

Value Every Moment

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One Technology Square
19 Eastern Avenue
P.O. Box 293
Grand Cayman, KY1 - 1104
Cayman Islands.

P: +1 345 949 7800

F: +1 345 949 7646



Our ref: GRRCR 15.28

22 November 2012

Mr. David Archbold
Managing Director
Information and Communications Technology Authority
PO Box 2502
3rd Floor Alissta Towers
Grand Cayman, KY1-1104

Dear Mr. Archbold,

Re: Cable and Wireless ISDN Service

Cable and Wireless (Cayman Islands) Limited trading as LIME ("LIME") submits the following response to the Authority's 15 November 2012 letter enclosing interrogatories about LIME's 19 October 2012 retail service filing. LIME proposed redactions to the questions are indicated in the attached through the use of "#" and shading in grey. In brief, LIME requests that the Authority remove explicit references to the intent of the filing (a move to per-second billing) and the specific service under consideration (ISDN PRI). Please note that this includes references to "ISDN PRI per-second" in the subject line of the letter.

Disclosure of this specific information would give LIME's competitors very detailed information about LIME's marketing and pricing plans. This is information of a commercial nature that is consistently treated in a confidential manner by LIME until the plans are implemented. Any untimely disclosure would mean that LIME's competitors and potential competitors would gain advance knowledge of LIME's marketing and pricing plans, which would enable them to develop competitive and targeted marketing and pricing responses, even before LIME would be permitted to implement its own plans. Furthermore, if this information were placed in the public domain, LIME would be adversely affected and suffer direct and indirect financial harm, because it is proprietary commercial information which is customarily guarded from competitors.

LIME notes the Authority's comment regarding maintaining "a full public record". However, LIME had requested confidential treatment of its entire application, including the fact of its existence, until such time as the service and products described in it had been implemented.

The market for these services is in fact highly contested, and it is inappropriate in those circumstances for competitors to use the regulator as a means of gaining advance knowledge of LIME's commercial and competitive initiatives and then use that information to harm LIME. LIME asks, therefore that the Authority consider favorably LIME's original request for confidentiality.

Yours faithfully,

Cable and Wireless (Cayman Islands) Ltd.

'Signed'

Anthony Ritch
General Manager

c.c. Frans Vandendries, VP Legal Regulatory and Corporate Affairs, LIME
David E. Burnstein, Regulatory Finance Manager, LIME

Mark Connors

From: Woollard, Jayne [jayne.woollard@time4lime.com]
Sent: 30 May 2013 15:16
To: Mark Connors; David Archbold; Russell Richardson; Glen Daykin; Anthony Ritch; Vandendries, Frans; David Burnstein
Subject: Re: LIME Request - Revision of ISDN Service and Tariff
Attachments: 12_11_15_ICTA_interrogatories_ISDN_PRI_per_second_billing - public.doc

Dear Mr. Connors.

As requested please find attached the redacted version of the response from LIME to the Authorities 15th November letter.

Please do not hesitate to contact me if we can be of further assistance,

Kindest Regards,





Jayne Woollard
PA - General Manager

D: [+1 345 815 3550](tel:+13458153550)
M: [+1 345 926 5533](tel:+13459265533)

Jayne.Woollard@lime.com

Cayman Islands
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On 30 May 2013 13:57, Mark Connors <mark.connors@icta.ky> wrote:

Tony

In a 15 Nov 2012 letter to LIME, the Authority directed LIME to provide a redacted version of that interrogatory letter to the Authority by 22 November 2012 redacting the portions of the questions that LIME considered confidential.

In response to that direction, on 22 Nov 2012, LIME replied with the attached email.

The redacted version of the ICTA letter supplied by LIME does not follow the normal redaction method used by LIME. For example, certain information is greyed out rather than redacted and the document is labelled "Confidential" rather than "Redacted".

Please confirm by 3 pm on Monday, **3 June 2013**, that the file named "12_11_15_ICTA_interrogatories_ISDN_PRI_per_second_billing - confidential - requested redaction-2.doc" in the attached email is what LIME intended to submit as the redacted version in response to the Authority's direction.

Thanks

....mark

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

----- Forwarded message -----

From: "Woollard, Jayne" <jayne.woollard@time4lime.com>

To: Mark Connors <mark.connors@icta.ky>

Cc: Anthony Ritch <anthony.ritch@lime.com>, David Archbold <david.archbold@icta.ky>, Russell Richardson <Russell.Richardson@icta.ky>, Glen Daykin <glen.daykin@icta.ky>, "Vandendries, Frans" <frans.vandendries@lime.com>, David Burnstein <david.burnstein@time4lime.com>

Date: Thu, 22 Nov 2012 13:24:51 -0500

Subject: Re: LIME Request - Revision of ISDN Service and Tariff

Dear Mr. Connors,

Further to the letter from the Authority dated 15th November 2012, regarding ISDN PRI per-second billing option, LIME was requested to provide the authority with a version of the ICTA letter redacting the questions that LIME considered confidential.

As directed, please find attached response from LIME.

Please do not hesitate to contact me if you have any questions,

Kindest Regards,

Jayne Woollard





PA - General Manager

D: [+1 345 815 3550](tel:+13458153550)
M: [+1 345 926 5533](tel:+13459265533)

Jayne.Woollard@lime.com

Cayman Islands
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On 15 November 2012 09:33, Mark Connors <mark.connors@icta.ky> wrote:
Tony

Please see the attached for interrogatories concerning the service filing.

I'll provide it in MS Word format to make it easier to cut and paste the questions in the response document.

