



GUERNSEY NUMBERING SCHEME

LICENCE MODIFICATION

T1677G

FINAL DECISION

Date: 17/07/2026

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1. SUMMARY

- 1.1 This final decision made pursuant to s.8 of the Telecommunications (Bailiwick of Guernsey) Law, 2001 (the “**Telecoms Law**”) implements changes to the telecommunications licences of licensed operators (“**Licensed Operators**”) in Guernsey relating to the use and management of telephone numbers (“**Final Decision**”). The changes form part of a wider framework developed by the GCRA and Ofcom following clarification of the legal arrangements under which Ofcom allocates UK telephone numbers in the Bailiwick of Guernsey (“**the Bailiwick**”).
- 1.2 The licence modifications are intended to support the introduction of the Guernsey Numbering Scheme, under which Licensed Operators in Guernsey will be able to apply to Ofcom for UK telephone numbers and related numbering resources. The changes also introduce a clearer and more modern numbering section within telecommunications licences and align local numbering obligations with relevant parts of the UK’s General Conditions of Entitlement (“**General Conditions**”) and National Telephone Numbering Plan (“**the UK Plan**”).
- 1.3 The licence modifications implemented by this Final Decision (“**Licence Modifications**”) are set out in Annex A.

2. STRUCTURE OF THIS DOCUMENT

- 2.1 This document is structured as follows:

Section 3	Outlines the legal background to the licence modifications.
Section 4	Sets out the reasoning that underpins the licence modifications.
Section 5	Sets out the responses to the Proposed Decision and the GCRA’s consideration of those responses.
Section 6	Sets out the licence modification decision.
Annex A	Sets out the modifications to telecommunications licences, including the Guernsey Numbering Scheme.

3. LEGAL BACKGROUND

- 3.1 Section 8(1) of the Telecoms Law, 2001 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:

"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."

- 3.3 In accordance with the above statutory requirements, on 5 June 2026, the GCRA published and gave notice of a proposed decision to modify the telecommunications licences of licensed operators in Guernsey relating to the use and management of telephone numbers, setting out the reasons why it proposed to make those modifications (the "**Proposed Decision**"). The GCRA invited comments and representations from all interested parties regarding the licence modifications specified in the Proposed Decision, with a deadline for comments of 5 p.m. on Friday 3 July.

- 3.4 The GCRA received two responses to the Proposed Decision from Base Limited t/a Genesis AV ("**Genesis**") and JT (Guernsey) Limited ("**JT**"). These responses are considered and addressed in Section 5 of this Final Decision.

- 3.5 Having followed the statutory procedure set out in s.8(2) of the Telecoms Law, the GCRA now proceeds to make the Licence Modifications set out in Annex A of this Final Decision pursuant to s.8(1), (2)(c)(ii) of the Telecoms Law.

- 3.6 Pursuant to s.8(3) of the Telecoms Law, the GCRA directs that the Licence Modifications shall take effect from Friday 31 July 2026.

4. REASONS FOR THE MODIFICATIONS

Background

- 4.1 The reasons for the Licence Modifications were set out in the Proposed Decision but are reproduced here for ease of reference.
- 4.2 Telephone numbers and associated numbering resources used by Licensed Operators in Guernsey have historically been administered by Ofcom as part of the United Kingdom numbering framework and the UK Plan. It was understood that provisions within the Communications Act 2003 ("**the Act**") and the Telecoms Law enabled such an arrangement to exist. Accordingly, the Bailiwick has relied, and continues to rely, on access to +44 telephone numbers and associated

numbering resources in order to enable Licensed Operators to provide telecommunications services, meet customer demand, support service expansion, facilitate competition, and ensure the continued effective operation of telecommunications networks in the Bailiwick.

- 4.3 However, during 2024, Ofcom informed the GCRA that it may not have the necessary legal powers under the Act to administer +44 telephone numbers in the Crown Dependencies, as previously understood. Ofcom subsequently confirmed that the Act did not confer jurisdiction on Ofcom to allocate telephone numbers in the Crown Dependencies, and that the Telecoms Law did not clearly provide Ofcom with the necessary authority to exercise that function in Guernsey.
- 4.4 As a consequence, Ofcom paused the allocation and reservation of telephone numbers and network codes for Licensed Operators in the Crown Dependencies until the relevant legal powers were clarified. Licensed Operators in Guernsey have therefore been unable to obtain new telephone numbers or network codes since the middle of 2024.
- 4.5 To resolve this issue, the Governments of the Crown Dependencies (including the States of Guernsey), the UK Government and Ofcom worked together during 2024 and 2025 to establish a coordinated legislative response which would enable Ofcom to continue allocating UK telephone numbers to operators in the Crown Dependencies. The objective of that work was to preserve the existing practical arrangements under which Ofcom administers UK telephone numbers for use in Guernsey and the other Crown Dependencies.
- 4.6 The Telecommunications (Bailiwick of Guernsey) Law, 2001 (Amendment) Ordinance, 2025 was subsequently made and laid before the States Assembly in March 2025. The Ordinance amended the Law to allow the GCRA to enter into formal arrangements with Ofcom for the establishment and administration of a numbering scheme for use in the Bailiwick.
- 4.7 Following that legislative amendment, the GCRA and Ofcom developed a Memorandum of Understanding (“**MoU**”) and a Guernsey Numbering Scheme. The MoU establishes the working arrangement between, and respective roles of, Ofcom and the GCRA regarding administration of telephone numbering resources in the Bailiwick, whereas the Guernsey Numbering Scheme sets out the numbering rules and processes which apply in the Bailiwick.
- 4.8 Together, these documents establish the legal and operational framework under which Ofcom will administer the allocation, reservation and withdrawal of numbering resources for use in the Bailiwick and constitute “an arrangement” within the meaning of the Telecoms Law, as amended.
- 4.9 Under the terms of the MoU, Ofcom will continue to administer relevant numbering resources from the UK National Telephone Numbering Plan for use in Guernsey. In practice, this means that Licensed Operators will be able to apply directly to Ofcom for the allocation or reservation of telephone numbers and network codes in accordance with the Guernsey Numbering Scheme. Ofcom will assess and determine those applications in accordance with the UK Plan, subject to the modifications and exclusions set out in the Guernsey Numbering Scheme.

