From: Vandendries, Frans <frans.vandendries@time4lime.com>
Sent: 28 June 2013 13:16
To: Mark Connors
Cc: Tony Ritch; Rod Kirwan; Jayne Woollard; Consultations
Subject: Re: ICTA Filing - Changes to Direct Internet Access Service

Sorry, Mark, here is the final document (same prices, just took out the "draft" warning in the document title).

Regards

On 28 June 2013 13:11, Vandendries, Frans <frans.vandendries@time4lime.com> wrote:

Thanks for the explanation, Mark. I have attached the wholesale rate sheet that I will ask Carrier to publish.

Have a great weekend

Frans

On 28 June 2013 11:50, Mark Connors <mark.connors@icta.ky> wrote:

Hi Frans

While I've seen printing and formatting differences with Excel on different computers, I've never come across a situation where Excel does calculations differently on different computers.

I've had a look at the spreadsheet you sent and there are two differences between our methodologies. The first is related to the difference between displayed values and underlying values and the second is related to the recalculation of the contracted wholesale rates by applying a discount to the related monthly rate instead of directly discounting the corresponding retail rate.

As an example of the difference between displayed and underlying values, assume an entered value or calculated value in an Excel cell is "375.60". Using the cell format or Decrease Decimal button to change the number of displayed decimals from 2 to 0, will display "376" in the cell but the underlying value remains unchanged at "375.60". If that cell is used in any further calculations, the calculations will use "375.60" and not "376". Also, a cut and paste from Excel to Word copies over the displayed values not the underlying values.

As the wholesale rates are required to be 20% off the retail rates, the calculation of the wholesale rates should be based on the actual retail rate (in our example "376") and not the underlying value (in our example "375.60").

In order to change the underlying value to match the rounded displayed number, you would use the ROUND function. To round to no decimal places it would be =ROUND(375.60.0).

To see this, I've added a few scenarios to your spreadsheet.

The first one is the one you provided,

For the second one, I changed the display parameter (without changing the calculations) to show the underlying values that are in the cells you calculated.

For the third one, I changed the formula to include a ROUND function which will force the underlying value to equal the rounded value. So that you can see the effect, I left the displayed decimal places at 2. This shows that the underlying values have been changed to the rounded values.

The fourth scenario shows the problem with the methodology used in the first three scenarios of recalculating the retail rate by applying a term discount factor to the wholesale monthly rate rather than simply discounting the actual retail rate by 20%. To see this issue, look at the example of the retail 1 yr rate for 70 Mbps which is $7,883. Using your methodology of taking .75 of the non-contracted rate of 8409, you get a monthly rate of 6306.75 which would round to 6307. However, directly applying the .8 factor to the 1 yr retail rate of 7883 will get a wholesale rate of 6306.40 which would round to 6306. To avoid this issue, the wholesale rate should always be calculated directly as .8 of the retail rate.

So, in order to calculate retail and wholesale rates, you would use the ROUND function to calculate the retail rates and you would use the ROUND function to calculate the wholesale rates as .8 of the rounded retail rates (this is done in the fourth scenario). This will ensure that the wholesale rates are 20% off the retail rates. (I've left them displayed at two spaces after the decimal, but they can be displayed with no decimal places without changing the values.)

Only the last set of rates are properly calculated, the other ones have methodology errors.

If, after you go though this, you would like to discuss, please feel free to give me a call.

.....mark

(345) 746-9620

From: Vandendries, Frans [mailto:frans.vandendries@time4lime.com]
Sent: 27 June 2013 18:50
To: Mark Connors
Cc: Tony Ritch; Rod Kirwan; Jayne Woollard; Consultations
Subject: Fwd: ICTA Filing - Changes to Direct Internet Access Service

Mark,

Thanks for your comments below.

For the first item, I had thought I had used the final version of Revision 5 as the basis for making the changes to Revision 6. Clearly a change was made to 204.1.4) between my Word version and the PDF

version on the website. There was no intent to make a change to 204.1.4), which is why there was no "track change". The "128" language is in fact more appropriate, and I'll reflect it in the final version.

