

CONSUMER SAFEGUARDS POLICY AND REGULATORY FRAMEWORK

QUALITY OF SERVICE REPORT FOR Q3, 2025

OVERVIEW

1. On 17 December 2020, following a period of public consultation, the Communications Regulator (“the Regulator”) issued a [Direction to Sure South Atlantic Limited \(“Sure”\) establishing Quality of Service Standards for Public Electronic Communication Networks and Services](#) in the Falkland Islands (“the Direction”). The Direction requires Sure to submit quarterly figures regarding complaints, faults, network outages and service reliability. The Direction also established targets for each of 15 separate quality of service measures (as shown in Schedule 1).
2. On 9 April 2021, the Regulator issued a [Policy for Assessing and Awarding Penalties Following Missed Quality of Service Performance Targets](#) (“the Policy”). The Policy determines how the Regulator should respond in the event that Sure does not meet the targets specified in the Direction of 17 December 2020. Amongst other considerations, penalties will not normally follow before a target has been missed to a material extent on two or more consecutive quarters or on average over the calendar year or in three or more of the preceding four quarters.
3. This report presents and analyses the data submitted by Sure regarding complaints, faults, network outages and service reliability during Q3 of 2025 (July to September inclusive).
4. Please note some graphics used in the report were created with the assistance of AI technology.

FAULTS

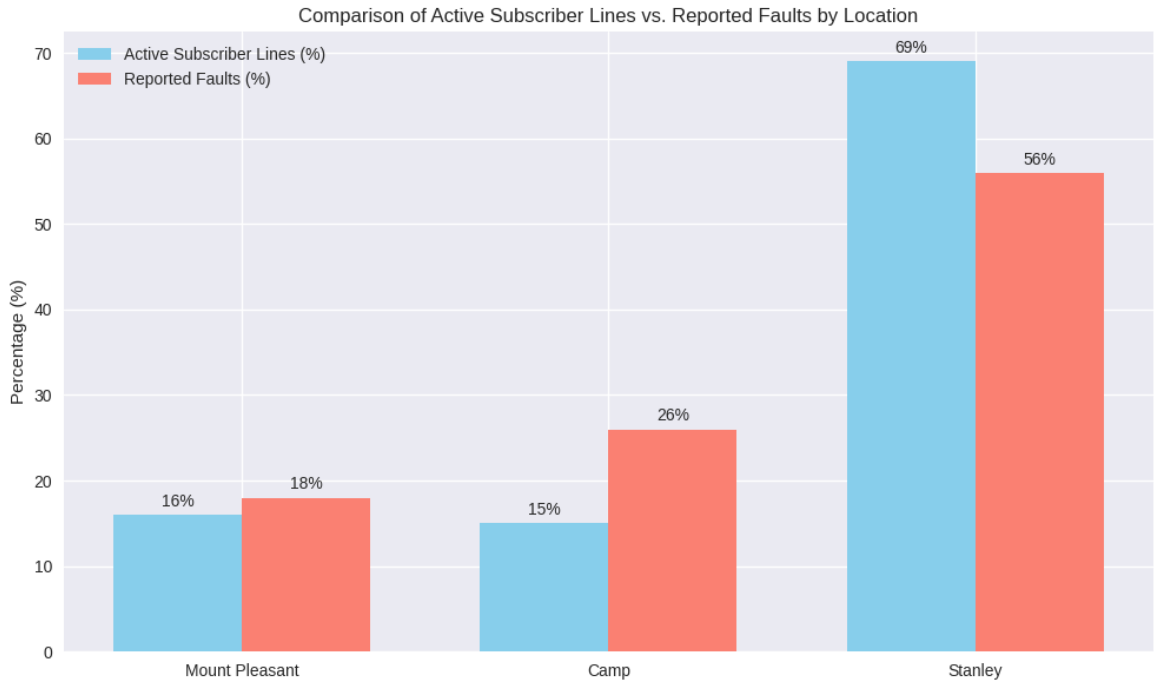
5. The fault reporting process, which is set out in detail within the Sure Code of Practice, is as follows:
 - a. Customers should report any fault with Sure supplied equipment or telephone line by calling the Sure fault reporting service on freephone 121 or by using the ‘report a fault’ link on the Sure website.
 - b. When a fault is logged, Sure staff may ask the customer to carry out a number of checks to assist with the fault detection process. Where these checks do not resolve the fault, Sure will log the fault and assign the work to a technician.
6. If the technician establishes that the fault is due to Sure equipment, the repair will be carried out within the Sure service charter timescales at no cost to the customer.
7. Where Sure has responsibility for fixing a fault, the target for responding to fault reports is within 1 working day for business lines and 2 working days for residential lines. The target for repair is 2 working days for business lines in Stanley, 3 working days for residential