- 4.10 The arrangement does not remove the GCRA's role as the telecommunications regulator for the Bailiwick. The GCRA will remain responsible for issuing and modifying telecommunications licences, monitoring the use of numbers in the Bailiwick, ensuring compliance with licence conditions, and taking enforcement action where appropriate. The MoU also provides for ongoing cooperation and consultation between Ofcom and the GCRA regarding changes to the Guernsey Numbering Scheme and the UK Plan. Where appropriate, the GCRA will engage with Licensed Operators before providing representations to Ofcom about proposed changes to these framework documents.

Licence modifications

- 4.11 When agreeing the terms of the MoU, Ofcom and the GCRA considered that it was appropriate and necessary to modify the licences of Licensed Operators in the Bailiwick in order to give effect to the Guernsey Numbering Scheme and ensure that Licensed Operators comply with the rules and processes governing the allocation, use and management of numbering resources in the Bailiwick. The Licence Modifications are also intended to align the numbering obligations applicable to Licensed Operators with some of those applicable to UK communications providers under the General Conditions and the UK Plan. Specifically, the changes align licences with General Conditions B1.1 to B1.11. This alignment with the General Conditions not only modernises licences in Guernsey, but also better protects end-users of Licensed Telecommunications Services in Guernsey, gives clarity and certainty to Licensed Operators regarding the process for applying for telephone numbers and having allocated numbers withdrawn, requires Licensed Operators to use numbers effectively and efficiently, and makes it easier for Ofcom to administrate the Guernsey Numbering Scheme in a way which is consistent with the rest of the United Kingdom.
- 4.12 Accordingly, the GCRA will update the numbering provisions in each issued telecommunications licence to give effect to the new numbering framework, as specified in Annex A.
- 4.13 In addition to removing existing licence conditions which are no longer required, or which conflict with the new numbering conditions, the GCRA will also make a structural change to relevant telecommunications licences. In particular, the GCRA will remove numbering-related conditions from Part III of licences and insert a new standalone Part VI ("Numbering") into each relevant fixed and mobile telecommunications licence. The GCRA considers that grouping numbering-related obligations into a dedicated section will improve the structure and accessibility of telecommunications licences and assist future administration, compliance and enforcement activities. Where appropriate, the GCRA may consider adopting a similar structural approach in relation to other licence conditions in future.
- 4.14 The introduction of a dedicated Part VI ("Numbering") will provide a clearer framework for the future introduction of additional numbering-related obligations where required. This may include obligations relating to Calling Line Identification, the leasing or use of Global Titles, emergency call

facilities, and other numbering-related matters which the GCRA may consider necessary or appropriate in the exercise of its statutory functions.

- 4.15 The Guernsey Numbering Scheme will be added as a Schedule to each relevant fixed and mobile telecommunications licence. A non-confidential version of the MoU and Guernsey Numbering Scheme shall also be placed on the GCRA's website.

'116' Non-Geographic Numbers

- 4.16 The Licence Modifications also include obligations relating to "116" telephone numbers. Under paragraph B3.5 of the UK Plan, 116 telephone numbers are harmonised 6-digit non-geographic numbers reserved for services of social value, including hotlines and helplines intended to support children, vulnerable persons and individuals experiencing distress, abuse or other forms of harm. These services include, for example, hotlines for missing children, emotional support services, and helplines for victims of abuse or exploitation.
- 4.17 The GCRA considers that users in Guernsey must be able to access these services free of charge and in a manner which protects their privacy and safety. Accordingly, the Licence Modifications require calls to 116 telephone numbers to be suppressed from itemised billing records and similar usage records made available to subscribers. This is intended to ensure that individuals seeking confidential advice, support or protection are not discouraged from contacting these services because of concerns that another person may later discover evidence of the communication through billing information or account records. In some circumstances, disclosure of calls to such services could expose the caller to intimidation, coercion, abuse, retaliation or other forms of harm.
- 4.18 The Guernsey Numbering Scheme excludes the pricing provisions contained within the UK Plan (see paragraph 7(b)). As a result, additional licence conditions are required in order to ensure that access to 116 numbers in Guernsey is provided on a free-to-caller basis. The Licence Modifications therefore require Licensed Operators to provide free access to 116 telephone numbers and to suppress records of calls to those services from itemised billing information.
- 4.19 In February 2026, Licensed Operators were asked to provide information regarding the rates charged to customers for calls to UK geographic and non-geographic telephone numbers. Where necessary, this included the likely cost and revenue implications of introducing a free-to-caller requirement for 116 telephone numbers. Responses were received from JT (Guernsey) Limited ("JT") and Sure (Guernsey) Limited ("Sure"). JT explained that [REDACTED]. Sure explained that [REDACTED].
- 4.20 Having considered the information provided by respondents, the GCRA considers that the likely costs associated with these obligations are modest and significantly outweighed by the public interest benefits of ensuring that children and vulnerable persons in Guernsey can access important support services safely, confidentially and without financial barriers. It is also considered important that individuals seeking urgent assistance from abuse support services, crisis

helplines or similar services are not discouraged from accessing those services because of concerns relating to call charges or the possibility of those communications being identified by another person through billing records or account information.

