GIBRALTAR REGULATORY AUTHORITY

DESIGNATION OF UNIVERSAL SERVICE PROVIDER

Public Consultation

20th March 2026

C01/26

FOREWORD

Universal services aim to ensure that basic electronic communications services which are essential to social and economic inclusion are available to end users upon reasonable request and at an affordable price.

In 2024, the Authority carried out a public consultation to examine potential changes that could impact the universal service obligations and designated provider/s.

Public Consultation C03/24 was issued on 3rd October 2024, followed by Decision C01/25 on 12th February 2025, which designated Gibtelecom as Universal Service Provider for a period of one year.

Accordingly, the Authority must revisit the current universal service designation and proceed with a new public consultation.

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1. INTRODUCTION

The Gibraltar Regulatory Authority (the "Authority") is responsible for the regulation of the electronic communications sector in Gibraltar in accordance with Gibraltar law. One of the Authority's functions is to determine what undertaking(s) should be designated as Universal Service Provider ("USP") in the electronic communications market.

In accordance with the Communications (Universal Service and Users' Rights) Regulations 2006 (the "Universal Service Regulations"), a series of measures were set out to ensure the provision of universal services in Gibraltar. Under the Universal Service Regulations, the Authority is responsible for the designation of one or more persons, for such a period as may be specified by the Authority, to comply with universal service obligations ("USO").

The Authority conducted a public consultation in 2024 to assess any potential changes in the market which could impact the provision of universal service. Public Consultation C03/24 was published on 3rd October 2024 and after considering feedback from interested parties, Decision Notice C01/25 was issued on 12th February 2025, designating Gibtelecom as the USP for a period of one year. Accordingly, the Authority must revisit the current universal service designation and proceed with a new public consultation.

To this end, the Authority invites all interested parties to provide comments on the questions set out in this public consultation *(full list of questions are set out in Annex A).*

Written comments will be accepted no later than 17th April 2026.

In order to promote further openness and transparency, the Authority will publish the names of all respondents and their responses on its website and will also make available for inspection responses to the consultation at its offices. Please note that this is subject to confidentiality. Respondents are asked to clearly identify material which is to be treated as confidential or commercially sensitive.

2. NATURE OF UNIVERSAL SERVICE OBLIGATION

2.1 BACKGROUND

Universal Service aims to ensure that basic electronic communications services which are essential to social and economic inclusion are available to end users on reasonable request and at an affordable price. The obligations are focused on bringing benefits to those with low incomes who have difficulty in affording a telephone service, end users with disabilities and other vulnerable members of the public.

The USOs considered in this public consultation are:

- Provision of access at a fixed location and provision of telephone services;
- Directory enquiry services and directories;
- Public pay telephones and other public voice telephony access points;
- Measures for disabled users; and
- Affordability of tariffs for universal services.

In designating the above, the Authority will consider factors such as market share, size of the network, experience and ability to provide universal services. Once this process is complete and all responses to this consultation have been considered, the Authority will formally designate one or more undertakings as the USP with specified obligations.

2.2 DESIGNATION OF UNIVERSAL SERVICE PROVIDER

One of the Authority's functions is to determine which undertaking(s) should be designated as USP in the electronic communications market. Different undertakings can be designated to provide different aspects of universal service.

Designated USPs are assigned obligations of directory enquiry services and directories, provision of access at a fixed location and provision of telephone services, public pay telephones and other public voice telephony access points, measures for disabled end-users and affordability of tariffs for universal services.

In accordance with regulation 7(3) of the Universal Service Regulations, the Authority shall issue a Notice[1] under section 12 of the Communications Act 2006 (the "Act") to implement a procedure for the purpose of designating a USP, which is efficient, objective and transparent and does not involve any undue discrimination against any provider(s). In

[1] Universal Service Procedure, Notice C03/21, Gibraltar Regulatory Authority, 26/07/21

conducting such reviews, the Authority considers the public consultation procedure set out in section 13 of the Act and regulation 28 of the Universal Service Regulations.

