Regulatory Authority's ("the GCRA") Proposed Decision dated 5 June 2026 concerning the modification of telecommunications licences to give effect to the Guernsey Numbering Scheme (the "Proposed Decision"). We are a licensed operator in the Bailiwick and welcome the opportunity to comment.

These representations are submitted in accordance with section 8(2) of the Telecommunications (Bailiwick of Guernsey) Law, 2001 and before the deadline of 5pm on Friday 3 July 2026.

1. Overall position

- 1.1 We support the proposed modifications and the introduction of the Guernsey Numbering Scheme. We recognise that the framework restores a route for Licensed Operators to obtain UK telephone numbers and network codes, which has not been available since allocations were paused in mid-2024, and that it provides much-needed certainty following the clarification of Ofcom's legal position.
- 1.2 We also welcome the consolidation of numbering obligations into a dedicated Part VI, the alignment with the relevant General Conditions and the UK Plan, and the protections proposed for callers to 116 services. We have no objection to those elements.
- 1.3 Our support is, however, subject to two areas in which we ask the GCRA to provide additional clarity or safeguards. As a smaller operator with limited regulatory and compliance resource, our concerns relate principally to (a) the number-withdrawal process and (b) the new application route and determination timeline. We set these out below in a constructive spirit and would be content to discuss them with the GCRA.

2. Withdrawal of numbers (Part VI [X.10]–[X.11]; Scheme paragraphs 11 and 16)

- 2.1 We welcome the procedural protections in proposed Condition [X.11], in particular the commitment that the GCRA will inform the Licensee of any intention to recommend withdrawal, give the Licensee an opportunity to make written representations, and consider those representations before proceeding. We ask the GCRA to consider the following refinements.
- 2.2 Minimum representation period. Condition [X.11](b) refers to a “reasonable opportunity” to make representations but does not specify a minimum period. We ask the GCRA to commit to a defined minimum period (we suggest not less than 28 days), so that smaller operators with limited in-house resource have adequate time to respond before a recommendation is made. This would mirror the protective intent of section 8(2) of the Telecoms Law.
- 2.3 Proportionality and partial withdrawal. We ask the GCRA to confirm that withdrawal will be treated as a measure of last resort, that it will act proportionately, and that partial withdrawal of the specific number ranges in question will be preferred over wholesale withdrawal wherever that adequately addresses the concern. For a small operator, withdrawal of an entire allocation could be disproportionate to a localised issue and could disrupt services to end-users who bear no responsibility for the matter.
- 2.4 Clarity on the “fit and proper person” test. Paragraph 11(c)(iv) of the Scheme allows Ofcom to deny an application where the GCRA indicates the Licensee is not, or is no longer, a “*fit and proper person*”, or has “repeatedly or seriously” breached its numbering conditions. These terms are not defined. We ask the GCRA to publish guidance on the criteria it will apply and the threshold for “repeatedly or seriously”, so that operators can understand the standard expected of them and can self-assess compliance.
- 2.5 Remediation before adverse action. Paragraph 11(c)(iii) permits denial of new applications based on evidence of scams or criminal activity on numbers already allocated to a Licensee. We support measures against misuse, but ask the GCRA to confirm that, where practicable, an operator will be told of such evidence and given a reasonable opportunity to remediate before any recommendation to withdraw, or any denial of a fresh application, is made. We welcome paragraphs 12 and 13 of the Scheme (reasons for denial and the ability to re-apply) and ask that the reasons provided be sufficiently specific to allow effective remediation.
- 2.6 Continuity on cessation. Condition [X.10](b) allows withdrawal where a Licensee ceases to be a Licensee. We ask the GCRA to clarify how number portability and the continuity of service to affected subscribers will be managed in those circumstances, so that end-users are not stranded. We would welcome confirmation that withdrawal in such cases will be sequenced to allow orderly migration or porting of numbers.

3. Application route and three-week determination period (Part VI [X.2]; Scheme paragraphs 9–15)

- 3.1 We support the move to a clear, system-based application route through Ofcom and welcome the commitment in paragraph 10 of the Scheme that Ofcom will determine a completed application within three weeks. We ask the GCRA to address the following points so that the timeline operates predictably in practice.
- 3.2 Resetting of the clock. Paragraph 10 provides that, where additional information is requested, the three-week period restarts from receipt of that information. We are concerned that repeated information requests could extend the effective determination period indefinitely. We ask that Ofcom and the GCRA commit to (a) consolidating any information requests into a single request wherever reasonably practicable, and (b) an indicative outer limit for determination, so that the reset mechanism cannot be used to defer a decision without limit.
- 3.3 Access and support for smaller operators. Smaller operators apply infrequently and in low volumes. We ask the GCRA to confirm that the paper application fallback referred to in Condition [X.2](a) will remain genuinely available where Ofcom's online system is not, and that clear guidance on using Ofcom's number management system will be made available to operators in the Bailiwick.
- 3.4 Transparency of the GCRA-Ofcom channel. Paragraph 15 of the Scheme provides that Ofcom will notify the GCRA of applications and take account of GCRA information before deciding. We support appropriate cooperation, but ask the GCRA to confirm that, where information it provides to Ofcom contributes to the denial of an application, that fact and the substance of the concern will be communicated to the affected operator (consistent with paragraph 12), so that the operator can understand and address it. We would not wish decisions affecting our allocations to be influenced by a channel to which we have no visibility or right of reply.

4. Minor drafting observations

- 4.1 Reference inconsistency. The Proposed Decision is titled "T1667G" on its cover and contents pages, but respondents are directed to mark comments "Matter T1677G" (paragraph 5.2). We have used "T1677G" above. The GCRA may wish to reconcile the reference to avoid responses being mis-filed.
- 4.2 Typographical point in [X.12]. Proposed Condition [X.12] reads "...shall not charge the Subscriber to Adopt Numbers, *expect* where authorised by the GCRA." We assume "expect" should read "except".
- 4.3 Cross-reference in [X.6]. Condition [X.6] refers to 6-digit non-geographic Numbers "as defined in paragraph B3.5 of the UK Plan", while paragraph 4.15 of the Proposed Decision refers to the relevant provision differently. The GCRA may wish to confirm the cross-references to the UK Plan are consistent and current.

5. Conclusion

- 5.1 We support the Proposed Decision and the introduction of the Guernsey Numbering Scheme. Subject to the clarifications and safeguards described in sections 2 and 3, we have no objection to the proposed licence modifications and look forward to the restoration of a functioning numbering allocation process.
- 5.2 We would be pleased to provide further information or to discuss any of the above with the GCRA. Please direct any queries to the contact named below.

Confidentiality

We confirm that no part of this response is commercially confidential and it may be published in full.

Yours faithfully,

*Paul Madden
Operations Director
Base Limited t/a Genesis AV*