- 4.21 Accordingly, the GCRA has introduced new licence conditions (as set out in Annex A) requiring calls to 116 numbers to be provided on a free-to-caller basis and requiring calls to such services to be suppressed from itemised billing records and similar usage documentation.

5. CONSIDERATION OF RESPONSES TO THE PROPOSED DECISION

- 5.1. The GCRA received two responses to the Proposed Decision; one from Genesis and another from JT. Other Licensed Operators notified the GCRA that they did not have any comments. The GCRA is grateful to all Licensed Operators for either providing comments or confirming that they had no comments.
- 5.2. Having considered the responses received, the GCRA considers that the proposed licence conditions and Guernsey Numbering Scheme remain appropriate. The GCRA has, however, made drafting corrections and clarifications where appropriate.

Genesis' Response

- 5.3. Genesis confirmed that it supports the proposed licence modifications and the introduction of the Guernsey Numbering Scheme. The GCRA welcomes that support.
- 5.4. However, Genesis' support was subject to two broad areas where it asked the GCRA to provide further clarity. These related to:
- a. The process for withdrawal of numbers; and
 - b. The application route and determination timeline for applications for telephone numbers.
- 5.5. The GCRA responds to the points raised by Genesis below.

Withdrawal of Numbers

- 5.6. Genesis asked the GCRA to include a minimum period for representations before the GCRA recommends to Ofcom that numbers are withdrawn. Genesis suggested a period of not less than 28 days.
- 5.7. The GCRA understands why certainty on timing would be helpful, particularly for smaller operators with limited regulatory and compliance resource. However, the GCRA does not consider that it would be appropriate to include a fixed minimum period in the licence conditions. There may be circumstances in which the GCRA needs to make an urgent recommendation to Ofcom, including where there is evidence of misuse, scams, criminal activity, consumer harm or another serious issue relating to the use of numbers.

- 5.8. The GCRA considers that the protection in Licence Condition [X.11(b)] remains appropriate. This requires the GCRA to give the Licensee a reasonable opportunity to make written representations or objections before making a recommendation to Ofcom. What is reasonable will depend on the circumstances. Where it is appropriate to do so, the GCRA will take into account the size and resources of the Licensee when deciding what period is reasonable.
- 5.9. Genesis also asked the GCRA to confirm that withdrawal will be treated as a measure of last resort, and that partial withdrawal will be preferred over withdrawal of all numbers wherever that would adequately address the concern.
- 5.10. The GCRA recognises the importance of ensuring that any recommendation to withdraw numbers is properly targeted. As a public authority, and consistent with its duties and the principles of economic regulation set out in the Regulation of Utilities (Bailiwick of Guernsey) Law, 2001, the GCRA will act appropriately and proportionately. Where it is appropriate and proportionate to recommend the withdrawal of some, but not all, telephone numbers allocated to a Licensee, the GCRA may make such a recommendation to Ofcom.
- 5.11. However, the GCRA does not consider that it should state that withdrawal will only occur as a measure of last resort. There may be circumstances in which withdrawal is necessary in the first instance because of the way in which numbers are being used, or for another reason provided for under the Guernsey Numbering Scheme or the arrangements between the GCRA and Ofcom. The GCRA therefore considers that the existing wording provides the right balance between procedural protection and regulatory flexibility.
- 5.12. Genesis also asked the GCRA to clarify how number portability and continuity of service would be managed where a Licensee ceases to be licensed.
- 5.13. Where practicable and appropriate, the GCRA would expect to take account of end-user continuity, number portability and orderly migration before recommending that numbers are withdrawn. However, the GCRA cannot commit to maintaining an allocation of numbers to a person where their service provider is no longer a Licensee, nor can it fetter Ofcom's role under the Guernsey Numbering Scheme. The GCRA therefore considers that this point is best addressed through the way the arrangements are applied in the relevant circumstances, rather than through an amendment to the licence conditions or the Guernsey Numbering Scheme.

Applications for Numbers

- 5.14. Genesis asked for further clarity on the application route and the three-week determination period set out in the Guernsey Numbering Scheme. In particular, Genesis noted that the three-week period restarts where Ofcom requests additional information, and asked that Ofcom and the GCRA commit to consolidating information requests wherever practicable and to an indicative outer limit for determination.

- 5.15. The GCRA recognises the importance of a predictable application process. However, applications for Guernsey telephone numbers will be administered by Ofcom through the Guernsey Numbering Scheme. The process reflects Ofcom’s approach to numbering applications under the UK numbering framework. The GCRA does not consider that it would be appropriate to introduce a separate Guernsey-specific determination process or outer time limit through the licence conditions or the Guernsey Numbering Scheme.
- 5.16. The GCRA notes that the Guernsey Numbering Scheme requires Ofcom to determine applications within three weeks of receiving a completed application, or within three weeks of receiving any additional information requested by Ofcom. Any request for additional information must be relevant to the application and must not place an undue burden on the Licensee. The GCRA considers that this provides an appropriate framework for applications, while allowing Ofcom to request the information it needs to assess applications properly.
- 5.17. Genesis also asked the GCRA to confirm that the paper application process will remain available where Ofcom’s online number management system is unavailable, and that clear guidance will be available to smaller operators.
- 5.18. The GCRA notes that the proposed licence condition X.2(a) and the Guernsey Numbering Scheme already provide that Licensees may apply using Ofcom’s online number management system or, if that system is unavailable, the application form made available on Ofcom’s website. The availability and operation of Ofcom’s application systems is an operational matter for Ofcom. The GCRA considers that the existing wording appropriately reflects the process that will apply.

