From: Mark Connors
Sent: 26 June 2013 13:04
To: Anthony Ritch

Cc: Woollard, Jayne; Roderick Kirwan; Consultations

**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 <a href="http://www.time4lime.com/files/legal/cayman\_islands/tariffs/Item-204\_- Internet-Access-Services\_- Dedicated-Internet-Access.pdf">http://www.time4lime.com/files/legal/cayman\_islands/tariffs/Item-204\_- Internet-Access-Services\_- Dedicated-Internet-Access.pdf</a>) 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

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