



GUERNSEY COMPETITION
& REGULATORY AUTHORITY

Spectrum Licensing Framework

T1541G

Sure (Guernsey) Limited

Proposed Licence Modification

Date: 18 November 2025

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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 Consequently, the GCRA proposes to make the licence amendments set out below to give effect to its approval of Sure's spectrum application.

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.

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 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 proposes to approve Sure's request for additional spectrum, to amend **Schedule 4** of its Mobile Telecommunications Licence, subject to any representations received in response to this Proposed Decision, 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](#).

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 4.1 to 4.4 above.
- c) gives notice to the public of the above proposed licence modifications.

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.

- d) requests any written objections or representations from any interested party to this proposed licence modification before 5pm on 25 November 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 – Additional 2100 Spectrum'. 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 in the 2100 Band

Available	2100MHz	2110.0 (60MHz) 2170.0									
Current		5.3MHz	14.8MHz	14.8MHz	14.8MHz	10MHz	0.3MHz				
		2110.0	2115.3	2130.1	2130.1	2144.9	2144.9	2159.7	2159.7	2169.7	2170.0
Proposed	Release	20MHz		14.8MHz	14.8MHz	10MHz	0.4MHz				
		2110.0	2130.0	2130.0	2144.8	2144.8	2159.6	2159.6	2169.6	2170.0	
AV Commitment: relinquish 1x9.6MHz											

1920.0 (60MHz) 1980.0										
5.3MHz		14.8MHz		14.8MHz		14.8MHz		10MHz		0.3MHz
1920.0	1925.3	1940.1	1940.1	1954.9	1954.9	1969.7	1969.7	1979.7	1980.0	
20MHz			14.8MHz		14.8MHz		10MHz		0.3MHz	
1920.0		1940.0		1940.0	1954.8	1954.8	1969.6	1969.6	1979.6	1980.0
AV Commitment: relinquish 1x9.6MHz										