Fitness, Breaches and Remediation

- 5.19. Genesis asked the GCRA to publish guidance on the “fit and proper person” test and the threshold for “repeatedly or seriously” breaching numbering conditions.
- 5.20. The GCRA understands that operators may wish to understand how these concepts will be applied. However, Ofcom is responsible for determining applications for the allocation or reservation of telephone numbers under the Guernsey Numbering Scheme. While Ofcom may take account of information provided by the GCRA, it is for Ofcom, as administrator of the Guernsey Numbering Scheme, to determine whether a Licensee is a fit and proper person to whom numbers should be allocated or reserved. The GCRA therefore does not consider that it would be appropriate for it to define or restrict Ofcom’s assessment through licence conditions, the Guernsey Numbering Scheme or this Final Decision.
- 5.21. The GCRA also does not consider it appropriate to define exhaustively what may constitute a “repeated” or “serious” breach of numbering conditions. A wide range of conduct could be relevant, depending on the circumstances. Detailed guidance would risk narrowing the circumstances in which the GCRA may provide relevant information to Ofcom or take appropriate regulatory action. However, the GCRA would not generally expect minor, isolated or technical issues to meet that threshold. The wording is intended to capture matters such as serious non-

compliance, repeated non-compliance, failure to remedy known issues, misuse of numbers, or conduct raising concerns about whether numbers would be used effectively, efficiently and safely.

- 5.22. Genesis also asked the GCRA to confirm that, where practicable, operators will be told of concerns and given a reasonable opportunity to remediate before any denial of a fresh application.
- 5.23. This point relates to the application process administered by Ofcom under the Guernsey Numbering Scheme. It will be for Ofcom to determine whether an application should be denied and what information it is appropriate to share with the Licensee when doing so. In some cases, particularly where there is suspected criminal activity, an ongoing investigation or sensitive enforcement-related information, it may not be appropriate for Ofcom or the GCRA to disclose information in full before a decision is made.
- 5.24. The GCRA notes that the Guernsey Numbering Scheme already requires Ofcom to provide reasons where it denies an application. Those reasons must enable the Licensee to understand the steps it would need to take to address Ofcom's concerns. A Licensee may then submit a new or amended application after it has addressed those concerns. The GCRA considers that this provides an appropriate safeguard without introducing a separate pre-denial remediation process.

Information sharing between the GCRA and Ofcom

- 5.25. Genesis asked the GCRA to confirm that, where information provided by the GCRA to Ofcom contributes to the denial of an application, that fact and the substance of the concern will be communicated to the affected operator.
- 5.26. The GCRA recognises the importance of transparency in regulatory processes. At the same time, information shared between the GCRA and Ofcom may include confidential, sensitive or enforcement-related information, including information relating to suspected scams or criminal activity. It may therefore not always be appropriate or lawful for the GCRA or Ofcom to disclose that information in full.
- 5.27. Where Ofcom denies an application, the Guernsey Numbering Scheme requires Ofcom to provide reasons which enable the Licensee to understand any steps it would need to take to address Ofcom's concerns. The GCRA considers that this provides an appropriate safeguard. The GCRA therefore does not consider that an additional disclosure obligation should be added to the licence conditions or the Guernsey Numbering Scheme.

JT's Response

- 5.28. JT raised a number of points regarding the proposed licence conditions and the Guernsey Numbering Scheme. The GCRA has considered each of these points.

116 Numbers

- 5.29. JT asked why proposed Licence Condition [X.7] refers specifically to the missing children hotline, 116000, rather than all 116XXX harmonised numbers for services of social value.
- 5.30. Licence Condition [X.7] reflects the obligation placed on UK communications providers under Ofcom's General Condition B4.5. The condition has been included in Guernsey fixed and mobile licences to align with Ofcom's approach to 116XXX non-geographic numbers of social value.
- 5.31. The GCRA also notes that Licence Condition [X.7] sits alongside other 116 number obligations. Licence Condition [X.6] requires Licensees to ensure that calls to 116XXX numbers are free of charge to the caller, while Licence Condition [X.8] requires calls to 116XXX numbers to be suppressed from itemised billing and other records. The GCRA therefore does not consider it necessary to broaden the scope of Licence Condition [X.7].
- 5.32. JT also queried the reference to SMS in Licence Condition [X.8], noting that JT understands 116XXX numbers to be configured for voice services and not SMS.
- 5.33. The GCRA agrees with JT's understanding and is not aware of SMS services being available for 116XXX numbers. The GCRA has therefore removed the reference to SMS from the modified licence conditions.

Charging for numbers

- 5.34. JT raised concerns regarding Licence Condition [X.12], which provides that the Licensee shall 'not charge the Subscriber to Adopt Numbers, except where authorised by the GCRA'. JT considered that this wording may be broader than the equivalent provision in its current licence, which refers to charges for "allocations of Numbers".
- 5.35. The GCRA has carefully considered this point. The GCRA does not agree that Licence Condition [X.12] introduces a materially new regulatory obligation. The existing numbering condition already prohibits Licensees from charging customers for Numbers unless authorised by the GCRA. The purpose of that condition, as explained when the original licence conditions were introduced¹, was to prevent Licensees from charging customers for any number allocated unless authorised by the regulator.
- 5.36. Under the new numbering framework, the term "Allocate" refers to the allocation of numbers by Ofcom under the Guernsey Numbering Scheme. It is therefore appropriate for the licence condition dealing with charges to Subscribers to refer to the "Adoption" of Numbers. This more accurately reflects the way in which Licensees assign, use or otherwise make numbers available when providing services to Subscribers.