2.3 UK/EU AGREEMENT IN RESPECT OF GIBRALTAR

The Authority is mindful of the draft United Kingdom/European Union Agreement in respect of Gibraltar. While the precise legal and regulatory implications of this framework remain subject to final ratification and implementation arrangements, it is anticipated that the evolving relationship between Gibraltar and the European Union may influence the broader economic and regulatory environment in which the electronic communications sector operates.

In particular, the implementation of the Agreement may facilitate increased regulatory cooperation and market integration with neighbouring jurisdictions. As with any significant political or legislative development, a period of adjustment may be expected while the practical implications become clearer for regulators, operators and end-users.

In this context, the Authority considers it appropriate that the regulatory framework governing essential communications services remains stable and predictable. USOs ensure that basic electronic communications services essential to social and economic inclusion are available to all end-users upon reasonable request and at an affordable price, including those who may be vulnerable or socially disadvantaged, and end-users in areas where market forces alone may not guarantee service provision.

Maintaining continuity in the designation of a USP therefore supports reliable delivery of these essential services during any period of broader policy evolution.

2.4 DESIGNATION PERIOD

In 2024, a designation period of one year was considered appropriate for the provision of all elements of universal service. This approach reflected the Authority's intention at the time to maintain flexibility in a period where the local telecommunications market was experiencing changes in market dynamics, including shifts in market share and evolving service provision. A shorter designation period therefore allowed the Authority to monitor developments more closely and make timely adjustments to the scope or provision of universal service where necessary.

However, the Authority now considers that a longer designation period may be more appropriate. Developments in the draft United Kingdom/European Union Agreement in respect of Gibraltar further highlight the importance of maintaining regulatory certainty within key economic sectors. While the precise implications of any future arrangements will become clearer over time, the Authority considers it prudent to ensure that essential communications services continue to be provided within a stable and predictable regulatory framework during this period. Against this backdrop, the Authority considers that increasing the designation period for all elements of universal service would provide greater stability and predictability for both consumers and market participants.

The Authority therefore proposes to increase the designation period for all elements of universal service to three years.

This option would provide greater stability than the current one-year designation, while still allowing the Authority to review the arrangements within a reasonable timeframe should market conditions or regulatory considerations change.

The Universal Service Regulations do not specify the designation period, instead regulation 7(1) of these regulations require the Authority to designate a person(s) for such a period as may be specified by the Authority. To this end, the Authority reserves the right to review designation periods, as appropriate, even prior to the set date in accordance with its regulatory powers and responsibilities.

Consultation Question

Q1. Do you agree that the designation period for the provision of universal service should be increased to three years? What would you consider to be the most appropriate designation period, and why?

3. UNIVERSAL SERVICE OBLIGATIONS

3.1 PROVISION OF ACCESS AT A FIXED LOCATION AND PROVISION OF TELEPHONE SERVICES

The Universal Service Regulations provide that "*a designated Universal Service provider shall satisfy all reasonable requests for connection at a fixed location to a public electronic communications network*" [2]. Gibtelecom, as the current USP, is required to satisfy any reasonable request to provide a connection to the public telephone network at any fixed location in Gibraltar.

The connection provided by Gibtelecom, shall, taking into account prevailing technologies used by the majority of subscribers and to technological feasibility, be capable of supporting voice communications, broadband internet access services, facsimile communications and data communications at data rates that are sufficient to permit functional internet access.

The broadband internet access service must be capable of delivering bandwidth which, as a minimum, can support the provision of email, search engines enabling search and finding of all type of information, basic training and education online tools, online newspapers or news, buying or ordering goods or services online, job searching and job searching tools, professional networking, internet banking, eGovernment service use, social media and instant messaging, as well as calls and video calls (standard quality).

[2] See regulation 3(1) of Communications (Universal Services and Users' Rights) Regulations 2006

In accordance with regulation 3(5) of the Universal Service Regulations, the Authority may stipulate certain requirements to be complied with by a designated USP in relation to functional internet access, the terms and conditions upon which the connection shall be provided, the reasonableness of requests for the connection and the handling of calls to the emergency services.

