



Draft Decision – Retail Price Control Start Date (CICRA 16/35)

Sure (Guernsey) Limited wishes to object to the wording used by the Guernsey Competition & Regulatory Authority (GCRA) in its Draft Decision (CICRA 16/35) on Sure's Price Control. It is proposed that 'the determination set out in CICRA 16/09 will take effect on 1 January 2017 and will remain in place until replaced or removed following a review'.

Whilst both documents (16/09 & 16/35) make reference to a three year period, to avoid future ambiguity around the exact end date we would urge the GCRA to change the Final Decision in relation to CICRA 16/35 to match the wording used by the Jersey Competition & Regulatory Authority (JCRA) in its Final Decision in relation to JT's Price Control. This states that 'the decision will take effect on 1 January 2017 will [sic] remain in place **for the three year period** [emphasis added] unless replaced or removed following a review'.

Considering that CICRA was established to, amongst other things, apply consistent regulatory frameworks across the Channel Islands, we are concerned that, in this instance, inconsistent approaches have been proposed between the two jurisdictions. We first highlighted this to the CICRA on 13 April 2016, but it appears that no acknowledgement has so far been taken of our concerns.

Sure (Guernsey) Limited
9 September 2016