¹ [Telecommunications Licence Conditions; Consultation Paper](#) – see page 12.

- 5.37. The GCRA also notes that Licence Condition [X.12] does not prevent Licensees from charging Subscribers for telecommunications services which use Numbers as part of those services. The condition is intended to prevent Licensees from charging Subscribers for the Number itself, unless authorised by the GCRA.
- 5.38. However, the GCRA considers that the drafting of Licence Condition [X.12] could be clarified. The GCRA has therefore amended the condition so that it refers to charges to a Subscriber “for the Adoption of Numbers”, rather than charging a Subscriber “to Adopt Numbers”. This clarification better reflects the regulatory intent of the provision and does not alter the substance of the condition.

Tariff principles and maximum prices

- 5.39. JT asked the GCRA to clarify why the Guernsey Numbering Scheme excludes the UK National Telephone Numbering Plan provisions relating to tariff principles and maximum prices. JT considered that excluding these provisions could create a regulatory gap and increase the risk of less transparent pricing, consumer confusion and bill shock.
- 5.40. The GCRA recognises the importance of tariff transparency and consumer protection. However, the GCRA does not consider that it is appropriate to import Ofcom’s tariff principles and maximum price provisions into the Guernsey Numbering Scheme at this stage.
- 5.41. Under section 2(1) of the Regulation of Utilities (Bailiwick of Guernsey) Law, 2001, the GCRA has a duty to protect the interests of consumers and other users in the Bailiwick in respect of the prices charged for, and the quality, service levels, permanence and variety of, utility services. The GCRA considers that it should retain responsibility for considering pricing and tariff principles in Guernsey, so that any intervention can take proper account of the local context and the GCRA’s statutory duties.
- 5.42. As part of engagement with Licensed Operators earlier in 2026, the GCRA considered the prices charged for services including 080 non-geographic numbers and premium rate services. That engagement did not indicate a significant divergence between the prices charged by UK operators and those charged in Guernsey, to the extent that the GCRA considers intervention is required at this stage. The GCRA has also not received complaints or market information indicating that consumers do not sufficiently understand call charges, or that intervention is required at this time.
- 5.43. The GCRA does not agree that excluding Ofcom’s tariff principles from the Guernsey Numbering Scheme creates a regulatory gap or increases the risk that pricing will become less transparent or more confusing. The UK National Telephone Numbering Plan does not currently apply in Guernsey. Accordingly, not introducing Ofcom’s tariff principles at this time does not remove an existing obligation or change the current regulatory position.
- 5.44. If, however, evidence emerges that consumers are being harmed by unclear pricing, bill shock or divergence in call charges, the GCRA can consider whether further measures are required. This

Final Decision does not prevent the GCRA from considering tariff transparency, free-to-caller obligations or other consumer protection measures separately where appropriate. The GCRA has already decided to take specific action in this licence modification to ensure that calls to 116XXX numbers are free to the caller.

UK National Telephone Numbering Plan B3.1.3

- 5.45. JT raised concerns regarding paragraph B3.1.3 of the UK National Telephone Numbering Plan, which relates to numbering reorganisations. JT explained that it has retired its NTS services and announcement platform and cannot support the parallel running and changed number announcement requirements referred to in that provision.
- 5.46. The GCRA notes that this issue was not raised by JT during the GCRA's earlier engagement with Licensed Operators. In a request for information issued to JT on 28 January 2026, the GCRA asked whether, in addition to the exemptions identified in that request, there were any other aspects of the UK National Telephone Numbering Plan that should be exempted from the Guernsey Numbering Scheme. JT did not identify paragraph B3.1.3 as an issue in response to that request.
- 5.47. The MoU and Guernsey Numbering Scheme have now been finalised and agreed by Ofcom and the GCRA. The GCRA therefore does not consider that further adjustments to the Guernsey Numbering Scheme should be made at this stage unless there are compelling reasons to do so.
- 5.48. The GCRA does not consider that JT's comments provide a compelling reason to exempt paragraph B3.1.3. The GCRA notes that the requirement for a dual-running period applies "wherever technically possible". This means that the provision does not require a parallel running period where an operator is unable to facilitate one for technical reasons.
- 5.49. The GCRA also notes that a numbering reorganisation under section 62(3) of the UK Communications Act 2003 is likely to be rare and, if it occurred, could have a significant wider impact. In those circumstances, the GCRA would expect Licensed Operators to engage with the GCRA and Ofcom on what is technically and operationally possible. The GCRA therefore does not consider it necessary or appropriate to exempt paragraph B3.1.3 from the Guernsey Numbering Scheme.
- 5.50. The GCRA also notes that no other Licensed Operator has raised concerns about its ability to support parallel running or changed number announcements. In those circumstances, the GCRA does not consider it appropriate to exempt part of the UK National Telephone Numbering Plan on the basis of the position raised by a single Licensee, particularly where the provision itself recognises that parallel running is required only where technically possible.
- 5.51. Accordingly, while the GCRA notes JT's current position, it has concluded that paragraph B3.1.3 of the UK National Telephone Numbering Plan should not be exempted from the Guernsey Numbering Scheme at this time.