3.2 DIRECTORY ENQUIRY SERVICES AND DIRECTORIES

The Universal Service Regulations provide that a comprehensive directory is made available to all end-users in a form approved by the Authority, whether printed or electronic, or both, and is updated at least once a year, and a comprehensive telephone directory enquiry service is made available to all end-users, including users of public pay telephones.

The designated USP shall also:

- keep a record of all subscribers of publicly available telephone services in Gibraltar, including those with fixed, mobile and personal numbers, who have not refused to be included in that record;

- allow access to any information contained in such a record in accordance with such terms and conditions as may be approved by the Authority or as the Authority may direct; and

- apply the principle of non-discrimination to the treatment and presentation of information that has been provided to him or has in his possession or under his control.

3.3 PUBLIC PAY TELEPHONES AND OTHER PUBLIC VOICE TELEPHONY ACCESS POINTS

A designated USP shall ensure that public pay telephones and other public voice telephony access points are provided to meet the reasonable needs of end-users in terms of –

- geographical coverage;

- number of such telephones or other public voice telephony access points;

- accessibility of such telephones and other access public voice telephony points to disabled end-users; and

- quality of services.

The operator providing public pay telephones must also ensure that it is possible to make emergency calls free of charge.

It is essential to highlight that operators of public pay telephones must provide directory enquiry access for their users.

3.4 MEASURES FOR DISABLED END-USERS

A USP shall be required to provide specific measures for disabled end-users in order to guarantee access to and affordability of publicly available telephone services, including access to emergency services, directory enquiry services and directories which are equivalent to that enjoyed by other end-users.

Under this obligation, the Authority may specify the terms and conditions to be complied with by a designated USP for the purpose of ensuring that disabled end-users can benefit from the choice of service providers available to the majority of end-users in Gibraltar.

3.5 AFFORDABILITY OF TARIFFS FOR UNIVERSAL SERVICES

In accordance with the Universal Service Regulations, the Authority may require a designated USP to establish schemes for one or more of the following purposes –

- the provision of special tariff options or packages to consumers, in particular for the purpose of ensuring that consumers on low incomes or with special social needs are not prevented from accessing universal services;

- the application of a common tariff, or common tariffs, for the provision of the universal services; and

- compliance with price caps for the provision of the universal services.

The conditions of a scheme shall be fully transparent, applied in accordance with the principle of non-discrimination and published. Furthermore, the Authority may require that a scheme be modified or withdrawn.

4. MARKET ANALYSIS

For the purpose of this review, the Authority has considered the latest available 2025 statistical data concerning Gibraltar's broadband market, together with the published market data and analysis as presented in Public Consultation C03/24 - Designation of Universal Service Provider.[3] To date, the Authority conducts such consultations annually, and the dataset referenced in the consultation provides a comprehensive overview of broadband subscriber numbers, retail market trends and the relative standing of operators within the market.

To this end, the Authority has not observed any material changes in market structure or market shares since the publication of that consultation which would warrant a significantly different assessment at this stage. Furthermore, the availability of services remains broadly consistent with the findings of the previous review. The Authority therefore considers that the conclusions drawn from the most recent market data continue to be relevant and appropriate for assessing the current universal service designation.

Notwithstanding the distribution of retail market shares, the Authority believes that market share alone should not be determinative when assessing the most appropriate undertaking to fulfil the USO. In particular, the Authority must also consider factors such as network reach and the ability to guarantee service provision across all areas of Gibraltar. In this regard, Gibtelecom continues to operate the most extensive and long established fixed telecommunications infrastructure in Gibraltar, enabling it to deliver services throughout the entire territory. This network ubiquity remains a key consideration in determining which undertaking is best placed to ensure that all reasonable requests for access at a fixed location can be met.

