



BUSINESS TELECOM LIMITED'S APPEAL CONCERNING A WHOLESALE SIP REQUEST UNDER LICENCE CONDITION 34

T1717G

DECISION (NON-CONFIDENTIAL)

Date: 05/06/2026

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1. SUMMARY

- 1.1 This decision concerns an appeal lodged by Business Telecom Limited (“**Newtel**”) regarding a request for Network Access made under Licence Condition 34.1 of Sure (Guernsey) Limited’s (“**Sure**”) fixed telecommunications licence¹ (“**Licence Condition 34**”). The Network Access sought by Newtel is for a wholesale SIP² product which would enable telephone numbers allocated to Sure to be routed to a Newtel PBX, rather than terminated on Sure’s network (“**the Request**”). Whilst not explicit in the Request, the purpose of the wholesale SIP product is to provide a portability-like outcome for customers wishing to switch their voice services from Sure to Newtel.
- 1.2 The Request was rejected by Sure on 21st July 2025 on the basis that, inter alia, it was unable to provide the requested product without breaching certain licence condition obligations. Newtel raised an appeal to the Guernsey Competition and Regulatory Authority (“**GCRA**”) on 25th July 2025 in accordance with paragraph 5.7 of the Statement of Requirements Information Notice³ (“**the Appeal**”).
- 1.3 This decision document represents a final decision within the meaning of paragraph 5.10 of the Statement of Requirements Information Notice.
- 1.4 To enable the GCRA to make an informed decision regarding the Appeal, the GCRA instructed Cenerva Limited⁴, a global consultancy which provides technical and regulatory advice on telecommunications matters, to produce an advisory report about the Request and Sure’s subsequent rejection (“**the Cenerva Report**”). The Cenerva Report was considered alongside evidence submitted by Sure, Newtel, and Based Limited (trading as “**Genesis**”).
- 1.5 Having carefully considered the evidence provided by the parties, including the Cenerva Report, the GCRA has decided to reject the Appeal. This is for the following reasons:
- 1.5.1. The Request cannot properly be characterised as a request for network access within the meaning of Licence Condition 34 and the Telecommunications (Bailiwick of Guernsey) Law, 2001 (“**Telecoms Law**”). Rather it is, in substance, an inter-operator SIP routing arrangement combined with the use of telephone numbers allocated to Sure. Accordingly, the Request cannot be appropriately dealt with under Licence Condition 34 and the Statement of Requirements process;
- 1.5.2. Notwithstanding the ineligibility of the Request under Licence Condition 34, the GCRA has not yet defined a relevant market for wholesale SIP number-hosting services or access to telephone numbers allocated Licensed Operators, nor has it determined that Sure holds a

¹ Licence (as modified) issued to Sure (Guernsey) Limited on 1st October 2016: [sure-fixed-clean-5th.pdf](#)

² Session Initiation Protocol – a communication protocol which is used to initiate, maintain, and terminate voice, video, and messaging sessions over the internet.

³ [CICRA – Statement of Requirements – Information Notice](#)

⁴ [ICT Regulatory & Policy Consulting & Training | Cenerva - Cenerva](#)

dominant position in such a market. In this instance, the prevailing SMP findings in Guernsey do not provide the level of clarity and specificity the GCRA would expect before imposing the specific product obligation sought by Newtel under Licence Condition 34 and the Statement of Requirements process;

- 1.5.3. Furthermore, and again notwithstanding the ineligibility of the Request under Licence Condition 34, the GCRA considers that the Request, if delivered, may create an inequitable outcome in the market and may complicate the introduction and implementation of fixed number portability (“FNP”), which the GCRA considers to be the appropriate long-term solution for number portability, and which is already being considered via a formal process in Guernsey. Accordingly, the GCRA would not be minded to direct Sure to facilitate for the Request under Section 10 of the Telecommunications Law, should it be requested to do so; and
 - 1.5.4. Finally, the GCRA does not consider it would be appropriate or proportionate to direct the design, development and implementation of a product which is likely required for a limited transitional period before FNP is delivered. In the GCRA’s view, FNP in Guernsey would, if delivered, likely make the Request unnecessary because FNP will be capable of providing the number portability outcomes desired by Newtel.
- 1.6 This decision does not prevent Sure and Newtel from agreeing a commercial interconnection or other commercial wholesale solution under the interconnection provisions in their respective fixed telecommunications licences. The GCRA understands that Sure has identified potential interim commercial solutions and has committed that these will remain available until FNP has been delivered. These may include a SIP novation-style arrangement under which a licensed operator assumes responsibility for a customer-specific SIP trunk and associated number block, with appropriate routing and customer relationship arrangements. While the GCRA has concerns about the extent to which such arrangements may affect the future implementation of FNP, it does not intend, through this decision, to prevent the sale of a commercially agreed wholesale product that complies with the parties’ licence obligations and applicable law.
- 1.7 Similarly, the decision does not prevent the GCRA from considering future regulatory intervention via a market review, licence modification, or direction, should that become appropriate. This includes, but is not limited to, intervention under Section 10 of the Telecoms Law.
- 1.8 The GCRA therefore considers the Appeal to be closed.

2. STRUCTURE OF THIS DOCUMENT

2.1 This document is structured as follows:

Section 3	Outlines the legal background to the Appeal.
Section 4	Sets out a high-level factual background to the Appeal.
Section 5	Sets out the GCRA's consideration of the key issues in this case.
Section 6	Sets out the GCRA's decision.

3. LEGAL BACKGROUND

- 3.1 Section 2 of the Telecoms Law permits the GCRA to grant licences authorising persons to establish, operate and maintain telecommunications networks and/or provide telecommunications services in the Bailiwick.
- 3.2 Section 5 of the Telecoms Law permits the GCRA to include such conditions in telecommunications licences as appear appropriate, having regard to the nature of the licence application, the objectives set out in section 2 of the Regulation of Utilities (Bailiwick of Guernsey) Law, 2001 (“**the Regulation Law**”), and the enforcement of the Regulation Law and the Telecoms Law. Those conditions may include, among other things, conditions relating to access to and interconnection with telecommunications networks, and conditions intended to prevent and control anti-competitive behaviour.
- 3.3 Sure holds a fixed telecommunications licence granted under the Telecoms Law. Sure's licence includes a number of conditions which apply where the GCRA has decided, in accordance with section 5 of the Telecoms Law, that Sure holds a dominant position in a relevant market and has determined that the relevant provisions of Part IV of the licence apply. Those conditions include Licence Condition 34, which concerns Network Access.
- 3.4 Where Licence Condition 34 applies, Sure is required, to the extent reasonably requested by an Other Licensed Operator, to negotiate with that operator with a view to concluding an agreement, or an amendment to an existing agreement, for Network Access. Where an Other Licensed Operator reasonably requests Network Access in writing, Sure must provide that Network Access, and must do so as soon as reasonably practicable and on fair and reasonable terms, conditions and charges. Sure must also comply with any direction the GCRA may make under Licence Condition 34.