UK National Telephone Numbering Plan B3.1.6

- 5.52. JT also raised a concern regarding paragraph B3.1.6 of the UK National Telephone Numbering Plan, which relates to the assignment of geographic numbers from 1,000 number units. JT explained that it can apply policies and procedures to new ranges, but cannot apply the requirement retrospectively to historical allocations where numbers may already have been assigned from different blocks. JT also noted that enterprise customers may require larger blocks of contiguous DDI numbers.
- 5.53. The GCRA recognises that some requirements in the UK National Telephone Numbering Plan may need to be applied in light of existing historical allocations and assignments. The GCRA would not expect Licensees to take steps that are not practicable in relation to numbers already assigned before the licence modifications take effect. However, Licensees should take appropriate steps to comply with the relevant requirements when making new assignments and when managing numbering resources going forward.
- 5.54. The GCRA therefore does not consider it necessary to amend the licence conditions or the Guernsey Numbering Scheme in response to this point.

Minor drafting observations

- 5.55. Genesis and JT identified a small number of minor drafting points, including an inconsistency in the matter reference, a typographical error in proposed Licence Condition [X.12], a reference to the “Guernsey Numbering Plan” rather than the “Guernsey Numbering Scheme”, and a query regarding cross-references to the UK National Telephone Numbering Plan.
- 5.56. The GCRA is grateful to Genesis and JT for identifying these points. The GCRA has taken them into account and has made drafting corrections where appropriate. These changes do not alter the substance or effect of the licence modifications.

Conclusion

- 5.57. Having considered the responses received, and noting that other Licensed Operators confirmed that they had no comments, the GCRA has decided to proceed with the licence modifications, subject to the minor drafting corrections and clarifications identified above.
- 5.58. The GCRA considers that the licence modifications remain necessary and appropriate to give effect to the Guernsey Numbering Scheme and to restore a functioning process for the allocation, reservation and administration of telephone numbers for use in the Bailiwick.

6. DECISION

- 6.1. The GCRA hereby gives notice to 5th Dimension (Guernsey) Ltd, Base Limited t/a Genesis AV, BT Jersey Ltd (Guernsey), Business Telecom Limited, Flo Connect Ltd, Gamma Telecom Holdings Ltd (Guernsey), JT (Guernsey) Ltd, Logicalis Guernsey Ltd, GuernseyTel Limited, Offshore Leisure Limited t/a Coop Mobile, Richard Bird t/a Links Communications, Starlink Internet Services Limited, Sure (Guernsey) Limited, TP Global Operations Limited t/a 1GLOBAL of its final decision to modify their telecommunications licence(s) as set out in Annex A.
- 6.2. This licence modification decision has been notified to holders of those licences to which the modifications relate. It will also be published on the GCRA website and in La Gazette Officielle.
- 6.3. The licence modification shall take effect on 31 July 2026.

ANNEX A

Licence modifications

1. The GCRA amends Licence Condition 1 (Definitions and Interpretation) in each Telecommunications Licence by inserting/amending the following definitions:

“Allocate” / “Allocation”: means, in relation to a Number, allocation of that Number by Ofcom under the Guernsey Numbering Scheme and the term “Allocated Number” shall be construed accordingly;

“Adopt” / “Adoption”: means the doing of any of the following by a Licensee in relation to Allocated Numbers (whether or not such Numbers are Allocated to that Licensee):

- (a) Assigning or transferring that number to a particular Subscriber or Telecommunications Apparatus;
- (b) Using that Number for identifying a service or route used by that Licensee or any of its Subscribers;
- (c) Using that Number for identifying a communication as one to be transmitted by that Licensee;
- (d) Designating that Number for use in selecting a service or the required elements or characteristics of a service; or
- (e) Authorising the use of that Number by others for any of the following purposes:
 - i. Identifying the destination for, or recipient of, an Electronic Communication;
 - ii. Identifying the origin, or sender, of an Electronic Communication;
 - iii. Identifying the route of an Electronic Communication;
 - iv. Identifying the source from which an Electronic Communication, Licensed Telecommunications Service or Licensed Mobile Telecommunications Service may be obtained or accessed;
 - v. selecting the service that is to be obtained or accessed, or required elements or characteristics of that service;
 - vi. Identifying the Licensee by means of whose network or service an Electronic Communication is to be transmitted, or treated as transmitted.

“Assigned”: means (in relation to Numbers) where Numbers are transferred to end users, i.e. individuals and businesses.

“Electronic Communication”: means a communication for transmission by means of a Licensed Telecommunication Network or Licensed Mobile Telecommunications Network.

“General Conditions”: means Ofcom’s General Conditions of Entitlement published on its website and as may be amended from time to time;

“Guernsey Licence”: means a telecommunications licence granted to a telecommunications operator by the GCRA pursuant to section 2 of the Telecommunications Law;

“Guernsey Numbering Scheme”: means the numbering scheme for the Bailiwick of Guernsey established and maintained by Ofcom;

“Numbering Scheme”: means the method adopted or to be adopted for allocating and re-allocating a Number;

“Short Message Service” or “SMS”: means a text message delivered to a Subscriber’s handset or, if SMS is superseded or withdrawn, an equivalent text communication sent directly to the Subscriber’s handset.

“Sub-allocate”: means where Numbers are transferred by a Licensee to another Licensee;

“UK Act”: means the Communications Act 2003 (as amended)

“UK Plan”: means the National Telephone Numbering Plan published by Ofcom pursuant to section 56 of the UK Act and setting out the telephone numbers available for allocation in the UK and any restrictions on how they may be adopted or used in the UK.

