

June 9, 2003

Managing Director
Information and Communications Technology Authority
PO Box 2502 GT
Grand Cayman
Cayman Islands

Mr. Archbold:

After reviewing the draft Confidentiality Rules, 2002 we have the following comments:

1. In section 5(d) we see no good reason to publish or make public an applicant's claim for confidentiality. In describing why a document or any part thereof is considered confidential to the claiming party, it is "possible" that significant benefit could be derived by a competitive party in knowing that information.
2. In section 6(a) we consider that the draft rules should not give the ICTA the power to determine what is or is not likely to cause Specific Direct Harm to an applicant or to what degree Specific Direct Harm outweighs the public interest so as to place claimed confidential information in to the public record.

Instead, we suggest that before the ICTA makes public any claimed confidential information of any kind or the claim for confidentiality itself, the claimant, having already determined what they believe the Specific Direct Harm of disclosure to be, should be allowed to withdraw their application and claim and not have the ICTA disclose the information.

Respectfully,



James C. Knapp
Managing Director