lines in Stanley, and 5 working days for all lines in Camp. Beyond these targets, if the fault was not repaired and the fault was within Sure's control, a daily compensation credit must be paid for each whole day of lost service.

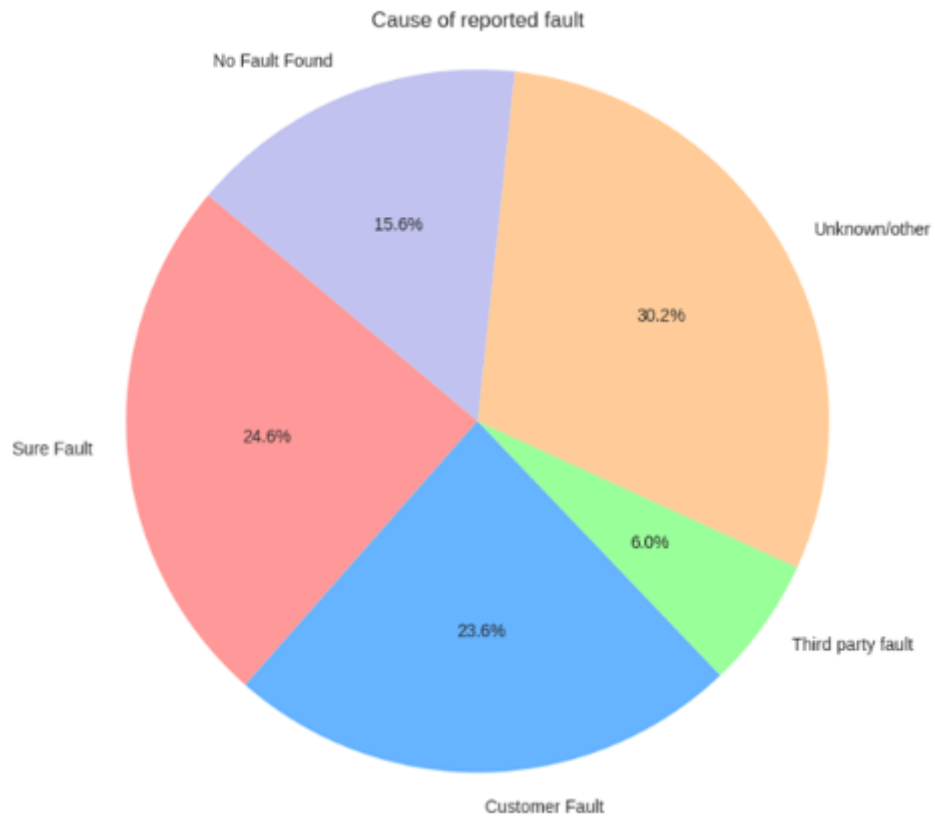
8. Once faults have been repaired Sure is required to ask the customer to complete a two-question satisfaction survey: one question about the Customer Support Assistant and one question about the way in which the fault repair was dealt with. If the customer remains unsatisfied once the complaint has been through the Sure complaints process the matter can be referred to the Communications Regulator.
9. The target for Sure is that 90% of faults in Stanley and 80% of faults in Camp should be repaired within the specified timescales. In respect to customer satisfaction, a minimum score of 6 out of 10 is required in the customer survey.
10. Sure's individual licence at paragraph 26 places obligations on Sure to publish information relating to quality of service if the Regulator directs Sure to do this. The Regulator has provided Sure with a template spreadsheet to complete each quarter covering the following information:
 - a. Number of faults reported by region.
 - b. Number of faults reported by customer type.
 - c. Services affected by reported faults (mobile/internet/fixed line/other).
 - d. Total faults by cause – specifically to identify genuine faults that are caused by Sure.
 - e. Time to resolve faults (in days) for residential and business subscribers.
 - f. Results of the customer satisfaction survey.