- 3.5 A request for Network Access under Licence Condition 34 is made through the Statement of Requirements process, as set out in CICRA 19/39⁵. That process sets out the information requirements, procedural steps and timescales applicable to a request for Network Access.
- 3.6 The Statement of Requirements process also identifies the circumstances in which Sure may reject a Network Access request. These include:
- where insufficient information has been provided in the request;
 - where the requested Network Access is not technically feasible; or
 - where the requested Network Access is not commercially viable.
- 3.7 Where a Network Access request is rejected, the requesting licensed operator may appeal that decision to the GCRA under paragraph 5.7 of CICRA 19/39. The GCRA must then consider the available evidence and decide whether to uphold or reject the appeal. In considering any appeal, the GCRA must therefore consider whether Licence Condition 34 applies to the request. This includes whether the request is properly characterised as a request for Network Access, whether it relates to a market in which Sure has been determined to hold a dominant position, whether there is a sufficient legal basis for imposing the requested obligation, and whether any direction would be appropriate and proportionate in the circumstances.
- 3.8 Where the GCRA concludes that an appeal should be upheld, and that it is appropriate and proportionate to do so, the GCRA may direct Sure to provide the requested Network Access or to provide it on specified terms under Licence Condition 34.5.
- 3.9 Section 10 of the Telecoms Law permits the GCRA to give directions to Licensed Operators in relation to interconnection and access in certain circumstances. Such circumstances include where the GCRA considers a direction necessary or desirable to ensure the interoperability and protection of telecommunications networks and equipment. Section 10 additionally permits the GCRA to direct Licensed Operators with a dominant position to comply with specified interconnection and access obligations, including publication of access procedures, offering a non-discriminatory reference offer, and providing interconnection or access on transparent, cost-oriented, technically feasible and sufficiently unbundled terms.

4. FACTUAL BACKGROUND

SIP Investigation

- 4.1 In September 2024, the GCRA received two formal complaints concerning Sure's provision of fixed voice services, including SIP trunk services and the movement of DDI numbers to third-party providers. On 18 September 2024, the GCRA opened a preliminary investigation under Stage 1 of its Regulatory Enforcement Guidelines.

⁵ [CICRA – Statement of Requirements – Information Notice](#)

- 4.2 The complaints concerned whether Sure had prevented, restricted, or withdrawn arrangements which allowed customers to move their voice services to another provider while continuing to use numbers allocated to Sure. The complaints arose after Sure had, in some cases, allowed Sure-allocated numbers to be routed to another provider, enabling that provider to serve the relevant end customer.
- 4.3 During the investigation, the GCRA gathered information from Sure, Newtel and Genesis. The evidence showed that Sure had supplied retail SIP arrangements to Newtel and Genesis which had then been used in a manner that enabled calls to telephone numbers allocated to Sure to be routed towards another operator or that operator's hosted voice platform.
- 4.4 Newtel and Genesis considered that the withdrawal, or refusal to extend those arrangements, restricted their ability to compete effectively for business voice customers, particularly in circumstances where FNP was not available and Sure's ISDN services were due to be withdrawn. They also relied on the fact that similar arrangements had previously been supplied as evidence that the requested functionality was technically feasible and commercially viable.
- 4.5 Sure's position during the investigation was that its SIP service was a retail product and that it had not been required to develop or provide a wholesale SIP or wholesale ISDN product. Sure also stated that the relevant network elements used to provide retail SIP services were not productised wholesale inputs. Sure's rationale for withdrawing or ceasing to extend the SIP / DDI arrangements included the risk that those arrangements would produce anti-competitive or distortive outcomes in the absence of FNP. Sure's concern was that portability-like outcomes would be available only in one direction: customers using Sure-allocated numbers could move to Newtel or Genesis while retaining those numbers, but customers using numbers allocated to other operators would not have an equivalent ability to move to Sure or to another operator while retaining their numbers.
- 4.6 Sure also raised concerns that the arrangements could create legal, regulatory and operational risks, including issues relating to compliance with numbering obligations, lawful interception, emergency call routing, customer records, and the future implementation of FNP. In particular, Sure was concerned that customers may believe their numbers had been ported when, in fact, the number remained dependent on a bespoke routing arrangement involving Sure and the other provider.
- 4.7 The GCRA considered the evidence gathered during the 2024 investigation. On 10 April 2025, the GCRA published a Case Closing Statement. The Case Closing Statement recorded that the GCRA had concluded its investigation into Sure concerning its provision of fixed voice services, particularly its SIP trunk business service and products. The GCRA determined that there was no wrongdoing by Sure and found no evidence of regulatory breaches or misconduct.
- 4.8 The closure of that investigation did not, however, resolve the broader market issue created by the absence of FNP, namely the difficulty faced by business customers wishing to retain fixed numbers when switching between licensed operators.

Statement of Requirements, Rejection, and Appeal

- 4.9 On 7 July 2025, Newtel submitted the Request. The Request asked for what Newtel described as a “wholesale SIP arrangement”. Newtel stated that Sure had previously supplied a SIP arrangement which allowed calls to Sure’s Guernsey number ranges to be routed directly to Newtel. Newtel used that arrangement to deliver the relevant numbers to its PBX service. Newtel stated that this had been set up on three occasions and sought a similar arrangement from Sure on a wholesale basis.
- 4.10 The Request explained that Newtel had received several requests for voice services involving Guernsey number ranges and needed to be able to route inbound numbers from various locations. Newtel stated that Sure’s divert service was not scalable, was expensive and laborious, and made customers uneasy about calls being diverted via other operators and call paths.
- 4.11 The Request forecast that, over a 3–5-year period, concurrent calls would not exceed [X] channels, and that the current retail SIP arrangement for which it had been paying should be sufficient to carry the expected traffic. The Request also stated that it did not see any regulatory impacts arising from the request.
- 4.12 The GCRA understands that the arrangement requested by Newtel was intended to replicate, or regularise, the arrangement under which Newtel had previously purchased and used Sure’s retail SIP product. Newtel therefore considered that the requested product was technically feasible and commercially viable, because similar functionality had already been provided and paid for.
- 4.13 Sure rejected the SoR on 21 July 2025. Sure considered that the requested product was not a standard wholesale SIP product and that it could not be provided consistently with Sure’s existing licence obligations, particularly in relation to numbering, lawful interception and emergency call routing.
- 4.14 Sure also considered that the requested arrangement would create an inappropriate portability-like outcome in the absence of FNP. In Sure’s view, such an outcome would be available only in one direction — from Sure to Newtel — and would not be available on an equivalent reciprocal basis for customers wishing to move between other operators. Sure therefore considered that mandating or extending the arrangement could risk distorting competition and complicating the future implementation of FNP.
- 4.15 Sure’s position was that FNP is the appropriate long-term solution to the issue identified by Newtel, and that a bespoke interim wholesale SIP arrangement should not be required through the Statement of Requirements process.
- 4.16 Newtel lodged the Appeal on 25 July 2025 under paragraph 5.7 of the Statement of Requirements Information Notice. The basis of the Appeal was that “it is technically possible, as services are

already in place” and that “the best solution would be for Sure to allow the whole SIP product as it works well”. Under the Statement of Requirements process, the GCRA is required to determine whether the Appeal should be upheld or rejected and, if the Appeal is upheld, whether it is appropriate to direct Sure to take any action under Licence Condition 34.5, including requiring Sure to provide the requested Network Access or to provide it on specified terms.