Furthermore, the Authority notes that the development of competing fibre networks has resulted in a highly competitive retail market, with consumers now able to choose from a wide range of broadband and bundled communications services offered at varying price points. As a result, USOs increasingly operate as a regulatory safety net, rather than serving as the primary mechanism through which most consumers access communications services. In practice, the majority of end-users obtain services through the competitive market, selecting packages that best meet their requirements in terms of price, speed and bundled services.

In light of these developments, the Authority considers that the primary purpose of universal service in the current market context is to ensure that no end-user is left without access to essential communications services in situations where market forces alone may not provide a connection. Maintaining a clearly designated USP therefore ensures that such requests can continue to be met in a reliable and predictable manner, while allowing the competitive market to remain the principal driver of service provision for the majority of consumers.

As stated above, the Authority remains mindful of the broader policy environment in which Gibraltar's telecommunications sector operates, as well as recent developments related to a UK-EU Agreement. In this regard, the Authority considers maintaining continuity in the

[3] Public Consultation C03/24 – Designation of Universal Service Provider, Gibraltar Regulatory Authority, 3 October 2024.

designation of the undertaking responsible for universal service provision supports regulatory stability.

Given Gibtelecom's established role as the designated USP over successive designation periods, together with its ownership of the most extensive fixed telecommunications infrastructure in Gibraltar, maintaining this designation supports the continued reliable delivery of USOs as the broader regulatory environment evolves.

For these reasons, the Authority's preliminary view is that Gibtelecom should continue to be designated as the USP in respect of the relevant universal service obligations set out below.

5. INDIVIDUAL DESIGNATIONS

5.1 PROVISION OF ACCESS AT A FIXED LOCATION AND PROVISION OF TELEPHONE SERVICES

A fundamental requirement of universal service is that all reasonable requests for connection at a fixed location to a public electronic communications network are satisfied.

Gibtelecom, by virtue of its ownership and operation of the most extensive fixed telecommunications network in Gibraltar, is well placed to meet such requests across the entirety of the territory. Its network infrastructure provides near-ubiquitous coverage and has historically enabled the company to deliver fixed telephony and broadband services to residential and business customers throughout Gibraltar.

The Authority notes that alternative operators have expanded their fibre broadband networks in recent years and now provide a range of competitive broadband services. However, despite these developments, Gibtelecom remains the only operator with infrastructure capable of ensuring universal geographic reach and guaranteed service provision in all locations where a request for service may arise.

Taking these factors into account, and in the absence of any significant market developments since the Authority's most recent review, the Authority is of the preliminary view that the continued designation of Gibtelecom as USP in this regard remains the most proportionate and effective approach to safeguarding universal service provision in Gibraltar.

FUNCTIONAL INTERNET ACCESS

The Authority remains of the view that a minimum broadband data speed of 20Mbps continues to be sufficient to support functional internet access for the purposes of universal service in Gibraltar. This threshold enables end-users to perform a wide range of everyday online activities including web browsing, email communication, access to eGovernment

services, online banking, educational resources, social media platforms and standard-definition video streaming.

Furthermore, the Authority notes that Gibraltar benefits from a high level of fibre network coverage and a competitive retail market, with operators offering a wide range of broadband packages that significantly exceed this minimum threshold. In practice, most consumers subscribe to higher-speed packages based on their individual requirements and budget.

As such, the universal service requirement should be viewed primarily as a baseline safety net, ensuring that a reliable and functional level of connectivity remains available to all end-users, rather than reflecting the speeds typically purchased in the commercial market. Maintaining the 20Mbps threshold therefore strikes an appropriate balance between ensuring adequate functional connectivity while avoiding the imposition of disproportionate regulatory obligations on the designated USP.

Given the above, the Authority is of the view that the minimum broadband data rate should remain at 20Mbps.

Consultation Questions

Q2. Do you agree with the Authority's proposal that Gibtelecom should continue to be designated as the Universal Service Provider with respect to the provision of access at a fixed location and provision of telephone services?

Q3. Do you agree with the proposal that the minimum broadband speed for functional internet access should remain at 20Mbps? If not, please give reasons for your answer.