Faults in Q3 of 2025

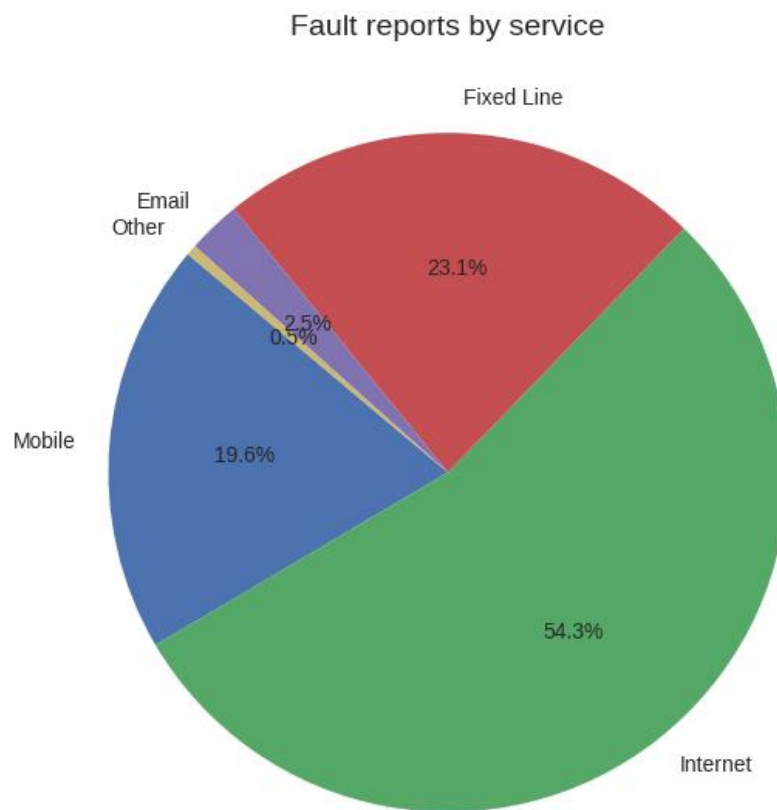
11. Sure has submitted the following fault data to the Communications Regulator. 199 faults were reported to Sure between July and September 2025. 112 faults were reported in Stanley, 36 at Mount Pleasant and 51 from Camp. Sure reported the lowest number of faults per active subscriber lines so far for 2025.
12. Mount Pleasant and Camp were overrepresented in the fault reporting data. Mount Pleasant and Camp form 16% and 15% of active subscriber lines but reported 18% and 26% of the total faults respectively. Whereas Stanley customers make up the remaining 69% of active subscriber lines but reported only 56% of the faults.



13. Out of the 199 faults logged with Sure, 49 were caused by Sure, and 47 by customer equipment or settings suggesting both network issues and user issues contribute significantly to the number of faults. The largest proportion, in 91 of the faults, either no cause was found or the reason for the fault was unknown. This suggests there may be gaps in Sure’s ability to diagnose issues or to confirm that no fault can be found.



14. In Q3, 76% of reported faults came from residential customers (152 cases), while 21% originated from business customers (42 cases). Residential faults showed a significant reduction of nearly 130 compared with Q1, which recorded 280 cases. Business faults have also fallen by a third with 60 reported in Q1 and 62 in Q2.
15. Internet services dominate fault reports, 54% of all faults reported, accounting for the majority of issues, but fixed line and mobile also show notable fault levels; 23% and 20% respectively.
16. Fault levels have reduced on all services throughout the year but there has been a significant decrease in the number of faults reported on fixed line services – from 100 in Q1, 59 in Q2 and 46 in Q3.



17. Sure's targets on fault levels as per the Direction are fewer than 7 faults per 100 subscriber lines in Stanley and fewer than 36 faults per 100 subscriber lines in Camp. These targets represent the different challenges to providing telecommunication services to customers in different geographical areas. This is currently under review.
18. During Q3 of 2025, Sure has met its fault level targets in Camp. However, Sure has not met its targets on the number of faults, caused by Sure, in Stanley. Sure also failed to meet this target in Q1 and Q2. Sure needs to reduce the number of faults in the remaining quarters to improve service levels for Stanley customers and avoid future penalties.