Cenerva Report

- 4.17 To assist its consideration of the Appeal, the GCRA instructed Cenerva Limited (“Cenerva”) to provide independent technical and regulatory advice. Cenerva was asked to evaluate Sure’s rejection of Newtel’s SoR, explain how a typical wholesale SIP trunking product operates in a regulated market, and advise whether Sure’s stated reasons for rejecting the Request were reasonable under the SoR process. Cenerva was also asked to consider how such arguments compare with wholesale regulatory practice in other jurisdictions and whether a wholesale SIP service could be designed consistently with Sure’s licence obligations.
- 4.18 Cenerva completed its work through a review of stakeholder correspondence, structured online interviews with key stakeholders, and benchmarking research in similar markets. Cenerva engaged with the GCRA, Newtel and Genesis. Sure declined to engage directly with Cenerva and instead requested to engage with the GCRA directly. The final Cenerva Report was finalised and shared with the GCRA in March 2026.
- 4.19 The Cenerva Report concluded that Sure had erroneously permitted Newtel to purchase and resell a Sure retail SIP product which had subsequently been used by Newtel to route traffic to numbers allocated to Sure on what Cenerva described as a “pseudo wholesale” basis. The Report also noted that there appeared to be no significant technical restrictions preventing other operators from developing and deploying their own SIP access trunk services using their own numbers.
- 4.20 The Cenerva Report recommended that a wholesale SIP product of the type requested by Newtel should be considered an access product rather than an interconnection product. This was because Cenerva considered that the purpose of the Request was not to establish a SIP-based interconnection arrangement, but rather to obtain access to a Sure-provided wholesale input that would allow Sure-allocated telephone numbers to be used to create an FNP-like outcome for customers wishing to switch from Sure to Newtel.
- 4.21 The Cenerva Report also considered the permissible grounds for rejecting a request under the SoR process. Cenerva considered that, under that process, a request may be rejected on the grounds of insufficient information, technical non-feasibility, or commercial non-viability. Cenerva considered that Newtel had provided sufficient information to describe the service required, that Sure had not questioned the information provided in the SoR, that technical non-feasibility could not be relied upon because similar functionality had previously been provided to Newtel and

Genesis, and that Sure had not provided evidence that the service would be commercially non-viable.

- 4.22 The Report then considered Sure's specific reasons for rejecting Newtel's request: licence obligations and numbering, lawful interception and emergency call routing.
- 4.23 In relation to numbering and Licence Condition 18.1, Cenerva accepted that Sure's current licence wording could make it difficult for Sure to facilitate the Request. This is because Licence Condition 18.1 requires Sure to use only numbers allocated to it for the purpose of terminating messages on Sure's licensed telecommunications network. However, Cenerva noted that this condition was not aligned with Ofcom's General Conditions, which permit a communications provider to authorise another provider to adopt numbers allocated to it. Cenerva therefore recommended that the GCRA consider modifying Licence Condition 18.1 to align more closely with the Ofcom approach so that the Request could be accepted.
- 4.24 In relation to lawful interception, Cenerva considered that Sure's reliance on Licence Condition 10.2 did not, of itself, justify rejection of the Request. Cenerva's view was that interception obligations could be addressed by identifying the operator with access to the relevant data and by ensuring that responsibilities were properly allocated between the relevant licensed operators. Cenerva did not consider this to be a reason why a wholesale SIP product could not be designed consistently with licence obligations.
- 4.25 In relation to emergency call routing, Cenerva similarly considered that emergency call obligations would need to be addressed in the design of any wholesale SIP product but did not consider those obligations to provide a complete answer to the Request. Cenerva's view was that a wholesale SIP service could be designed with appropriate operational and contractual controls to allocate responsibility for emergency call routing and associated customer information.
- 4.26 Cenerva's overall recommendation was that the GCRA should consider requiring Sure to develop and implement a wholesale SIP access product. Cenerva considered that such a product could support competition and customer choice as ISDN services are retired and recommended that any withdrawal of ISDN should be aligned with the development, testing and launch of an appropriate wholesale SIP access product.
- 4.27 However, the Cenerva Report also identified concerns about the impact that any putative wholesale SIP product may have on the delivery of FNP. In particular, Cenerva noted that routing individual customer numbers from Sure to another operator through bespoke SIP forwarding or diversion arrangements could complicate the later implementation of FNP. Cenerva explained that those arrangements would need to be identified, reconciled or removed before FNP is introduced, which could make implementation more complex, time-consuming and potentially adverse to end customers.

- 4.28 The GCRA has carefully considered the Cenerva Report alongside the evidence submitted by Sure, Newtel and Genesis, the material gathered during the 2024 investigation, and the wider regulatory framework.