For the second item, as with the previous item, those were changes that did not show up in what I thought was the "final" revision 5. The language that is in the present tariff on the website is more appropriate, and we can make those "changes" to the final version.

For the third item, I cannot explain the rounding. After the Broadband filing, I decided to use Excel, the attached table in particular, to do the discount calculations and rounding. I then simply cut and pasted those figures into the document. As it turns out, the way I calculated and rounded (using the Decrease Decimal function) seems to have let to a different result than the way you did. And just in case Excel works differently on different computers, I've also attached a PDF print of the Excel workbook that I see on mine. I'd be happy to make any necessary adjustments to the wholesale rates, but I'd also be grateful if you can let me know where our two methodologies diverged.

For the fourth item, my Word version does not have split tables. However, I agree with you and we can ensure there are none in the final PDF version.

I have attached clean and revision versions of the Tariff Item, as well as a PDF version (which would be posted to the website). Please let us know if there is anything else.

Regards

Frans

---------- Forwarded message ----------
From: **Anthony Ritch** <anthony.ritch@time4lime.com>
Date: 27 June 2013 18:18
Subject: Fwd: ICTA Filing - Changes to Direct Internet Access Service
To: Frans Vandendries <frans.vandendries@lime.com>

Frans,
As per our discussion on this.

Regards,

Tony

+1 (345) 747-3200 (W)
+1 (345) 916-2179 (M)

Sent from my iPhone 4S from LIME

Begin forwarded message:

From: Mark Connors <mark.connors@icta.ky>
Date: June 26, 2013, 1:03:51 PM EST
To: Anthony Ritch <anthony.ritch@lime.com>
Cc: "Woollard, Jayne" <jayne.woollard@time4lime.com>, Roderick Kirwan <Rod.Kirwan@time4lime.com>, Consultations <consultations@icta.ky>
Subject: RE: ICTA Filing - Changes to Direct Internet Access Service

Hi Tony

I've had a look through the service filing and there are a number of items.

1) Item 204.1.4) of the revision 5 version of the tariff page 2.28 (available on LIME website at http://www.time4lime.com/files/legal/cayman_islands/tariffs/Item-204_-_Internet-Access-Services_-_Dedicated-Internet-Access.pdf) states that "C&W offers Bandwidths ranging from 128 kbps to 100Mbps". The tracked changes version of the tariff pages that were submitted with the service filing now show that sentence as saying "C&W offers Bandwidths ranging from 64 kbps to 100 Mbps". There are two problems with this. First, the tracked changes version should track all changes that LIME is proposing to make with the revision. (The tracked changes version helps the Authority to more efficiently review the service filings.) Second, while the service description has been changed to say speeds as low as 64 kbps are offered, none of the rate tables in Item 204.4 list any speeds less than 128 kbps. It's not clear to me why this change was made. Please provide an explanation as to why the wording change in Item 204.1.4) has been made.

2) In the tracked changes version, the word "either" has been added to Item 204.3.6) and the word "before" has been removed from Item 204.4.a) but those changes are not noted as a tracked change. I'm okay with those changes, but please make sure that all changes from the previous revision are tracked.

3) The rounding on some of the wholesale rates doesn't make sense to me. For example, the monthly 2 yr retail rate for 2 Mbps is $438. The unrounded wholesale rate would be $350.40. Even though the unrounded amount ends in .40, the wholesale table rounds that rate up to $351. As another example, the monthly 3 yr retail rate for 2 Mbps is $376. The unrounded wholesale rate would be $300.80. Even though the unrounded amount ends in .80, the wholesale table rounds that rate down to $300. I don't have a problem with rounding the wholesale rates to the nearest dollar as has been done for the contract rates for retail services, but the rounding should follow normal rounding rules. The cells highlighted in yellow in attached file show the wholesale rates that have rounding issues.