2. The GCRA will remove the Licence Condition entitled “Numbering” from each mobile and fixed telecommunications licence as follows:

[X] NUMBERING

- ~~3.1 — The Licensee shall use only those Numbers that are allocated to it for the purpose of terminating messages on the Licensed Telecommunications Network and shall comply with any directions concerning use and allocation which are issued by the GCRA from time to time.~~
- ~~3.2 — The Licensee shall manage any Numbers allocated to it with a view to conserving Numbers as a public resource and shall maintain a record of the status of all Numbers allocated to it and on request, shall provide that information to the GCRA.~~
- ~~3.3 — The Licensee shall not charge its customers for allocations of Numbers except where authorised and in accordance with any direction from the GCRA.~~
- ~~3.4 — The Licensee shall comply with any directions issued by the GCRA in respect of Number Portability.~~

3. The GCRA will insert a new Part VI into each fixed and mobile telecommunications licence as follows:

PART VI: NUMBERING

- [X.1] This Licence incorporates and is subject to the Guernsey Numbering Scheme, which forms Schedule [X] of this Licence. The Licensee shall comply with the terms of the Guernsey Numbering Scheme.
- [X.2] If the Licensee wishes to obtain an Allocation or reservation of Numbers in the UK Plan, it must:
- (a) use Ofcom's online number management system or, if that system is unavailable, the application form made available on the Ofcom website from time to time;
 - (b) provide such information as is required by such system or application form; and
 - (c) provide to Ofcom, on request, any other information considered by Ofcom to be relevant to the application, and the supply of which does not place an undue burden on the Licensee.
- [X.3] The Licensee shall not Adopt Numbers from the UK Plan unless:
- (a) those Numbers have been Allocated to the Licensee; or
 - (b) the Licensee has been authorised (either directly or indirectly) to Adopt those Numbers by the person to whom those Numbers have been Allocated.
- [X.4] Where a Number has been Adopted under [X.3(b)], the Licensee shall comply with the conditions of this Licence and any directions issued to the Licensee by the GCRA under this Licence or the Telecommunications Law.
- [X.5] The Licensee shall comply with all applicable restrictions and requirements as are set out in the UK Plan unless any restrictions or requirements are stated in the Guernsey Numbering Scheme as not applying in the Bailiwick.
- [X.6] The Licensee shall provide access to services of social value via 6-digit non-geographic Numbers, as defined in paragraph B3.5 of the UK Plan, free of charge to the caller.
- [X.7] The Licensee shall ensure that any Subscriber can access a hotline for missing children by using the Number "116000".
- [X.8] In accordance with Condition [X.4]², the Licensee shall ensure that any calls to 116XXX Numbers are not identified in the Subscriber's itemised billing or any other records that the Licensee makes available to the Subscriber.
- [X.9] The Licensee must:

² "The Licensee shall provide each of its Subscribers with an acceptable level of itemised billing for international calls, at no additional charge. On request by a Subscriber, the Licensee shall also provide itemised billing for local calls at a reasonable charge. The itemised bill produced by the Licensee shall in all cases provide sufficient detail to facilitate verification of charges incurred by the Subscriber in using the Licensed Mobile Telecommunications Services. Calls which are free of charge to the User because they are calls to the emergency numbers and the emergency access codes referred to in Condition 13.2, and similar codes, shall not be identified in the subscriber's itemised bill."

- (a) ensure that any Numbers that have been allocated to it are, and continue to be, used effectively and efficiently. This includes, but is not limited to, ensuring that Numbers allocated to it are not misused, including to facilitate scams or other criminal activity.
- (b) take all reasonably practicable steps to ensure that any Numbers that the Licensee has Sub-allocated or Assigned to a customer are being used effectively and efficiently. This includes, but is not limited to, ensuring that Numbers so Sub-allocated or Assigned are not misused, including to facilitate scams or other criminal activity.

[X.10] In the event that:

- (a) the Licensee fails to comply with a direction given by the GCRA under the Telecommunications Law in respect of the Licensee's use of Numbers from the UK Plan; and/or
- (b) the Licensee ceases to be a Licensee under Section 2 of the Telecommunications (Bailiwick of Guernsey) Law, 2001, as amended.

the GCRA may recommend to Ofcom that Ofcom withdraw some or all of the Numbers allocated to the Licensee.

[X.11] Where the GCRA considers it is appropriate for Ofcom to withdraw all or some of the Numbers allocated to the Licensee, the GCRA will:

- (a) inform the Licensee that the GCRA intends to recommend to Ofcom that those Numbers are withdrawn (**Proposed Recommendation**); and
- (b) before it makes any Proposed Recommendation give the Licensee a reasonable opportunity to make written representations and/or objections in relation to that Proposed Recommendation; and
- (c) consider any such written representations and/or objections before deciding whether or not to proceed with the recommendation.

[X.12] The Licensee shall not charge the Subscriber for the Adoption of Numbers, except where authorised by the GCRA.

[X.13] The Licensee shall comply with any directions issued by the GCRA in respect of Number Portability.

4. The GCRA will add a schedule to each fixed and mobile telecommunications licence containing the Guernsey Numbering Scheme as follows:

Guernsey Numbering Scheme

A. Background

1. Section 11(1A) of the Telecommunications (Bailiwick of Guernsey) Law, 2001, as amended (the **Law**) explains that:

For the avoidance of doubt, and in accordance with section 1(2) of the Communications Act 2003 as extended to the Bailiwick, under subsection (1) [of the Law] the [Guernsey Competition and Regulatory Authority (GCRA)] may enter into an arrangement with Ofcom under which Ofcom shall have the function of establishing a Guernsey Numbering Scheme in the Bailiwick, including (for the avoidance of doubt) the power to do anything incidental or conducive to the carrying out of that function, and such a scheme shall be susceptible to modification by Ofcom after consultation with the [GCRA].”