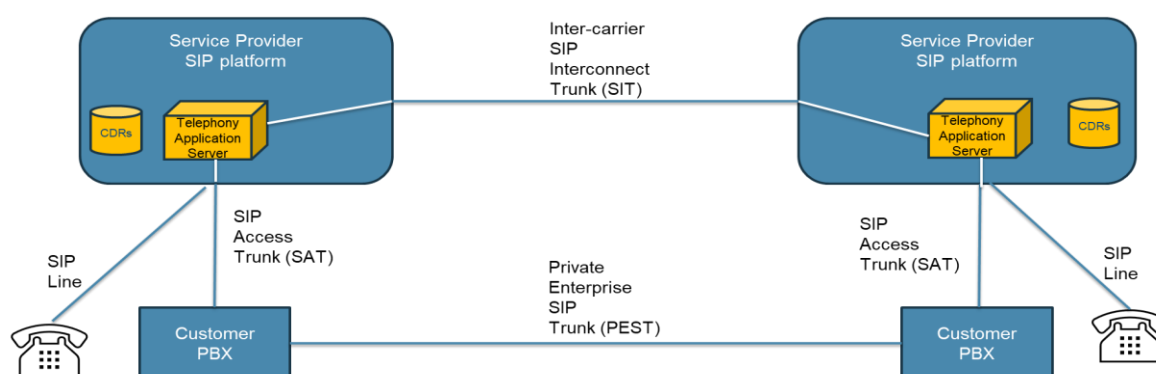
5. CONSIDERATION OF KEY ISSUES

- 5.1 The GCRA has carefully considered the Appeal by reference to the legal framework set out above, the evidence gathered during the 2024 SIP investigation, the Request and Sure's rejection of it, subsequent submissions made by Newtel, Sure and Genesis, and the Cenerva Report. The GCRA has also taken into account the wider regulatory context, including the absence of FNP in Guernsey, the planned withdrawal of ISDN services, and the work now being undertaken by the GCRA and Cenerva to assess the feasibility, and where appropriate the implementation, of FNP across the Bailiwick.
- 5.2 Although the Appeal concerns Sure's rejection of the Request, the GCRA must first consider a number of related, but distinct, preliminary issues. These are:
- 5.2.1. Whether the Request is properly characterised as a request for Network Access within the meaning of Licence Condition 34 and the Telecoms Law;
 - 5.2.2. if the Request is properly characterised as a request for Network Access, whether Sure holds a dominant position in the relevant market to which the Request relates; and
 - 5.2.3. if the Request is a request for Network Access in a market in which Sure holds a dominant position, whether it would be appropriate, proportionate and consistent with the GCRA's statutory duties to direct Sure to fulfil the Request.
- 5.3 If the Request falls within Licence Condition 34 and relates to a market in which Sure has been determined to hold a dominant position, the GCRA will consider whether Sure's rejection of the Request, including the reasons given for rejection, was appropriate in the circumstances and consistent with the Wholesale Access Statement of Requirements process. If, however, the Request falls outside Licence Condition 34, or does not relate to a market in which Sure has been determined to hold a dominant position, the GCRA cannot uphold the Appeal under that process and must reject it.
- 5.4 The GCRA considers each of these preliminary issues in turn before commenting on Sure's reasons for rejecting the Request.

Request for Network Access

- 5.5 The Request asks Sure to provide Newtel with a wholesale SIP arrangement that would allow telephone numbers allocated to Sure to be routed directly to Newtel, so that Newtel can provide voice services to customers using those numbers through its own PBX / hosted voice platform.
- 5.6 SIP, or Session Initiation Protocol, is the signalling protocol used to establish, modify and terminate real-time communications sessions over IP networks. In a voice context, SIP is used to set up and manage call signalling, while the actual voice media is typically carried using other protocols. A wholesale SIP trunk solution is a wholesale voice product comprising the technical functionality, connectivity, equipment and associated operational services required to enable another provider to deliver voice services over an IP network to its own retail or enterprise customers. SIP trunks which route services between service providers are ordinarily considered to be carrier interconnects or SIP interconnect trunks, whereas SIP trunks which connect a customer's PBX system to the public network are ordinarily considered to be SIP access trunks. This is represented topologically in Figure 1.

Figure 1: Typical Architecture of a Public IP Telephony Network⁶



- 5.7 The first issue for the GCRA is whether the Request, and specifically the wholesale SIP arrangement requested, can properly be characterised as a request for Network Access within the meaning of Licence Condition 34 and the SoR process. This is important because Licence Condition 34 only applies to requests for Network Access. If the Request is not properly characterised as Network Access, it cannot be considered under the Statement of Requirements process and the GCRA cannot direct Sure under Licence Condition 34.5 to provide the requested product.
- 5.8 Whilst Licence Condition 34 applies to requests for “Network Access”, neither that condition nor any other part of Sure’s licence defines the term. The GCRA must therefore consider the meaning of Network Access by reference to the wider statutory and licensing framework, including the definitions and concepts contained in the Telecoms Law.

⁶ Figure 1 has been produced by Cenerva and was included in the Cenerva Report.

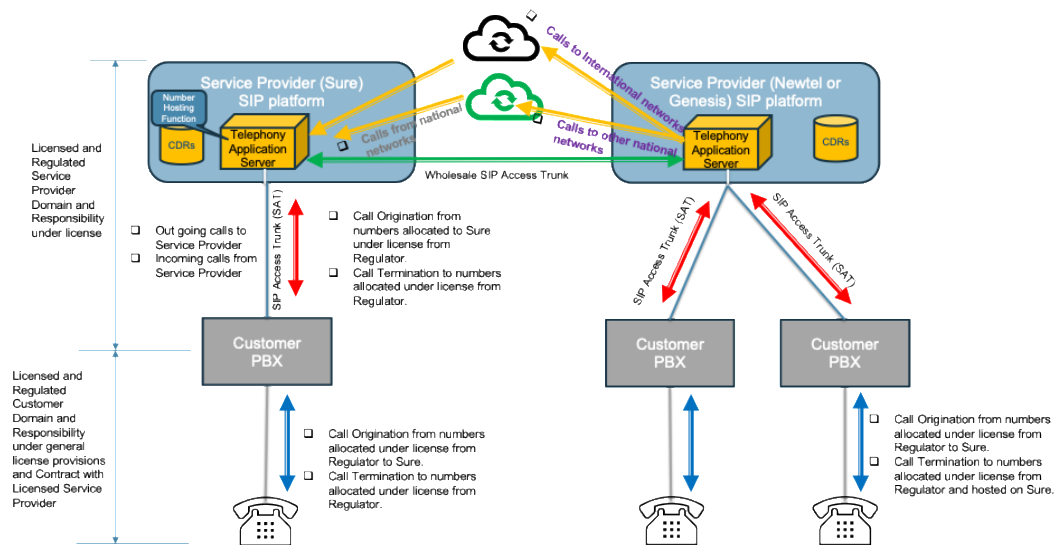
5.9 In the first instance, the GCRA has looked to the Telecoms Law to understand what is meant by “access”. This is because, where a licence term is not defined in the licence itself, the GCRA will ordinarily consider the underpinning legislation and the wider regulatory framework to understand the meaning and purpose of that term. The GCRA is not aware of any other GCRA guideline or decision which formally defines either “access” or “Network Access” for the purposes of Licence Condition 34. Under the Telecoms Law, “access” is defined as:

“such facilities and services as may be necessary to obtain or facilitate the obtaining of access to telecommunications networks, telecommunications equipment, network termination points and associated facilities for the purposes of the provision of telecommunications services.”

5.10 This is consistent with the definition of “Access” inserted by the GCRA into the licences of licensed operators in 2025. In the absence of a specific definition of “Network Access” in Sure’s licence, the GCRA considers that Network Access, in this context, refers to access by a third-party licensed operator to the network, equipment, facilities or services of an operator with a dominant position, where such access is required to enable the third-party operator to provide telecommunications services to end-users. Practical examples can be found in regulated wholesale access markets such as wholesale broadband access and wholesale leased line access, where Sure provides access to network infrastructure and associated facilities so that other licensed operators can provide services to end-users. The rationale for regulated access in those markets is that the infrastructure required to provide the relevant downstream services involves substantial sunk cost and may represent a significant barrier to entry for competing licensed operators.

5.11 The GCRA has carefully considered the technical and operational nature of the Request, including the technical explanation provided in the Cenerva Report. The Request is, in the GCRA’s view, a request for a wholesale SIP arrangement which, when associated with Sure-allocated telephone numbers, would cause inbound calls to those numbers to be routed from Sure’s network to Newtel’s network and then onward to the end-user using that telephone number. The Request is represented topologically in Figure 2.