....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: 19 October 2012 14:45

To: David Archbold; Russell Richardson; Mark Connors; Glen Daykin; Anthony Ritch; Vandendries, Frans; David Burnstein

Subject: LIME Request - Revision of ISDN Service and Tariff

Good Afternoon,

Please find attached 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](tel:+13459265533)

Jayne.Woollard@lime.com

Cayman Islands
www.lime.com

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PO Box 2502
Grand Cayman KY1-1104
CAYMAN ISLANDS
Tel: (345) 946-ICTA (4282)
Fax: (345) 945-8284
Web: www.icta.ky

Information & Communications Technology Authority

*** * * REDACTED * * ***

Our ref: ICTA/140/161-09

15 November 2012

Mr. Anthony Ritch
Country Manager
LIME/Cable and Wireless (Cayman Islands) Limited
PO Box 293
Grand Cayman KY1-1104
CAYMAN ISLANDS

Dear Mr. Ritch,

Re: ### billing option

The Information and Communications Technology Authority (the "Authority") is continuing its assessment of the service filing that was submitted by Cable and Wireless (Cayman Islands) Limited ("LIME") on 19 October 2012.

In order to continue its review, the Authority requests LIME to provide responses to the following questions as soon as possible. When responding, please repeat the entire question above the corresponding response to each question.

As these questions may relate to information for which LIME has claimed confidentiality, in repeating these questions in its responses, LIME may redact the portions of the questions it considers confidential. If LIME files any information in confidence with the Authority, it should also file Redacted versions for the public record.

At this time, the Authority is providing the Attachment in confidence to LIME. However, in order to maintain a full public record, LIME is hereby directed to provide a redacted

REDACTED

version of this letter to the Authority by **22 November 2012** redacting the portions of the questions that it considers confidential.

If LIME has any questions about the contents of these interrogatories, please feel free to contact me via email at mark.connors@icta.ky or via phone at (345) 746-9620.

1. The covering letter indicates that, for ### customers who sign a one-year contract, domestic voice calling would be charged ###. However, while the table in proposed tariff item ###. Therefore, the table indicates that a ## fixed-to-fixed call would be rated at \$1.27 (###). This does not appear to be the intent of the service filing. Please provide revised proposed tariff pages that show the rates are ###.

2. LIME's imputation test uses information from the FLLIRC model to estimate the average fixed-to-fixed call duration. In order for the Authority to assess the reasonableness of that assumption and other imputation test assumptions, please provide the following information in a spreadsheet format for each of the six most recently billed months:
 - a) the number of accounts as of month-end who subscribed to ##,
 - b) the number of ### installed as of month-end,
 - c) the number of billed local voice fixed-to-fixed minutes for ### for the month,
 - d) the number of billed local voice fixed-to-fixed calls for ### for the month,
 - e) the total billed local voice fixed-to-fixed charges ##,
 - f) the total billed local voice fixed-to-fixed charges which would apply ##,
 - g) the number of billed local voice fixed-to-mobile minutes for ### for the month,
 - h) the number of billed local voice fixed-to-fixed calls for ### for the month,
 - i) the total billed local voice fixed-to-mobile charges ##, and
 - j) the total billed local voice fixed-to-mobile charges which would apply ##.

3. In order for the Authority to assess the reasonableness of the estimated per minute revenue used in the imputation test, please provide the detailed call records in a spreadsheet format for all ## for each of the six most recently billed months containing a record for each local voice call with the following data elements:
 - a) a unique customer identifier,
 - b) a call record identifier,
 - c) an indicator of whether the call was to a fixed or a mobile number,
 - d) call duration in seconds,
 - e) amount billed by LIME ###, and
 - f) amount that would be billed by LIME ##.
4. Identify whether the source minute information from "FLLRIC Fixed Module, Volume Input for TD, cell Z31 & Z33" is actual network usage minutes or billed minutes. For per-minute billing, "billed minutes" is used to refer to the rounded up full minute count to which the per-minute rate is applied. For example, with a 2 minute 30 second call, the actual network usage minutes would be 2.5 minutes but the billed minute count would be 3 minutes.
5. LIME's imputation test uses the per-call and per-minute charges from the "PSTN Termination Part" of the interconnection agreement as the interconnection charge components but does not apply the per-call or per-minute "Transit Part" charges. Identify whether LIME incurs any "Transit Part" charges for calls to other local operator networks. If LIME, does incur such charges, provide a detailed explanation of why they have not been included in the imputation test. If LIME does not incur any "Transit Part" charges, provide a detailed explanation of the network interconnections it has with other local operators which allows it to avoid such charges.
6. LIME's proposed imputation test uses the per-minute charges from the "Mobile Termination Part" of the interconnection agreement as the interconnection charges component but does not apply the per-call or per-minute "Transit Part" charges. Identify whether LIME incurs costs for the functions covered by the "Transit Part" charges for calls from its own fixed network to its own mobile network. If LIME, does incur such costs, provide a detailed explanation of why they have not been included in the imputation test. If LIME does not incur such costs, provide a detailed explanation of the network interconnection arrangements it has which allows it to avoid such costs including an explanation of how those arrangements differ from the arrangements LIME uses when it applies the transit charges to the traffic of other operators.

7. For its estimate of retail costs for the fixed-to-fixed and fixed-to-mobile imputation tests, LIME has used "non-network cost including overhead" from the 2003 Cayman FAC Model. Identify where the network related costs for originating traffic are included in the imputation test. If such costs have not been included, provided a detailed justification for their exclusion.
8. Identify where costs associated with the revenue based license Royalty and Regulatory fees have been included in the imputation test. If such costs have not been included, provide a detailed justification for their exclusion.
9. Identify where common costs, which LIME has included in previous imputation tests as a factor applied on total costs, have been included in the imputation test. If such costs have not been included, provide a detailed justification for their exclusion.

Yours sincerely,

[signed]

Mark Connors
Head of Economics and Regulation