



Our ref: GRCR/GR 15.20

28 April 2014

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

Dear Mr. Daykin,

Re: Interrogatories re New Service – Proposed Redaction

Further to the Authority's 17 April 2014 directive, LIME has attached its proposed redaction of the Authority's letter and interrogatories.

The marketing and product development plans of LIME is information that is of a commercially sensitive nature and is consistently treated in a confidential manner by LIME until implementation. In the event the information were to be treated otherwise, LIME's competitors and potential competitors would gain advance knowledge of LIME's marketing and pricing plans, even before the information could be made available to LIME's customers or to the general public. This would put LIME at a competitive disadvantage.

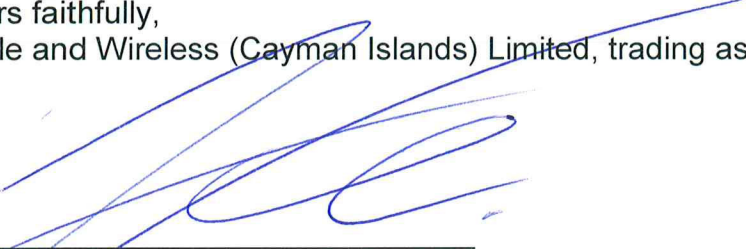
This is especially true in this case as other companies are already offering this service. Premature disclosure of the details of the service or of its associated SLA, the timing of its launch, or even the name of the service, would enable LIME's competitors to modify their offerings even before LIME could launch its own service, to LIME's financial and competitive detriment.

All confidential information in the Authority's letter is highlighted in grey. An abridged version of the Authority's letter is also attached for convenience, with the confidential information replaced by "###".

Please contact the undersigned directly should you have any questions.

Yours faithfully,

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



Frans Vandendries

Vice President, Legal, Regulatory & Corporate Affairs

c.c. Bill McCabe, Chief Executive Officer, LIME
Roderick Kirwan, Group General Counsel, LIME
David Cox, Head of Regulatory Affairs, LIME

Encl. (confidential and redacted)



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Information & Communications Technology Authority

Our ref: ICTA/140/161-09
Your ref: GRCR/GR 15.20

17 April 2014

Mr. Frans Vandendries
Vice President, Legal, Regulatory & Corporate Affairs
LIME/Cable and Wireless (Cayman Islands) Limited
PO Box 293
Grand Cayman KY1-1104
CAYMAN ISLANDS

*** * * C O N F I D E N T I A L * * ***

Dear Mr. Vandendries,

Re: Introduction of # # Service

On 8 April 2014, Cable and Wireless (Cayman Islands) Limited (trading as "LIME"), submitted a service filing for the introduction of a service called # #. In order for the Information and Communications Technology Authority (the "ICTA" or "Authority") to continue its review of the service filing, LIME is requested to reply to the following interrogatories.

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 along with the reasons for each confidentiality claim and the other requirements for confidentiality claims as specified in the *ICTA Law (Confidentiality) Regulations, 2003* (<http://www.icta.ky/docs/Regs/ICTA-%20Confidentiality%20Regulations.pdf>).

At this time, the Authority is providing this letter in confidence to LIME. However, in order to maintain a full public record, LIME is hereby directed by **28 April 2014** to either 1) indicate in writing to the Authority that it does not intend to make any confidentiality claim in relation to the content of this ICTA letter or 2) provide a redacted version of this letter to the Authority redacting the portions of the questions that it considers confidential and providing the reasons for each confidentiality claim and the other requirements for confidentiality claims as specified in the *ICTA Law (Confidentiality) Regulations, 2003*.

1. The second paragraph of the 8 April 2014 LIME letter states that #
specified in the wholesale price table in Attachment 1 to the cover letter, as well as #
specified in the retail price table in section 5 of the proposed
Tariff Pages, range # #. Please provide an explanation
as to why # # range in the cover letter is different from the
range specified in Attachment 1 to the cover letter and the range specified in
section 5 of the proposed Tariff Pages.
2. On page 3 of the Service Schedule (paragraph 8.3), it is specified that LIME
reserves the right to revise the SLA [Service Level Agreement] upon sixty (60)
days' advance written notice to [wholesale] customer.
 - a) Please provide the detailed rationale for LIMEs reserving the right to revise
the SLA upon sixty (60) days' advance written notice including a detailed
description of the type of changes LIME may make to the SLA under that
clause.
 - b) Please explain how this clause is consistent with the Annex 5 LIME Licence
requirement that, for Category 1 services, the changes to rates, terms, or
conditions can only be made with the prior written consent of the Authority.
3. On page 5 of the Service Schedule, it is specified that the [wholesale] customer is
responsible to provide a written request for a credit when it believes a service level
guarantee has not been met, and in order to receive the credit the customer must
comply with certain procedures specified by LIME, which, for example, require that

It appears that no such requirements
have been specified in the proposed Tariff Pages, wherein the retail customer
appears to be # #. Please provide an explanation

as to why LIME has proposed different treatment between the wholesale and retail customers in relation to #
#.

4. For the purpose of LIME's scheduled maintenance, it appears that LIME intends to notify the wholesale customer # (page 6 of the Service Schedule). However, the retail customer would be notified # (paragraph 21 of the proposed Tariff Pages). Please provide an explanation as to why LIME has proposed different treatment between the wholesale and retail customers in relation to #
#.
5. On page 7 of the Service Schedule, it is specified how LIME would calculate the 'Mean Time to Repair' for faults occurring on #
#. It therefore appears that the service provided to the wholesale customer could include #

#.

- a) Please clarify whether LIME intends to use #, as mentioned on page 7 of the Service Schedule, for the provision of #
#.
- b) Please provide a clarification, along with supporting documentation, whether there is any difference, in terms of network configuration and traffic routing, between the service provision to the wholesale customer and the service provision to the retail customer.

If you have any questions concerning the above interrogatories, please feel free to contact Vladimir Bulatovic at (345) 746-9612 or via email at vladimir.bulatovic@icta.ky.

Yours sincerely,

[signed]

Mark Connors
Head of Economics and Regulation