Figure 2: The Proposed Wholesale Access SIP Solution (the Request)⁷



- 5.12 In technical terms, an inbound call to a Sure-allocated number would first be routed towards Sure because the number range is allocated to Sure. Instead of that call being terminated on Sure’s network to a Sure retail voice service, the call would be passed to Newtel over a SIP trunk or SIP-based interface. Newtel would then complete the service by routing the call through its own voice platform to the relevant end-user.
- 5.13 The GCRA does not consider that the Request fits naturally within the definition of “access” in the Telecoms Law nor the common understanding of an ‘access product’.
- 5.14 In the first instance, the Request does not seek access to Sure’s network, equipment, termination points, or associated facilities⁸ as a wholesale input enabling Newtel to provide a downstream access service. For example, under the terms of the Request, Newtel is not asking for access to Sure’s voice bearer connectivity, network termination equipment (“NTE”), session border controllers (“SBCs”), or Sure’s IMS core in order to access customer premises (and therefore customers) or replicate voice services provided by Sure. Indeed, access to Sure’s network equipment, network termination points, access bearers or associated access facilities does not appear to be necessary to facilitate any aspect of the Request.
- 5.15 Rather, the Request’s central feature is the routing of calls to Sure-allocated numbers to Newtel via a physical and/or logical connection between Sure and Newtel. The customer-facing voice service would be provided by Newtel through Newtel’s own PBX / hosted voice platform, and over a data connection which could be provided by Sure, JT, or Newtel itself. Sure’s role, and specifically the role of the requested wholesale SIP arrangement, would be to recognise inbound calls to telephone numbers associated with the requested arrangement, and route those calls across a SIP

⁷ Figure 2 has been produced by Cenerva and was included in the Cenerva Report.

⁸ Associated facilities means “means those descriptions or classes of telecommunications equipment which are designated as associated facilities by the GCRA from time to time”

trunk or SIP-based interface towards Newtel so that they can be terminated by Newtel. Such a function does not require access to Sure's network equipment, termination points, or associated facilities. This indicates that the arrangement is better understood as performing an inter-operator routing function.

5.16 Furthermore, the topology of the Request is not consistent with the common understanding of a wholesale access product. As explained in the Cenerva Report, a SIP access trunk is ordinarily used to connect a customer PBX or hosted voice platform to the public telecommunications network, whereas a carrier interconnect is used to route traffic between service providers. The Request would not simply provide Newtel with a wholesale input to connect an end-user or customer PBX to Sure's network. Rather, it would provide a facility through which traffic associated with Sure-allocated numbers would be routed from Sure's network to Newtel's network, where Newtel would then provide the customer-facing voice service. In functional terms, that topology is closer to a carrier interconnect or SIP interconnect trunk than to a SIP access trunk.

5.17 Accordingly, the GCRA has considered whether the Request more appropriately fits within the definition of "interconnection" within the Telecoms Law and Sure's licence. "Interconnection" is defined as:

"the physical and logical linking of telecommunications networks used by the same or a different organisation in order to allow the users of one organisation to communicate with the users of the same or another organisation or to access services provided by another organisation; and services may be provided by the parties involved or other parties who have access to the network"

5.18 The GCRA considers that the Request falls more naturally within this definition.

5.19 First, the Request involves the physical and/or logical linking of Sure's network and Newtel's network over which inbound call traffic to Sure-allocated numbers would be routed. This is the primary function of the requested wholesale SIP solution and constitutes a physical and logical linking of telecommunications networks used by different organisations. It therefore falls within the first part of the statutory definition of "interconnection".

5.20 Secondly, the GCRA considers that the Request would enable Newtel, and Newtel's customers, to access services currently provided over Sure's network. Sure provides fixed voice services using telephone numbers allocated to it by Ofcom and made available to customers as part of Sure's services. The purpose of the Request is to allow customers receiving services from Newtel to continue using those Sure-allocated numbers, and to allow inbound calls to those numbers to be routed through Sure and then to Newtel. In the GCRA's view, this arrangement is more properly characterised as enabling access to services provided by another organisation, rather than as access to Sure's network facilities for the purpose of replicating a downstream service.

5.21 The GCRA therefore considers that the Request is, in substance, a SIP-based interconnection or inter-operator routing arrangement.

- 5.22 The GCRA notes that the Cenerva Report concludes that the Request is “an access product, and not an interconnect product”. Cenerva reached that conclusion on the basis that Newtel was not seeking a standard carrier interconnect for the ordinary exchange of traffic between Sure and Newtel but was instead seeking a Sure-provided wholesale input that would allow Newtel to serve customers using Sure-allocated telephone numbers. The GCRA is grateful for Cenerva’s analysis and has taken it into account.
- 5.23 However, the GCRA does not agree with Cenerva’s conclusion on this point. In the GCRA’s view, the legal character of the Request must be determined by reference to the function and mechanism of the arrangement requested. As explained above, the proposed arrangement would physically and/or logically link Sure’s network and Newtel’s network for the purpose of routing inbound voice traffic associated with Sure-allocated numbers from Sure to Newtel. That is more naturally characterised as interconnection than access.
- 5.24 The GCRA accepts that the purpose of the Request is relevant. The Request is intended to allow customers to move their SIP-based voice services from Sure to Newtel while continuing to use Sure-allocated telephone numbers. However, that purpose does not alter the technical and legal nature of the product being requested. The mechanism sought is a wholesale SIP routing arrangement between two operators’ networks, together with the association of Sure-allocated numbers with that routing arrangement. The fact that the arrangement has been described as a wholesale SIP access product does not determine its legal character.
- 5.25 Accordingly, the GCRA has concluded that the Request is not properly characterised as a request for Network Access within the meaning of Licence Condition 34 and the Statement of Requirements process. Rather, the Request is, in substance, a SIP-based interconnection or inter-operator routing arrangement, combined with the use of Sure-allocated telephone numbers to create a limited portability-like outcome in the absence of FNP. As the Request falls outside the scope of Licence Condition 34, the GCRA cannot uphold the Appeal under the Statement of Requirements process and must reject it.

Sure’s Dominant Position

- 5.26 The GCRA has concluded above that the Request is not Network Access. However, for completeness, the GCRA has also considered whether, if the Request were Network Access, it would relate to a market in which Sure holds a dominant position.
- 5.27 This issue is important because Licence Condition 34 only applies where Sure holds a dominant position in the relevant market to which the requested Network Access relates. It is not sufficient that Sure has been found to hold a dominant position in some telecommunications markets. The GCRA must consider whether the product or service requested falls within a market in which Sure has been found to hold a dominant position.

5.28 Sure has been determined to hold a dominant position in a number of telecommunications markets in Guernsey. These include:

- 5.28.1. Retail Broadband Access⁹;
- 5.28.2. Wholesale Broadband Access¹⁰;
- 5.28.3. Wholesale Line Rental¹¹;
- 5.28.4. Wholesale Leased Line Access¹²;
- 5.28.5. Mobile Termination Rates¹³;
- 5.28.6. Retail Fixed Access Line Services¹⁴.