4) A minor formatting suggestion: the table in Item 204.4,d) is split over two pages (2.32 and 2.33); a hard page break in front of that item "d)" would allow the full paragraph associated with the table and the full table itself to be on page 2.33. This would improve the readability of the tariff page without adding to the page count.

If you would like to discuss any of the above please feel free to contact me.

....mark

Mark Connors
Head of Economics and Regulation
Information and Communications Technology Authority
Cayman Islands
Phone: (345) 746-9620
Fax: (345) 945-8284

From: Woollard, Jayne [mailto:jayne.woollard@time4lime.com]
Sent: 25 June 2013 17:20
To: Consultations; Anthony Ritch; Roderick Kirwan
Subject: ICTA Filing - Changes to Direct Internet Access Service

Good Afternoon,

Please find attached Confidential and Redacted documents pertaining to the above subject matter. Signed original documents will be delivered to your offices.

Please do not hesitate to contact me should you have any questions.

Kindest Regards,

Jayne Woollard
PA - General Manager
D: +1 345 815 3550
M: +1 345 926 5533

Jayne.Woollard@lime.com

Cayman Islands
www.lime.com

Follow us on

--

Frans Vandendries
Vice President Legal Regulatory and Corporate Affairs

D: +1 345 747 3644
M: +1 345 916 0831
F: +1 345 949 1876
frans.vandendries@lime.com
PO BOX 2425, Grand Cayman, Cayman Islands
www.time4lime.com

Attention:
This e-mail message has been scanned for viruses and content. The information contained in this e-mail is confidential and may also be subject to legal privilege. It is intended only for the recipient(s) named above. If you are not named above as a recipient, you must not read, copy, disclose, forward or otherwise use the information contained in this e-mail. If you have received this e-mail in error, please notify the sender (whose contact details are above) immediately by reply e-mail and delete the message and any attachments without retaining any copies.

--

Frans Vandendries
Vice President Legal Regulatory and Corporate Affairs

D: +1 345 747 3644
M: +1 345 916 0831
F: +1 345 949 1876
frans.vandendries@lime.com
PO BOX 2425, Grand Cayman, Cayman Islands
www.time4lime.com

--

Frans Vandendries
Vice President Legal Regulatory and Corporate Affairs

D: +1 345 747 3644
M: +1 345 916 0831
F: +1 345 949 1876
frans.vandendries@lime.com
PO BOX 2425, Grand Cayman, Cayman Islands
www.time4lime.com

Attention:
This e-mail message has been scanned for viruses and content. The information contained in this e-mail is confidential and may also be subject to legal privilege. It is intended only for the recipient(s) named above. If you are not named above as a recipient, you must not read, copy, disclose, forward or otherwise use the information contained in this e-mail. If you have received this e-mail in error, please notify the sender (whose contact details are above) immediately by reply e-mail and delete the message and any attachments without retaining any copies.

Wholesale DIA Prices
Effective 1 July 2013

Term commitment / monthly charges CI$				
Speeds	**Monthly**	**1 year (25%)**	**2 year (30%)**	**3 year (40%)**
1 Mbps	397	298	278	238
2 Mbps	501	376	350	301
3 Mbps	614	461	430	369
4 Mbps	718	539	503	431
5 Mbps	860	645	602	516
6 Mbps	1011	758	708	606
7 Mbps	1134	851	794	681
8 Mbps	1276	957	894	766
9 Mbps	1427	1070	999	856
10 Mbps	1569	1177	1098	942
20 Mbps	3071	2303	2150	1842
30 Mbps	4536	3402	3175	2722
40 Mbps	4857	3642	3400	2914
50 Mbps	6796	5097	4758	4078
60 Mbps	7225	5418	5058	4335
70 Mbps	8409	6306	5886	5046
80 Mbps	9593	7194	6715	5756
90 Mbps	10777	8082	7544	6466
100 Mbps	11762	8822	8233	7057