2. This document constitutes the numbering scheme for the Bailiwick of Guernsey (the **Guernsey Numbering Scheme**), as defined in section 31 of the Law. It has been established pursuant to section 11(1A) of the Law and the arrangements set out in the Memorandum of Understanding between Ofcom and the Guernsey Competition and Regulatory Authority (**GCRA**) dated [...], as amended.
3. In accordance with section 11 of the Law, so far as is practicable and in accordance with international best practice, this Guernsey Numbering Scheme:
 - (a) takes into account the needs of licensees and users in the Bailiwick; and
 - (b) promotes the efficient use of numbers in the Bailiwick.
4. This Guernsey Numbering Scheme, including the steps Ofcom will carry out in accordance with this Guernsey Numbering Scheme, will facilitate the carrying out of Ofcom’s numbering functions under sections 1(2) and 56 – 63 of the UK Communications Act 2003 (the **UK Act**) and section 11 of the Law.
5. References to licensees in this Guernsey Numbering Scheme are references to licensees as defined in section 31 of the Law. Except in so far as the context otherwise requires, other words or expressions shall have the meaning assigned to them in the Law.

B. Application of the UK National Telephone Numbering Plan

6. Ofcom is required under section 56 of the UK Act to publish a National Telephone Numbering Plan, setting out the telephone numbers available for allocation in the UK and any restrictions on how they may be adopted or used in the UK (the **UK Plan**). The UK Plan is published on Ofcom’s website and amended from time to time.
7. For the purposes of this Guernsey Numbering Scheme the UK Plan should be read as setting out the telephone numbers available for allocation in the Bailiwick and any restrictions on how they may be adopted or used in the Bailiwick subject to the following parts being excluded:
 - (a) Section B3.8 of the UK Plan relating to Global Titles;
 - (b) Section B4 and Section C6 of the UK Plan relating to tariff principles and maximum prices;

- (c) References to 'Applicable tariff principles and maximum prices' in Part A1 and Part C5 of the UK Plan; and
 - (d) The Definition of 'Unbundled Tariff Number' in the 'Definitions and interpretation' section of the UK Plan.
8. For the purposes of the Guernsey Numbering Scheme, references to communications providers within the UK Plan should be read as references to licensees and other words or expressions in the UK Plan should be construed as relating to licensees in the Bailiwick that use numbers in the UK Plan.

C. Applications for numbers

9. Licensees can apply to Ofcom for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey by:
- (a) using Ofcom's online number management system or, if that system is unavailable, the application form made available on the Ofcom website from time to time;
 - (b) providing such information as is required by such system or application form; and
 - (c) providing to Ofcom, on request, any other information considered by Ofcom to be relevant to the application, and the supply of which does not place an undue burden on the Licensee.
10. Ofcom will determine, taking into account the provisions of the UK Plan, any application for telephone numbers by the end of the period of three weeks after the date of the receipt by it of the completed application form. Where Ofcom has required any additional information in relation to any application, Ofcom will determine the application by the end of the period of three weeks after the date of the receipt by it of that additional information.
11. Ofcom may deny an application for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey, including where:
- (a) the applicant is not a Licensee;
 - (b) the Licensee has not provided Ofcom with the information required by Ofcom under paragraph 9 above by any deadline set by Ofcom;
 - (c) Ofcom does not consider granting the allocation or reservation of telephone numbers will ensure the best and most efficient use of numbers including where:
 - (i) Ofcom is concerned that the Licensee's intended use of the telephone numbers or the arrangements or processes it has in place will not enable it to comply with this Guernsey Numbering Scheme or any restrictions or requirements Ofcom may intend to apply to the specific telephone numbers the Licensee has applied for (taking into account any evidence of existing non-compliance by the Licensee);
 - (ii) taking into account the Licensee's intended use of the telephone numbers, Ofcom does not consider it necessary for the Licensee to be allocated or reserved all or some of the telephone numbers it has applied for;

(iii) taking into account any evidence that scams or other criminal activity are taking place on telephone numbers already allocated to the Licensee, Ofcom is concerned that the arrangements or processes the Licensee has in place are insufficient to prevent scams or other criminal activity on any new telephone numbers Ofcom may allocate or reserve for the Licensee; or

(iv) the GCRA has provided information to Ofcom indicating that the application should be denied, including but not limited to that (1) the Licensee is not, or is no longer, a fit and proper person to whom numbers should be allocated or for whom numbers should be reserved; or (2) the GCRA has provided information to Ofcom indicating that the Licensee has repeatedly or seriously breached its licence conditions relating to numbering.

12. Where Ofcom denies an application for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey, it shall provide the Licensee with reasons for that denial which enable the Licensee to understand any steps it would need to take to address Ofcom's concerns.
13. Licensees can submit a new or amended application (in accordance with the process set out in paragraph 9 above) for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey at any time after they have addressed Ofcom's concerns and Ofcom shall determine that application in accordance with paragraph 10 above.
14. Where Ofcom grants an application for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey, it may also identify any restrictions or requirements applicable to the specific telephone numbers the Licensee has been allocated or reserved.
15. In accordance with the arrangements in Section F of the MoU, Ofcom will notify the GCRA of any application for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey, and any proposal to grant or deny such application. Ofcom will take due account of any information provided by the GCRA before making its decision.

D. Withdrawal of numbers

16. Ofcom may withdraw ranges of telephone numbers in the UK Plan that have been allocated to a Licensee in the circumstances identified in the MoU, including on the recommendation of the GCRA.
17. Licensees may apply to Ofcom for the withdrawal of numbers in the UK Plan allocated to them using Ofcom's online number management system or, if that system is unavailable, the application form made available on the Ofcom website from time to time.

E. Modification of this Guernsey Numbering Scheme

Ofcom may consider it necessary to modify this Guernsey Numbering Scheme from time to time after consultation with the GCRA.