5.29 The Request does not sit neatly within any of those markets.

5.30 The GCRA has considered whether the Request could fall within the market for retail fixed access line services. It does not consider that it can. The product requested by Newtel is a wholesale arrangement, not a retail fixed access line service supplied by Sure to an end-user. In any event, fixed access line services are access services: they concern the provision of a line, connection, or service enabling an end-user to access a fixed telecommunications network. The Request performs a different function. It does not seek access to a fixed line or access connection for an end-user. Instead, it seeks a SIP-based routing arrangement between Sure and Newtel under which calls to Sure-allocated numbers would be routed from Sure's network to Newtel's network.

5.31 The GCRA has also considered whether the Request could fall within any existing wholesale access market. Again, the GCRA has concluded that it does not. The Request is not seeking access to Sure's fibre network in order to provide retail broadband, retail fixed voice, or dedicated private circuits to end-users. Those markets concern access to network inputs that enable other operators to provide downstream broadband, leased line or fixed access services over Sure's network. The Request is instead concerned with SIP routing and the continued use of telephone numbers allocated to Sure which can operate entirely separately to Sure's local fibre access network.

5.32 If the Request were to be considered within a market analysis framework, the relevant candidate market may be a market for wholesale SIP interconnection, wholesale SIP number-hosting, access to telephone numbers allocated to another operator, or some related form of number-based fixed voice routing service. However, the GCRA has not defined any such market, nor has the GCRA determined that Sure holds a dominant position in such a market.

⁹ <https://www.gcra.gg/media/2164/t1064gj-sure-guernsey-retail-price-control-final-decision.pdf> - please note, the GCRA is currently reviewing the retail broadband market in Guernsey and expects to publish a Final Decision in 2026.

¹⁰ [final-decision-wholesale-broadband-pricing-non-confidential.pdf](https://www.gcra.gg/media/2164/t1064gj-sure-guernsey-retail-price-control-final-decision.pdf)

¹¹ Ibid

¹² [t1480gj-business-connectivity-market-review-market-definition-smp-assessment-final-decision.pdf](https://www.gcra.gg/media/1480/t1480gj-business-connectivity-market-review-market-definition-smp-assessment-final-decision.pdf)

¹³ <https://www.gcra.gg/media/598255/t1394gj-mobile-termination-rates-final-decision-statutory-notice.pdf>

¹⁴ <https://www.gcra.gg/media/3665/t1009gj-wholesale-line-rental-guernsey-final-decision.pdf>

- 5.33 The GCRA has previously referred, in some contexts, to Sure's historic dominance in fixed telecommunications networks and services. However, the GCRA does not consider that it would be appropriate in this case to rely on a broad and historic dominance position to impose a new and specific product obligation under Licence Condition 34. In the GCRA's view, a direction requiring Sure to provide such a product should be based on a clearly defined relevant market and a clear finding of dominance in that market.
- 5.34 This approach is consistent with the structure of the Telecoms Law. The Telecoms Law refers to a "relevant market" as a discrete market for telecommunications services or telecommunications networks defined by the GCRA by reference to factors such as products, services, territorial extent, universal service and other relevant economic factors. That framework requires the GCRA to identify the relevant market to which any dominance-based obligation relates. It does not support the imposition of a product-specific obligation without a sufficiently clear market basis.
- 5.35 The GCRA also notes that the absence of FNP may mean that the relevant issue is not unique to Sure. In the absence of FNP, each licensed operator with telephone numbers allocated by Ofcom may have a degree of control over those numbers. Telephone numbers can become essential identifiers for business customers and may not be readily substitutable once in use due to a telephone number's uniqueness. For example, a consumer-facing business that relies on a well-established telephone number as an important customer contact point may be reluctant to switch voice service provider if doing so would require it to change that number. A change of number may make it harder for customers to contact the business, which could result in lost customers and reduced revenue.
- 5.36 The same concern could arise for a customer of any licensed operator in Guernsey where that customer relies on a well-established telephone number and cannot retain it when switching provider. This reinforces the GCRA's view that the underlying issue is more likely to be structural and market-wide, rather than unique to Sure. As a result, if the GCRA were to consider a market for access to telephone numbers or number-hosting functionality, it may be necessary to consider whether each operator with allocated number ranges holds a dominant position over those numbers.
- 5.37 The GCRA does not exclude the possibility that a future market review could define a relevant market relating to number-hosting, access to fixed numbers, wholesale SIP routing or similar services. Nor does the GCRA exclude the possibility that obligations may in future be imposed following such a review, or through licence modification, numbering directions, FNP implementation or another appropriate regulatory process. However, no such market has been defined, and no such dominance finding has been made for the purposes of this Appeal.
- 5.38 Accordingly, even if the Request were capable of being characterised as Network Access, the GCRA does not consider that the prevailing SMP findings in Guernsey provide the level of clarity and specificity the GCRA would expect before imposing the specific product obligation sought by Newtel under Licence Condition 34.

Appropriateness and Proportionality

- 5.39 The GCRA has concluded that it cannot uphold the Appeal in this instance. However, for completeness, the GCRA has also considered whether it would be appropriate and proportionate to direct Sure to fulfil the Request if the GCRA had jurisdiction to do so.
- 5.40 The GCRA does not rule out the possibility that wholesale SIP obligations, number-hosting arrangements, or related wholesale voice products may be considered in future. Such obligations may be appropriate following a market review, licence modification, numbering direction, FNP implementation process or other appropriate regulatory process. However, the question in this Appeal is narrower. It is whether, in the specific circumstances of this case, the GCRA should direct Sure to develop and provide an interim wholesale SIP arrangement that would allow Newtel to serve customers using Sure-allocated numbers before FNP has been implemented.

Asymmetric Outcomes

- 5.41 The GCRA recognises the competition and customer choice concerns raised by Newtel. In the absence of FNP, business customers that rely on established telephone numbers may be reluctant to switch voice service provider if doing so would require them to change those numbers. This may reduce the ability of alternative licensed operators to compete for those customers, particularly as ISDN services are withdrawn and customers migrate to SIP or cloud voice services.
- 5.42 However, the GCRA considers that the underlying issue is not limited to Newtel's access to a Sure-provided SIP arrangement. The underlying issue is fixed number portability. The Request seeks to create a portability-like outcome for customers wishing to move from Sure to Newtel, but it would do so through a bespoke and bilateral arrangement rather than through a formal, reciprocal and market-wide framework.
- 5.43 The GCRA considers that distinction to be important. FNP would allow customers to retain fixed numbers when switching between licensed operators on a fair, transparent and reciprocal basis. The Request would not achieve that outcome. It would allow a limited category of customers using Sure-allocated numbers to receive services from Newtel while retaining those numbers. It would not create equivalent rights or functionality for customers wishing to move from Newtel to Sure, from JT to Newtel, from Sure to JT, or between other licensed operator combinations.
- 5.44 The GCRA is concerned that directing the creation of such a product could therefore produce an asymmetric outcome. The issue of number retention is, in principle, symmetrical: each operator with numbers allocated to it may have a degree of control over those numbers in the absence of FNP. A direction imposed only on Sure would not resolve that wider issue. It could instead create

a one-sided portability-like arrangement that benefits one route of switching while leaving other switching routes unresolved.