Number of faults (caused by Sure)	Number of faults (caused by Sure)	
	Stanley	Camp
Number of Sure faults this quarter	34	12
Target per 100 lines per annum	7	36
Actual per 100 lines this quarter	2.1	3.4
Has the target been met this quarter?	NO	YES

Fault Repairs

19. In Q3 of 2025, Sure failed to meet its targets for fault repair times for residential and business faults in both Stanley and in Camp.

Fault Repair	Residential		Business	
	Stanley	Camp	Stanley	Camp
Fault repair target (working days)	3	5	2	5
Target for % achieved within this time	90%	80%	90%	80%
Actual % achieved within the target time	51%	62%	58%	33%
Has the target been met this quarter?	NO	NO	NO	NO

20. For residential faults in Stanley, 35% were resolved within one working day and 49% within three working days. However, 30% took over 10 working days to resolve. For business faults in Stanley, 39% were resolved in one working day and 62% within three working days. 19% of business faults took longer than ten working days to resolve in Stanley.

21. For residential faults in Camp, 34% were resolved within one working day and 43% within three working days. 21% of faults were still unresolved after 10 working days. Camp businesses reported three faults in Q3, one of which was resolved within one day but the other two faults took over ten working days to resolve.

22. For residential faults at Mount Pleasant, 42% were resolved within one day but 50% of faults took ten working days or longer to be resolved. For businesses at Mount Pleasant, 46% of faults were resolved within one working day and 77% within three working days. Only two faults took longer than ten working days to be resolved.

23. Fault repair times are show below with numbers in green reflecting the number of faults repaired within Sure's target timelines, and the numbers in red where the target number of days has been missed.

FAULT REPAIR (time to closure)	Residential			Business		
	Stanley	MPA	Camp	Stanley	MPA	Camp
	Faults this quarter	86	19	47	26	13
1 working day	30	8	16	10	6	1
2 working days	7	0	3	4	2	0
3 working days	5	0	1	2	2	0
4 working days	2	0	0	1	0	0
5 working days	1	0	1	1	0	0
6 working days	0	0	2	0	0	0
7 working days	8	2	1	0	0	0
8 working days	2	0	0	1	0	0
9 working days	1	0	0	0	0	0
10+ working days	26	9	10	5	2	2

24. During Q3 of 2025, 55 faults took over ten working days to be resolved. Despite this, Sure report that just £61.25 in compensation was paid out in Q3. Sure’s Code of Practice which forms part of the Individual Operating Licence sets out what compensation customers are entitled to depending on their service type and the length of time they have waited for a repair to their fault:

Service Type	Respond within	Compensation - Stanley	Compensation - Camp
Business	1 working day	After 2 working days ^{4*} - a daily rental credit for each whole day that we are late in repairing the service ⁴	After 5 working days ^{4*} - a daily rental credit for each whole day that we are late in repairing the service ⁴
Residential	2 working days	After 3 working days ^{4*} - a daily rental credit for each whole day that we are late in repairing the service ⁴	After 7 working days ^{4*} - a daily rental credit for each whole day that we are late in repairing the service ⁴

This is subject to the following exclusion which must be applicable in the majority of the cases where the fault isn’t repaired within ten working days:

“Sure will not be responsible for delays or service failures outside of its control e.g. acts of nature, service failings of other providers, availability of transport to reach some Camp locations, customers delaying access to their premises.”

25. It is important that Sure is incentivised to investigate faults thoroughly as well as repair them in a timely manner. In Q3, around 25% took over ten working days to resolve yet only a fraction receive compensation suggesting that many delays are due to factors outside of Sure’s control. Data submitted to the Regulator does not distinguish between slow fault repair times due to delays from Sure or delays due to customer response time. It should be noted that Q3 takes place over the winter months where weather delays can be inevitable.