5.2 DIRECTORY ENQUIRY SERVICES AND DIRECTORIES

Directory enquiry services and directories, have long played a crucial role in ensuring easy access to contact information for individuals and businesses alike.

To date, Gibtelecom, as the designated undertaking, has been providing this USO i.e. a telephone directory and a comprehensive directory enquiry service. Furthermore, Gibtelecom has developed a vast level of experience in the provision of directories and directory enquiry services and has demonstrated consistent performance in fulfilling the USO effectively to date. It is also vital to ensure that directory enquiry services remain relevant, accessible, and fairly supported by all telecommunications operators in Gibraltar.

Gibtelecom already maintains extensive subscriber records and supporting systems that enable the effective delivery of these services. Maintaining this arrangement would therefore ensure continuity while preventing unnecessary duplication of infrastructure and administrative processes.

Therefore, the Authority is of the preliminary view that Gibtelecom should continue to be designated as USP in respect of the provision of directory enquiry services and directories.

Consultation Questions

Q4. Do you agree with the Authority's proposal that Gibtelecom should continue to be designated as the Universal Service Provider with respect to the provision of directory enquiry services and directories?

5.3 PUBLIC PAY TELEPHONES AND OTHER PUBLIC VOICE TELEPHONY ACCESS POINTS

The ubiquity of Gibtelecom's network is relevant in the context of the provision of public pay telephones. Furthermore, given Gibtelecom's existing infrastructure and established network of phone boxes throughout Gibraltar as well as their experience make them the most practical choice to continue this service, ensuring that public payphones remain available for those who still rely on them. Gibtelecom already has a number of public pay telephones situated in key locations around Gibraltar despite a drastic decrease in their use and associated revenue.

The Authority also remains conscious of the fact that, requiring alternative operators to invest in building a similar infrastructure would be extremely burdensome, particularly in the context of declining payphone usage due to the widespread adoption of mobile phones and other communication technologies.

Furthermore, the Authority recently conducted a Public Consultation[4] to review the existing obligations placed on Gibtelecom regarding the provision of public payphones, and on 12th March 2024, the Authority published its Decision Notice.[5]

Consequently, the Authority is of the preliminary view that Gibtelecom should be designated as USP with respect to the provision of public pay telephones and other public voice telephony access points in Gibraltar.

Consultation Question

Q5. Do you agree with the Authority's proposal that Gibtelecom should continue to be designated as the Universal Service Provider with respect to the provision of public pay telephones and other public voice telephony access points in Gibraltar?

[4] Provision of Public Pay Telephones and other Public Voice Telephony Access Points, Public Consultation C01/23, Gibraltar Regulatory Authority, 13/11/23

[5] Provision of Public Pay Telephones and other Public Voice Telephony Access Points, Decision Notice C01/24, Gibraltar Regulatory Authority, 12/03/24

5.4 SPECIFIC MEASURES FOR DISABLED END-USERS

The Universal Service Regulations provide for specific measures for users with disabilities. Thus, the Authority has the capability to specify obligations pertinent to designated undertakings for the purpose of ensuring that disabled end-users can take advantage of the choice of service providers available to the majority of end-users in Gibraltar.

The Authority notes that in its Decision Notice C01/25 – Designation of Universal Service Provider[6], the USO relating to the provision of specific measures for disabled end-users was removed from Gibtelecom.

The Authority remains mindful that requiring operators to procure and maintain specialised customer premises equipment may impose disproportionate costs, particularly where demand for such equipment remains limited. Furthermore, the Authority notes that it has not received any complaints or persistent issues regarding the provision of services for disabled end-users since the removal of this obligation.

To this end, the rights of end-users with disabilities are still protected, as Condition 11 of Notice No. C02/24[7] continues to remain in force and mandates that all operators provide certain measures for disabled end-users, ensuring continued support across the sector. By relying on the requirements of Condition 11, the Authority can leverage the collective resources of Gibtelecom, GibFibre and u-mee to provide comprehensive coverage and maintain high-quality service standards throughout Gibraltar in respect of the provision of specific measures for disabled users.