The Risk to FNP Implementation

- 5.45 The GCRA also has concerns about the potential impact of the Request on the development and implementation of FNP. These concerns mirror the concerns raised by the Cenerva Report regarding the impact that wholesale SIP products could have on the provisioning of FNP in Guernsey.
- 5.46 On several occasions in the Cenerva Report, Cenerva states that:
- “However, we are concerned that manual migration of individual incumbent numbers to OLO wholesale SIP access products could create provisioning complexities which could impact the future delivery of the Channel Islands FNP service and this should be a consideration for the GCRA in directing Sure to offer a future wholesale SIP access product before the implementation of the Channel Islands FNP service.”*
- 5.47 The GCRA has carefully explored these concerns with Cenerva.
- 5.48 The GCRA considers FNP to be the appropriate long-term mechanism for resolving the underlying number portability issue in Guernsey. FNP is intended to provide a formal, reciprocal and market-wide process through which customers can retain fixed telephone numbers when switching between licensed operators.
- 5.49 The requested wholesale SIP arrangement would operate in a materially different way from FNP. Under a conventional FNP solution, calls to a ported number are routed using a centralised portability database or equivalent porting mechanism. That mechanism enables the relevant network to identify that a number has been ported, identify the licensed operator currently serving that number, and route the call to the correct terminating network through standard interconnection arrangements (i.e. not via the licensed operator which previously served that telephone number).
- 5.50 By contrast, under the Request, calls to Sure-allocated numbers would continue to be routed first to Sure because the relevant numbers remain within number ranges allocated to Sure. Sure would then onward route those calls to Newtel through the requested SIP arrangement. The arrangement would therefore create a portability-like outcome through donor-network forwarding or onward routing, rather than through a formal portability database recognised by all operators.
- 5.51 This creates a risk of conflict between the interim wholesale SIP arrangement and the later FNP solution. If numbers have been associated with a wholesale SIP trunk before FNP is implemented, those historic routing arrangements would need to be identified, reconciled and removed before

the affected numbers can be entered cleanly into the FNP process. Otherwise, calls may continue to follow historic onward-routing arrangements at the same time as the FNP system is intended to route calls directly to the current serving operator.

- 5.52 In practical terms, this means that the portability-like outcome created by the Request would need to be unwound before FNP can be implemented for the relevant numbers.
- 5.53 Cenerva, which is also supporting the GCRA in its feasibility assessment of FNP in Guernsey, has explained that this reconciliation would require telephone numbers or number blocks to be returned to their original donor operator's routing arrangements, or otherwise normalised within operators' systems, before they can be formally ported through the FNP database. Depending on the volume of telephone numbers or number blocks involved, and the complexity of the existing arrangements, this return and reconciliation process could be time-consuming, complex, and may create a risk of service interruption for end-users.
- 5.54 This risk is particularly acute in light of Sure's explanation of the technical and operational constraints associated with DDI ranges. Sure has explained that DDI ranges are commonly configured and routed as blocks, rather than as individual numbers. Once those configurations are in place, separating individual numbers or smaller sub-ranges from the parent block may require substantial reconfiguration via manual intervention. The creation of further bespoke routing arrangements before FNP is implemented may therefore increase the number of arrangements that need to be identified, reconciled and removed as part of any FNP migration process. This could make FNP more complex and costly to deliver at the point when the GCRA is actively considering the feasibility and benefits of introducing FNP in Guernsey.
- 5.55 The GCRA is also concerned that, if reconciliation is carried out manually, it may be more prone to error. For example, individual telephone numbers or number blocks may be missed, incorrectly recorded or incorrectly associated with a particular operator. That could result in some numbers being excluded from the initial FNP arrangements or could cause disruption to voice services during and/or after migration.
- 5.56 The GCRA considers that the Request could make the implementation of FNP more complex, more time-consuming and more prone to error. The GCRA does not consider that this means no interim commercial arrangement can be agreed between operators. However, it is a material consideration when deciding whether the GCRA should mandate the creation of a regulated wholesale SIP product before FNP is implemented.
- 5.57 In the GCRA's view, it would not be appropriate to require the creation of an interim product that may complicate the starting point for FNP, particularly where FNP is already being considered as the appropriate long-term solution to fixed number portability in Guernsey.

Sure's Reasons for Rejection

- 5.58 Notwithstanding that the GCRA has decided to reject the Appeal, the GCRA has considered Sure's stated reasons for rejecting the Request. The GCRA has done so because those reasons were considered in the Cenerva Report and because they raise wider issues relevant to the design of the Statement of Requirements process, the development of FNP, and the future regulation of numbering and wholesale voice services in Guernsey.
- 5.59 Sure's rejection of the Request was based on three principal concerns.
- 5.58.1. First, Sure considered that the Request could not be provided consistently with its current numbering obligations, in particular Licence Condition 18.1;
- 5.58.2. Secondly, Sure considered that the Request would create difficulties in relation to lawful interception and the ability of law enforcement agencies to identify the correct licensed operator; and
- 5.58.3. Thirdly, Sure considered that the Request created concerns relating to emergency call routing, particularly where calls may be routed off-island or through multiple networks before reaching the emergency call handling agent.
- 5.60 Cenerva considered each of those concerns in the Cenerva Report. In summary, Cenerva accepted that the current wording of Licence Condition 18.1 created a barrier to accepting the request because it requires Sure to only use numbers allocated to it for the purpose of terminating messages on Sure's licensed telecommunications network. However, Cenerva considered that this barrier could be straightforwardly addressed by amending the numbering conditions in telecommunications licences to align more closely with Ofcom's General Conditions, which allow a communications provider to authorise another provider to adopt numbers allocated to it. Cenerva did not consider that Sure's concerns regarding lawful interception or emergency call routing justified rejection of the Request under the Statement of Requirements process, provided that appropriate operational and contractual controls were put in place.
- 5.61 The GCRA considers that Sure's stated reasons were not, strictly, grounds for rejection under the current Statement of Requirements process. That process permits rejection where insufficient information has been provided, where the requested Network Access is not technically feasible, or where the requested Network Access is not commercially viable. Sure's reasons were not framed in those terms. They were instead concerns about compliance with licence obligations, operational accountability, and the wider legal and regulatory consequences of the Request.
- 5.62 However, the GCRA nevertheless recognises that those concerns may be legitimate matters for a licensed operator to raise when considering whether it can provide a requested product. The GCRA therefore intends to consider whether amendments should be made to the Statement of Requirements process so that it expressly permits rejection where compliance with a request would place the responding Licensed Operator in breach of its statutory or regulatory duties or

would otherwise create an unacceptable regulatory compliance risk. Such changes shall be considered by the GCRA under its ongoing Wholesale Access Framework work item.