Customer satisfaction

26. Sure received feedback from 57 customers who provided satisfaction scores on the customer service from the Sure customer support assistant and on how Sure handled the fault. 96%, reported a 10/10 for the service received from a Sure customer support assistant an increase from Q1 and Q2 of 2025. Sure's target average score is 6/10 and the average score reported is 9.9/10. No customers scored Sure 6/10 or below.
27. 93% of customers awarded a customer satisfaction score of 10/10 for how Sure handled the fault. Sure's target average score is 6/10 and the average score reported is 9.8/10 which has increased from the previous quarter. In Q3, two customers reported a customer satisfaction score of how Sure handled the fault below 6/10.

RELIABILITY

28. Sure reports on key parameters of network and service reliability. These include: service delivery times, planned network outages and unplanned network outages across the network as a whole.
29. Sure's individual operating licence at paragraph 26 places obligations on Sure to publish information relating to quality of service if the Regulator directs Sure to do this. The Regulator has provided Sure with a template spreadsheet to complete each quarter covering the following information:
 - a. The number of planned network outages and the notification period given to customers on each occasion.
 - b. The number of unplanned network outages, the length of the outage, the approximate number of customers affected and the date at which significant outages are reported to the Regulator.
 - c. Service delivery times for residential lines, business and government lines and for broadband internet services.

Quality of Service targets

30. The target notification period for planned network outages is 72 hours.
31. The target reporting period for unplanned network outages is 5 days from the start of the relevant network outage.
32. For service delivery, the performance target for Sure is that 90% of services should be delivered within the specified timescales.
33. In 2023 a new KPI was introduced that service availability should exceed 95%. A KPI on line speed is in development and to be introduced for Q1 2027.

Outages

34. Between July and September (inclusive) 2025, there were three outages. Two of these outages were planned and one was unplanned. A planned outage is one that is scheduled, typically in off-peak hours, so that network maintenance may be undertaken. It is an outage for which Sure is able to notify consumers in advance.

35. Q3 saw a significant decrease in the number of planned and unplanned outages giving consumers access to their services more consistently and improving Sure's reliability.
36. For planned outages, consumers were given an average of 42 hours' notice. Both outages were in July. The first impacted all prepaid mobile customers (around 1600 consumers) across the islands between midnight and 3am. Consumers were given 83 hours notice of this planned outage. The second outage took place between 12pm and 3pm and impacted approximately ten mobile, broadband and landline customers in Camp (East Falkland). These customers received one hours' notice that there would be an outage. This reduced the average notification time for a planned outage to below Sure's target. An outage can be necessary to rectify a problem or improve service quality for consumers and Sure must balance adequate notification periods with quick fixes and service improvements for their customers.
37. The unplanned outage took place on Sunday 21 September from 2.10pm until 8.15pm. for just over four hours and impacted over 2500 broadband customers. International voice services, international SMS and mobile roaming was also affected. A report was provided to the Regulator within one working day detailing the failure of IP connectivity to both of Sure's geostationary (GEO) satellites via a third party. Sure's customers who were using low-earth-orbit (LEO) services customers were not impacted by the outage. Sure's 4G customers were impacted briefly until Sure migrated them temporarily onto their LEO system. Sure's diversification of off-island internet traffic using a mix of LEO and GEO satellites ensured that the impact on consumers was not a significant as it may otherwise have been. Sure reassures the Regulator that work with third parties to reduce the likelihood of unplanned outages is ongoing.

Service delivery times

38. Sure delivered 107 services over the third quarter of 2025. Similarly to the previous quarters of 2025, Sure performs well on service delivery with all services being delivered within the target delivery times.

Service delivery time (working days)	Services delivered in Stanley this quarter:			Services delivered in Camp this quarter:		
	Business / Government Lines	Residential lines	Broadband Internet Services	Business / Government Lines	Residential lines	Broadband Internet Services
Total number of services delivered	9	35	61	2	0	0
Average service delivery time (days)	3.3	3	1	7	0	0
Target service delivery time (days)	7	10	3	10	10	3
Number not meeting target	0	0	0	0	0	0

Line availability

39. Sure reported data on line availability for Q1 and Q2 of 2025. A number of probes measuring line availability are faulty and have been retired. Sure is migrating to using a new technology to report on the performance of the network from 2026 onwards. Whilst Sure has reported data on line availability and other metrics to the Communications Regulator for Q3 and Q4 of 2025, the technology has been in a testing phase during this period and will not be reported at this time.
40. From Q1 of 2026, Sure will report to the Regulator and the Regulator will publish as part of these quarterly quality of service reports, data on the following:
 - a. Availability of Sure's network (line availability)
 - b. Ping (latency) reflecting network responsiveness
 - c. Download speeds (line speeds)
 - d. HTTP performance assessing how servers from Sure and external networks respond

