



**Response by Sure (Isle of Man) Limited to the Communications Commission's Annual Review and Draft Decision Notice on Mobile Termination Rates**

Sure (Isle of Man) Limited ("Sure") is providing these comments in response to the above document, which was issued by the Communications Commission ("the Commission") on the 21<sup>st</sup> February 2017.

We are submitting this response on a non-confidential basis and are therefore happy for the Commission to share it with other interested parties and to publish it on the Commission's website.

Sure notes that the Commission believes that the current MTR of 1.25ppm should remain in place for a further year, with effect from 1<sup>st</sup> May 2017.

Sure supports the Commission's view and appreciates that the Commission recognises the significant investments already made by Sure - and MT - in 4G networks, and the need for continued investment. We also agree that a requirement to undertake LRIC cost modelling would place a disproportionate burden on the two mobile operators, and indeed on the Commission.

Therefore, we have no objections to the Commission's proposal to maintain the existing MTR at its current rate of 1.25ppm with effect from 1<sup>st</sup> May 2017, and we are supportive of the draft decision as set out in Annex A of the Commission's document.

Sure (Isle of Man) Limited  
20th March 2017