Numbering and Licence Condition 18.1

- 5.63 The GCRA agrees with Cenerva that the current wording of Licence Condition 18.1 is capable of creating uncertainty. The GCRA is currently consulting on proposed amendments to the numbering conditions in each licensed operator's telecommunications licence. Those proposed modifications are intended to introduce a clearer and more modern numbering framework, align local numbering obligations with relevant parts of Ofcom's General Conditions and the UK National Telephone Numbering Plan, and expressly address the adoption and use of numbers allocated to another licensee. The proposed new conditions would permit a licensee to adopt numbers allocated to another licensee where authorised to do so, while preserving the obligation for the adopting licensee to comply with its own licence conditions and relevant GCRA directions.
- 5.64 The GCRA considers that those proposed numbering modifications address the concern identified by Cenerva regarding Licence Condition 18.1. However, the GCRA does not consider that the proposed modifications would, of themselves, require Sure to provide the product requested by Newtel. The proposed changes are intended to create a clearer legal framework for the adoption and use of numbers. They do not create a general obligation on one operator to make its allocated numbers available to another operator, nor do they remove the need to consider the appropriate regulatory process, relevant market position, proportionality, and the relationship with FNP.

Lawful Interception and Licence Condition 10.2

- 5.65 In relation to lawful interception, the GCRA agrees with Cenerva that the provision of the Request would not, in itself, necessarily cause Sure to breach Licence Condition 10.2. Licence Condition 10.2 places obligations on licensees in respect of the capability to intercept messages transmitted over their licensed telecommunications networks and to provide information regarding the use of licensed telecommunications services. Where Newtel provides the customer-facing voice service, Newtel would be expected to comply with the lawful interception obligations applicable to it.
- 5.66 However, the GCRA is concerned that the Request could create operational complexity for law enforcement agencies. As part of its consideration of the Appeal, the GCRA met with Guernsey Police and the Guernsey Border Agency on 26th May 2026 to understand how law enforcement agencies identify the licensed operator to which a notice under the Regulation of Investigatory Powers (Bailiwick of Guernsey) Law, 2003 ("RIPL") should be sent.

- 5.67 Guernsey Police explained that, [REDACTED]. The Request would make that assumption less reliable, because [REDACTED].
- 5.68 Guernsey Police also explained that, [REDACTED]. That creates additional legal and operational work for law enforcement agencies. [REDACTED]. Nevertheless, the GCRA considers that the Request could make it more difficult for law enforcement agencies to identify the correct operator and could increase the risk of notices being sent to the wrong party. That is an unnecessary operational and legal complexity, particularly before a formal FNP or equivalent fixed-number routing database is in place.

Emergency Call Routing and Licence Condition 14

- 5.69 The GCRA also agrees with Cenerva's assessment that Sure's concerns do not, of themselves, establish a valid ground for rejecting the Request under the current Statement of Requirements process. Cenerva's position was that emergency call routing is an important issue that would need to be addressed in the design of any wholesale SIP arrangement, but that it does not necessarily prevent such a product from being designed consistently with licence obligations.
- 5.70 Whilst the GCRA also agrees with Sure that as a matter of operational best practice, emergency calls should take the shortest and most resilient route to the relevant emergency call handling agent, this is not currently expressed as a specific regulatory requirement in Guernsey. Similarly, the possibility of more complex emergency call routing does not amount to a technical or commercial barrier to Sure delivering the requested product for the purposes of the Statement of Requirements process.
- 5.71 In the context of providing SIP-based voice services to end-users, the GCRA considers that responsibility for emergency call handling rests with the licensed operator providing services to the end-user. Where a licensed operator routes emergency call traffic in a way that is inconsistent with its licence obligations, or where end-users do not have uninterrupted access to emergency services, the GCRA will consider taking appropriate enforcement action against that licensee under the relevant licence conditions and the Telecoms Law.
- 5.72 Accordingly, while the GCRA accepts aspects of Sure's concerns regarding numbering, lawful interception and emergency call routing, those concerns do not, in and of themselves, represent legitimate reasons for rejection under the current Statement of Requirements process. That process identifies specific grounds for rejection, namely insufficient information, technical non-feasibility, or commercial non-viability. Sure's concerns are better understood as wider regulatory and operational considerations relevant to the design of any future process and to the GCRA's assessment of appropriateness and proportionality.
- 5.73 In any event, these considerations do not alter the GCRA's conclusions in this Decision. The GCRA has concluded that the Request is not properly characterised as Network Access, that the prevailing SMP findings do not provide the level of clarity and specificity the GCRA would expect

before imposing the requested product obligation, and that a direction would not be appropriate or proportionate in the circumstances.

6. DECISION

- 6.1. For the reasons set out in Section 5 of this Decision, the GCRA rejects the Appeal under paragraph 5.8 of the Statement of Requirements process.
- 6.2. The GCRA has concluded that the Request cannot be properly characterised as a request for Network Access within the meaning of Licence Condition 34 and the Statement of Requirements process. The GCRA has also concluded that, in this instance, the prevailing SMP findings in Guernsey do not provide the level of clarity and specificity the GCRA would expect before imposing the specific product obligation sought by Newtel. In any event, the GCRA does not consider that it would be appropriate or proportionate to direct Sure to develop and provide the requested wholesale SIP arrangement in the circumstances of this case, particularly in light of the GCRA's ongoing consideration of FNP in the Bailiwick.
- 6.3. The GCRA considers the Appeal to be closed.
- 6.4. The closure of the Appeal does not prevent Sure, Newtel, or any other Licensed Operator from seeking to agree commercial transitional arrangements. The GCRA understands that Sure has identified potential interim commercial options, including a "walled-garden" or SIP novation-style arrangement under which a licensed operator could manage a customer's retail SIP trunk and use carrier pre-select to route calls via that operator's network. Sure has indicated that this type of arrangement could be made available to other licensed operators on a commercial basis. Any such arrangement would need to be negotiated between the relevant parties and comply with applicable licence conditions and legal obligations.
- 6.5. The GCRA is also aware that Sure has stated its intention to extend System X support until mid-2027, thereby delaying the withdrawal of ISDN products. The GCRA considers that this should reduce the risk of unnecessary customer disruption while the feasibility and potential implementation of FNP is being considered.
- 6.6. Sure has provided assurances that its ISDN2 emulation product will be made available from Q3 or Q4 2026 as a technology-led replacement for customers currently using ISDN2 services. Sure has also committed that customers will not be required to enter into a new minimum term or extend their existing contractual term when adopting the ISDN2 emulation product. The GCRA therefore understands that affected customers who are already outside their minimum contractual terms will remain free to leave Sure after migrating to the ISDN2 emulation product. Accordingly, once FNP becomes available, those customers should be able to move their number or numbers to another provider through the FNP process.

6.7. The GCRA considers that these transitional commercial arrangements provide an appropriate interim position while the GCRA continues its work to assess and, where appropriate, implement FNP as the long-term solution to the need for portability in Guernsey.