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Our ref: GRRCR/GR/15.19

06 May 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 confidential revised versions of the fixed model, and relevant attachments. This revised model incorporates the information provided by LIME in its responses to the ICTA’s and Digicel’s interrogatories, through Monday, 6 May 2013. Redacted versions of the revised model will be provided for the public record.

The workbooks that comprise confidential and public models are set forth in the table below.

Confidential fixed FLLRIC model	Redacted fixed FLLRIC model
2013 05 06 CYM fixed - Conf.xls	2013 05 06 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 Conf.xls	Appendix V-TD LRIC Input_10_06_30 Public.xls

Also attached is a copy of the voice mail platform invoice. While the Authority did not ask for documentation on this item, the relevant portion of cost assumptions tab (see section “NGN Direct Capex”) reflects the updated cost information in the attached invoice.

Furthermore, as indicated in our response to ICTA interrogatories 36, 49 and 62, there are certain changes to the model where LIME is awaiting further confirmation from the Authority on implementation of these adjustments. The changes are significant enough that we believe it would be prudent to have the Authority’s input at this stage. We understand that Authority’s view on these issues would not be final and would be without prejudice to the Authority taking a different position once it has reviewed the model carefully in its entirety. Its input at this stage would simply enable LIME to complete a full revision of the model.

Finally, with regard to ICTA interrogatory 52, we note that we proposed a change to the model to determine capacity for the national submarine route. We proposed that the formula should determine capacity in relation to busy hour demand in minutes along that route. However, the specification for the formula that we proposed on 19 April 2013 will not give that desired result. We believe that we capacity should be derived in a similar manner to how we are proposing to determine capacity to respond to interrogatories 49. Therefore, we await further confirmation from the Authority to our approach to interrogatory 52 as well.

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

David Burnstein
Regulatory Finance Manager

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