JT’s response to GCRA’s Guernsey Numbering Scheme proposed decision (T-1677G)

3 July 2026

1. Introduction

JT (Guernsey) Limited ("JT") welcomes the opportunity to respond to the GCRA's Proposed decision and licence modifications (T1677G) to support the implementation of the Guernsey Numbering Scheme. This response is non-confidential and can be published in full.

2. JT's comments on the proposed licence changes

2.1 Annex A point X.7 states that "The Licensee shall ensure that any Subscriber can access a hotline for missing children by using the Number "116000"." JT seeks clarification as to why this obligation is limited to the missing children hotline (116000) and does not extend to other 116XXX harmonised numbers, which are also intended to provide services of social value and are accessible to users in the Bailiwick. JT considers that, for consistency and clarity the drafting should be broadened to apply to the full range of harmonised social-value numbers.

2.2 Annex A point X.8 states that "the Licensee shall ensure that any calls or SMS to 116XXX numbers are not identified in the Subscriber's itemised billing…" JT understands that the 116XXX number range is solely configured for voice services and that SMS functionality is not supported for these services. On that basis, JT queries whether the reference to SMS is appropriate and suggests that this should either be removed or clarified, if SMS capability is intended to be supported for these services in the future.

2.3 Annex A point X.12 states that "The Licensee shall not charge the Subscriber to Adopt Numbers, except where authorised by the GCRA." JT notes that this wording differs from, and is more restrictive than, the equivalent provision in its current licence, which states "The Licensee shall not charge for allocations of numbers except where authorised and in accordance with any direction from the GCRA." JT is concerned that the proposed drafting introduces a more restrictive obligation than that contained in the current licence. The existing provision restricts charges for the allocation of numbering resources, whereas the proposed wording refers to the adoption of numbers by subscribers, a significantly broader scope which covers allocation and use of numbers. JT is not aware of any equivalent restriction within Ofcom's numbering framework or general conditions. Ofcom regulates the allocation and use of numbering resources but does not prohibit retail charges associated with the assignment of numbers to end-users. JT therefore requests that the proposed wording be removed or alternatively the current licence wording be retained to preserve the existing regulatory position.

2.4 Annex A Point 4 – references the "Guernsey Numbering Plan" however we believe the reference should be the "Guernsey Numbering Scheme" as defined in Annex A and provided in Schedule X.

3. JT's comments on the proposed Guernsey Numbering Scheme

3.1 Paragraph B7 of the Guernsey Numbering Scheme

3.1.1 This sets out the exclusions from the UK National Telephone Numbering Plan. JT does not understand the rationale for excluding all the tariff principles and maximum price provisions in relation to non-geographic and premium rate services.

3.1.2 Ofcom introduced a standardised pricing framework in 2015[1], including service charge bands and the "unbundled tariff" model (comprising an access charge and a service charge), specifically to address long-standing issues around price transparency and consumer confusion. This structure enables consumers to clearly understand the components of the price and facilitates consistent communication of call charges across providers.

3.1.3 JT is currently aligned with this UK framework, including the use of standardised service charge codes, and considers that this provides a clear and transparent pricing structure for customers. The separation of access and service charges ensures that both the communications provider and the service provider components of the charge are visible and understandable.

3.1.4 By excluding these provisions from the Guernsey Numbering Scheme, there is a risk that pricing for non-geographic and premium rate services may become less

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[1] Simplifying non-geographic numbers - Policy position on the introduction of the unbundled tariff and changes to 080 and 116 ranges

transparent, potentially reintroducing the consumer confusion that the Ofcom reforms were designed to address. This could increase the risk of bill shock and reduce comparability of prices between operators.

3.1.5 In addition, the exclusion of pricing principles appears to remove any obligation to align tariffs for other categories of calls, including “free-to-caller” number ranges such as “080”. While Ofcom’s regime requires these services to be free across both fixed and mobile networks, the absence of equivalent provisions in Guernsey creates the potential for divergence between operators. This could result in a situation where a Guernsey provider charges for a service that is free to UK consumers, or even free on other local networks, leading to inconsistency and potential consumer detriment.

3.1.6 JT therefore considers that the exclusion of tariff principles and maximum pricing provisions introduces a regulatory gap and would welcome further clarification from the GCRA on how consumer protection and pricing transparency will be ensured in their absence.

3.2 With regards to other clauses within Part B of the UK Plan, JT has further concerns with regards to the following elements:

3.2.1 “B3.1.3 - Numbering Reorganisations” section requires a process to be followed where a replacement Telephone number is Allocated. JT has retired its NTS services alongside its announcement platform and therefore cannot support the parallel running and change of number announcement requirements outlined in this clause.

3.2.2 B3.1.6 - “Geographic Numbers that relate to a Standard Area are Allocated in blocks of 10,000 but shall be treated as ten (10) units of 1,000 for the purposes of assigning numbers to Subscribers. Where a Communications Provider has assigned a number from a particular 1,000 number unit to a Subscriber, it may not assign a number from a different unit until all numbers in the first unit have been assigned.” JT can apply policies and procedures to impose the above requirements for any new ranges which are Allocated. However, JT cannot apply this retrospectively to ranges historically Allocated where numbers may have already been Assigned from blocks. Furthermore, where Enterprise customers require larger blocks of contiguous DDI numbers, these may need to be sourced from new 1,000 block units before the previous unit has been fully assigned.

3.3 Where possible, JT aligns its processes across the Channel Islands which helps to improve efficiency and simplify processes. As the JCRA is also consulting on a Jersey numbering plan, JT believes it would be beneficial for the GCRA to engage with the JCRA to create alignment in numbering frameworks and associated licence conditions.