In the absence of this USO, the Authority strongly encourages all operators to proactively monitor the market and consider the needs of disabled or vulnerable end-users. By adopting a proactive stance, operators can ensure inclusivity and accessibility for all, thereby fostering a more equitable digital environment. Furthermore, this approach not only meets regulatory expectations but also demonstrates a commitment by operators to fulfilling their social responsibility and ensuring that that needs of disabled end-users are met.

Consultation Question

Q6. Do you agree with the Authority's proposal that no single operator should be designated as Universal Service Provider with respect to the provision of specific measures for disabled end-users?

5.5 AFFORDABILITY OF TARIFFS FOR UNIVERSAL SERVICES

The Authority may require a designated USP to have schemes in place for the provision of special tariff options or packages to consumers, in particular to ensure that consumers on low income or with special social needs are not prevented from accessing the electronic communications network or services. The scheme(s) established must be fully transparent, published and applied in accordance with the principle of non-discrimination.

[6] Designation of Universal Service Provider, Decision Notice C01/25, Gibraltar Regulatory Authority, 12/02/2025

[7] Conditions attached to a General Authorisation and to rights of use for numbering resources, Notice No. C02/24, Gibraltar Regulatory Authority, 11/03/24

The USO with respect to the affordability of tariffs for universal services is inherently linked to Gibtelecom's current designation as USP with respect to the provision of access at a fixed location and the provision of telephone services. This interdependence arises because universal service ensures that essential telecommunications services are available to all consumers, including those in underserved areas, at an affordable price. For the affordability obligation to be effectively implemented, there must be a designated provider (currently Gibtelecom) responsible for delivering these services to all fixed locations. It is the Authority's view that, without this designation, the affordability aspect of universal services cannot be guaranteed.

The Authority also notes that it has not received any complaints from vulnerable users or individuals on low incomes indicating that they are unable to afford broadband or telephony services. This may in part reflect the competitive nature of Gibraltar's telecommunications market, where consumers can choose from a wide range of competitively priced packages, including offers specifically targeted at pensioners. Therefore, the imposition of further "affordability" obligations on alternative operators cannot be reasonably justified.

Having said this, the Authority encourages all operators to continue monitoring the market and to consider offering specialised packages for users with low incomes or special social needs where appropriate.

It is the Authority's view is that Gibtelecom should continue to be designated as USP with respect to the affordability of tariffs for universal services.

The Authority reserves the right to consult on this matter at any time and designate a given undertaking(s) with respect to affordability of tariffs for universal services, thereby requiring an operator to have schemes in place for the provision of special tariff options or packages for users with low income or special social needs should this be required.

Consultation Question

Q7. Do you agree with the Authority's proposal that Gibtelecom should continue to be designated as the Universal Service Provider with respect to the affordability of tariffs for universal services?

ANNEX A: CONSULTATION QUESTIONS

Q1. Do you agree that the designation period for the provision of Universal Services should be increased to three years? What would you consider to be the most appropriate designation period, and why?

Q2. Do you agree with the Authority's proposal that Gibtelecom should continue to be designated as the Universal Service Provider with respect to the provision of access at a fixed location and provision of telephone services?

Q3. Do you agree with the proposal that the minimum broadband speed for functional internet access should remain at 20Mbps? If not, please give reasons for your answer?

Q4. Do you agree with the Authority's proposal that Gibtelecom should continue to be designated as the Universal Service Provider with respect to the provision of directory enquiry services and directories?

Q5. Do you agree with the Authority's proposal that Gibtelecom should continue to be designated as the Universal Service Provider with respect to the provision of public pay telephones and other public voice telephony access points in Gibraltar?

Q6. Do you agree with the Authority's proposal that no single operator should be designated as Universal Service Provider with respect to the provision of specific measures for disabled end-users?

Q7. Do you agree with the Authority's proposal that Gibtelecom should continue to be designated as the Universal Service Provider with respect to the affordability of tariffs for universal services?

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