COMPLAINTS

41. The complaints process, which is set out in detail within the Sure Code of Practice, involves two stages:
 - a. Stage 1 – The customer contacts Sure either by post (to Sure, Ross Road, Stanley, PO Box 584) or by emailing complaints@sure.co.fk. A customer service assistant will deal with the complaint in up to 7 working days.
 - b. Stage 2 – If the customer is unhappy with the way the complaint was handled, or it has not been resolved to the customer's satisfaction, the complaint may be escalated to the Sure Management Team. The complaint will be reviewed by the Retail, Marketing and Customer Services Manager and the Sure Chief Executive. This escalated complaint will be acknowledged in 3 working days and responded to in a further 7 working days.
42. At the end of each stage Sure asks the customer whether they agree that the complaint has been resolved. For resolved complaints the customer is asked to complete a two-question satisfaction survey: one question about the Customer Support Assistant and one question about the way in which the complaint was dealt with. If the customer remains unsatisfied once the complaint has been through the Sure complaints process the matter can be referred to the Communications Regulator.
43. The target for Sure is that 90% of both Stage 1 and Stage 2 complaints should be resolved within the specified timescales. In respect to customer satisfaction, a minimum score of 6 out of 10 is required in the customer survey.
44. Sure's individual licence at paragraph 26 places obligations on Sure to publish information relating to quality of service if the Regulator directs Sure to do this. The Regulator has provided Sure with a template spreadsheet to complete each quarter covering the following information:

- c. Number of Stage 1 complaints received
- d. Total number that breached the 7-day response time
- e. Number of complaints received in the reporting period that progressed to Stage 2. This figure will include those complaints that were received in a previous quarter but may not have been escalated to the current reporting period. The figures are tracking the life of a complaint received in the relevant quarter. This figure will be updated by Sure at each quarterly submission should that be required.
- f. Number of complaints received in the reporting period escalated to the Regulator following completion of Stage 2.

45. Four targets concerning the handling of complaints were specified in the Direction:

- g. At least 90% of Stage 1 complaints to be responded to within 7 days
- h. At least 90% of Stage 2 complaints to be acknowledged in 3 working days and resolved within a further 7 working days
- i. Customer satisfaction with the Customer Service Assistant handling the complaint to be scored at least 6 out of 10
- j. Customer satisfaction with the complaints process to be scored at least 6 out of 10

Complaints in Q3

46. Three complaints were received by Sure between July to September 2025. Two complaints were on the reliability of internet services and one complaint was on the reliability of landline services. All complaints were resolved within 7 working days. No complaints were escalated to stage 2 of the complaint process or referred to the Regulator.

47. Sure received more complaints in Q3 than it did in Q1 and Q2 of 2025 (where only one complaint was received in each quarter). This may be the result of Sure's new way of differentiating between faults and complaints by having a dedicated email address to raise a complaint (falklands.complaints@sure.com). It is positive that all complaints were resolved at stage 1 of the complaints process.

48. The Communications Regulator has agreed with Sure that the number of complaints are so low that customer satisfaction scores on the complaint process would be too small of a sample size to analyse. Sure is therefore not required to report against the targets (i) and (j) outlined above in paragraph 45.

CONCLUSION

49. The Regulator is pleased to see a decrease in the number of faults in Q3 compared with Q1 and Q2 of 2025, however Sure continues to suffer with high fault levels, particularly in Stanley where their target is more challenging. Fault repair times are also not on target for both Stanley and Camp customers.

50. The Regulator urges Sure to strive to reduce faults caused by Sure's equipment or network for the remaining quarter of 2025 and into 2026 and speed up fault repair times.

51. Sure's customer satisfaction scores continue to be high and Q3 has seen impressive service delivery times. Reliability has improved with significantly less outages both planned and unplanned and the low number of complaints have all been resolved within seven working days.

Communications Regulator

January 2026