
From: Burnstein, David [david.burnstein@time4lime.com]
Sent: 04 April 2013 15:12
To: Mark Connors; Consultations; Anthony Ritch; Vandendries, Frans; David Burnstein; regulatory@lime.com; Chris.Hayman@digicelgroup.com; Raul.Nicholson-Coe@digicelgroup.com; Nadine.Ramsay@digicelgroup.com
Subject: Re: LIME Response to ICTA and Digicel Interrogs (CD2012-1) - public copy
Attachments: 2013 03 28 LIME Letter - response to ICTA and Digicel interrogs_CD2012-1_v2.pdf
Categories: Green Category

Good afternoon.

Per instructions from the Authority, LIME is redistributing an amended version of the cover letter to its 28 March 2013 submission. In particular, the amended cover letter now (1) identifies the file names of all attachments that accompanied LIME's submission and (2) indicates that LIME's responses to outstanding interrogatories will be forthcoming Friday, 12 April 2013. Please reply if you have any questions.

Regards,
David Burnstein

On 4 April 2013 09:39, Burnstein, David <david.burnstein@time4lime.com> wrote:
Good morning.

LIME's submission on 28 March 2013 week was missing a cover letter. Please find attached the cover letter that was to accompany that submission. Please reply if you have any questions.

Regards,
David Burnstein

On 28 March 2013 17:11, Burnstein, David <david.burnstein@time4lime.com> wrote:
Good afternoon.

Please see attached response pertaining to the above subject matter. Signed original documents will be delivered to the ICTA offices.

Kindest Regards,

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From: Mark Connors
Sent: 04 April 2013 10:57
To: Burnstein, David
Subject: RE: LIME Response to ICTA and Digicel Interrogs (CD2012-1) - public copy

Categories: Green Category

Hi David

Thanks for sending that letter.

The letter lists the confidential and redacted files for the module, but doesn't list the other files that LIME submitted.

I think it would be very helpful to both the Authority and interested parties if, when submissions have multiple files, all files are listed in the covering letter so that both the Authority and the parties are aware of what LIME had intended to submit. This lets me know what files I should expect to see and also lets interested parties know what documents have been submitted.

Please provide to both the Authority and the interested parties a complete list of all files that LIME had intended to submit. In cases where a zipped/compressed file is used, the full list of files that the zipped was intended to contain should be provided rather than just the name of the zipped file.

Also the covering letter makes no mention any anticipated date for the outstanding questions. In order to keep both the Authority and interested parties properly informed, I think LIME should be identifying its intent on the record of the proceeding.

Given the above, LIME may want to send either an additional letter or an amended covering letter.

Please feel free to contact me if there are any questions.

Thanks

....mark

(345) 746-9620

From: Burnstein, David [<mailto:david.burnstein@time4lime.com>]
Sent: 04 April 2013 09:40
To: Mark Connors; Consultations; Anthony Ritch; Vandendries, Frans; David Burnstein; regulatory@lime.com; Chris.Hayman@digicelgroup.com; Raul.Nicholson-Coe@digicelgroup.com; Nadine.Ramsay@digicelgroup.com
Subject: Re: LIME Response to ICTA and Digicel Interrogs (CD2012-1) - public copy

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David Burnstein

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Kindest Regards,

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Our ref: GRCR/GR/15.19

28 March 2013

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: FTR and Transit Rate Proceeding – CD2012-1

Cable and Wireless (Cayman Islands) Limited, trading as LIME (“**LIME**”) is submitting the attached responses to the Authority’s and Digicel’s interrogatories on the above-noted subject.

Some of the company’s responses to the Authority’s interrogatories are being submitted in confidence, and redacted versions of the responses will be provided for the public record. Also attached are confidential revised versions of the fixed module, and relevant attachments. Redacted versions of the revised module will be provided for the public record.

The workbooks that comprise these models are set forth in the table below.

Confidential fixed FLLRIC model	Redacted fixed FLLRIC model
2013 03 28 CYM fixed - Conf.xls	2013 03 28 CYM fixed - Public.xls
Appendix III Fixed Assets Revaluation_20-09-09 Conf.xls	Appendix III Fixed Assets Revaluation_20-09-09 Public.xls
Appendix IV-FAC-TD Values 10_09_01_rev2 - Conf.xls	Appendix IV-FAC-TD Values 10_09_01_rev2 - Public.xls
Appendix V-TD LRIC Input_10_06_30	Appendix V-TD LRIC Input_10_06_30

Conf.xls	Public.xls
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LIME's responses to the Authority's interrogatories make reference to attached files. The file names of these attachments, along with a brief description of each file, are set forth in the table below.

File name	Description
Attachment - response to ICTA Interrog 1 (PSTN network diagram) CONFIDENTIAL.pdf	Diagram of LIME's PSTN national network
Attachment - response to ICTA Interrog 38 (fixed line growth) CONFIDENTIAL.xls	Fixed access line data submitted by LIME to ICTA in QMD report.
Attachment - response to ICTA Interrog 60c (Volumes to QMD reconcile) CONFIDENTIAL.xls	Reconciliation of data in fixed FLRRIC model to data submitted by LIME to ICTA in QMD report
Attachment - response to ICTA Interrog 60e 60g 60i (interconnection minutes reconciliation)_CONFIDENTIAL.xlsx	Reconciliation of data in fixed FLRRIC model to OLO interconnection services invocies
Attachment - response to ICTA Interrog 61 (broadband usage) CONFIDENTIAL.xlsx	Active broadband subs by speed, and average upload/download speed
Attachment - response to ICTA Interrog 62c (broadband detail) CONFIDENTIAL.xlsx	Active broadband data subscriber lists

Finally, certain of the Authority's interrogatories to LIME remain unanswered, and in its response to these interrogatories LIME indicates a complete answer will be forthcoming in two weeks. For clarification, LIME intends to submit responses to these outstanding questions on Friday, 12 April 2013.

Confidentiality Claim

Please note that some of the information in LIME's responses to the Authority's interrogatories and the attached confidential Fixed FLLRIC model is commercially sensitive information, and LIME requests that the Authority designate it as confidential pursuant to the *Information and Communications Technology Authority (Confidentiality) Regulations*. Disclosure of this information to the public would provide potential competitors with specific and direct information about LIME's revenues and costs, information which is consistently not disclosed to the public, and the disclosure of which could reasonably be expected to cause LIME financial harm.

The redacted version of the Fixed FLLRIC model has been prepared, in accordance with the Authority's "Disclosure Rule," meaning that a sensitivity analysis of each

specific cell identified as containing confidential information has been performed, and only those data found to have a trivial effect on either the cost of fixed termination or transit are redacted; all data found to have a non-trivial effect are disclosed. All redacted cells are highlighted in red, and the “dummy” numbers in them being within plus or minus 50% of the confidential value.

Yours faithfully,
Cable and Wireless (Cayman Islands) Limited, trading as LIME

Anthony Ritch
General Manager

c.c. Frans Vandendries, VP Legal and Regulatory Affairs
Rod Kirwan, Group General Counsel, LIME
CD2012-1 Distribution List