



**CABLE & WIRELESS**

Cable & Wireless  
(Cayman Islands) Limited

P.O. Box 293  
Grand Cayman KY1-1104  
Cayman Islands.

www.cw.ky

Telephone +1 (345) 949-7800  
Fax +1 (345) 949 7962

Our ref: GRCCR/GR 15.19  
25 May 2007

Mr. David Archbold,  
Managing Director,  
Information and Communication Technology Authority,  
3<sup>rd</sup> Floor Alissta Towers,  
P.O. Box 2502GT,  
Grand Cayman. KY1-1104

Dear Mr. Archbold:

**Re: Public Consultaion on Costing Manual – CD 2005-1 – ICTA/Telcordia  
Second Round Interrogatory - Responses**

Please find attached responses to a portion of the interrogatories issued on 16 April 2007 (ICTA/80/105/105-11).

In filing this partial response we make reference to our 16 May 2007 letter requesting an extension and staggered filing of the responses and your email approval of 17 May 2007. For ease of reference 49 of the seventy interrogatories were responded to on 17 May 2007, twelve interrogatories are being responded to today, seven on June 1, and the final two on June 8. We attach below the schedule we are operating towards.

| <i>Count</i> | <i>Interrogatory</i> | <i>Proposed date of Submission</i> | <i>Count</i> | <i>Interrogatory</i> | <i>Proposed date of Submission</i> |
|--------------|----------------------|------------------------------------|--------------|----------------------|------------------------------------|
| 1            | 2.1.1                | May 17                             | 36           | 3.2.2                | June 1                             |
| 2            | 2.1.2                | May 17                             | 37           | 3.3.1                | May 17                             |
| 3            | 2.1.3                | May 17                             | 38           | 3.3.2                | May 25                             |
| 4            | 2.1.4                | May 17                             | 39           | 3.4.1                | May 25                             |
| 5            | 2.1.5                | May 17                             | 40           | 3.4.2                | June 1                             |
| 6            | 2.1.6                | May 25                             | 41           | 3.4.3                | May 25                             |
| 7            | 2.1.7                | May 25                             | 42           | 3.5.1                | May 17                             |
| 8            | 2.1.8                | May 17                             | 43           | 3.6.1                | May 17                             |
| 9            | 2.1.9                | May 17                             | 44           | 3.6.2                | May 25                             |
| 10           | 2.2.1                | May 17                             | 45           | 3.6.3                | May 17                             |

|    |        |                   |    |        |        |
|----|--------|-------------------|----|--------|--------|
| 11 | 2.3.1  | June 1            | 46 | 3.6.4  | May 17 |
| 12 | 2.4.1  | May 17            | 47 | 3.6.5  | May 17 |
| 13 | 2.4.2  | May 17            | 48 | 3.7.1  | May 25 |
| 14 | 2.4.3  | May 25            | 49 | 3.8.1  | May 25 |
| 15 | 2.5.1  | May 17            | 50 | 3.9.1  | May 17 |
| 16 | 2.5.2  | May 17            | 51 | 3.9.2  | May 17 |
| 17 | 2.5.3  | May 17            | 52 | 4.1.1  | May 17 |
| 18 | 2.5.4  | May 17            | 53 | 4.1.2  | June 1 |
| 19 | 2.5.5  | May 17            | 54 | 4.2.1  | June 1 |
| 20 | 2.6.1  | May 17            | 55 | 4.3.1  | May 17 |
| 21 | 2.6.2  | May 17            | 56 | 4.4.1  | May 25 |
| 22 | 2.6.3  | May 17            | 57 | 4.4.2  | May 25 |
| 23 | 2.6.4  | May 17            | 58 | 4.5.1  | June 1 |
| 24 | 2.6.5  | May 17            | 59 | 5.1.1  | May 17 |
| 25 | 2.6.6  | May 17            | 60 | 5.1.2  | May 17 |
| 26 | 2.6.7  | May 17            | 61 | 5.1.3  | May 17 |
| 27 | 2.6.8  | May 17            | 62 | 5.1.4  | May 17 |
| 28 | 2.6.9  | May 17            | 63 | 5.1.5  | May 17 |
| 29 | 2.6.10 | May 17            | 64 | 5.1.6  | May 17 |
| 30 | 2.6.11 | May 25            | 65 | 5.1.7  | May 17 |
| 31 | 2.6.12 | May 17            | 66 | 5.1.8  | May 17 |
| 32 | 2.7.1  | June 8            | 67 | 5.1.9  | May 17 |
| 33 | 2.7.2  | June 8            | 68 | 5.1.10 | May 17 |
| 34 | 3.1.1  | Already Submitted | 69 | 5.1.11 | May 17 |
| 35 | 3.2.1  | June 1            | 70 | 5.1.12 | May 17 |

## Confidentiality Claim

Pursuant to Regulation 3 of the *Information and Communications Technology Authority (Confidentiality) Regulations, 2003* ("Regulations"), C&W hereby requests that some of the information in this submission be designated "confidential". This information consists primarily of confidential and highly sensitive cost information.

Further to Regulation 3(b), the information is commercial information, the details of which are treated consistently in a confidential manner by C&W and are not otherwise publicly available. C&W notes that this information on C&W costs appears in highly disaggregated and granular form. C&W treats such information as confidential, and does not release it to any persons other than those within the company who strictly need to know.

Further to Regulation 3(d)(i), disclosure of the cost information in this submission can reasonably be expected to result in significant financial loss to C&W, and significant financial gain to its competitors, if it were disclosed to the public. Disclosure would enable them to develop competitive and targeted marketing and pricing strategies, designed to "cherry-pick" customers in Cayman.

Further to Regulation 3(d)(ii), disclosure of the cost information can reasonably be expected to prejudice the competitive position of C&W. C&W notes that disclosure of

the information would provide to C&W's actual and potential competitors details of C&W's cost structure. C&W's competitors and potential competitors would use this information to create marketing strategies that would more effectively respond to C&W's marketing and pricing strategies, which would significantly impair C&W's competitive position in a highly competitive marketplace.

Please contact me regarding any questions you may have.

Yours faithfully,  
Cable & Wireless (Cayman Islands) Ltd.

"Signed"

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Rudy B. Ebanks  
Chief Regulatory and Carrier Relations Officer

cc: Timothy Adam, Chief Executive C&W  
Ian Tibbetts, Chief Operating Officer C&W  
Frans Vandendries, Vice President Regulatory Affairs C&W  
Erik Whitlock, Regional Vice President Regulatory Finance C&W  
Interested Parties in CD (2005) - 1