



www.lime.com

One Technology Square
19 Eastern Avenue
P.O. Box 293
Grand Cayman, KY1 - 1104
Cayman Islands.

P: +1 345 949 7800
F: +1 345 949 7646

Our ref: GRCR/15.20

18th September 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: New Bundled Service

LIME acknowledges the Authority's response and interrogatories dated 11th September, 2013, to our request for authorization to offer a new bundled service.

Pursuant to regulation 3 of the *Information and Communications Technology Authority (Confidentiality) Regulations*, LIME is requesting confidentiality with respect to certain elements of the interrogatories and submits herewith a confidential version (Attachment 1) and a redacted version (Attachment 2). All confidential information is replaced by "###".

The referenced sections of the interrogatories contain information that would allow LIME's competitors and potential competitors to 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. Specifically, they would permit competitors to know or determine the elements of the proposed bundle, which would then permit them to create their own alternative bundles in competition with LIME's, before LIME could launch its own into the marketplace. This would place LIME at a significant competitive disadvantage.

The marketing and product development plans of LIME are information that is of a commercial nature and is consistently treated in a confidential manner by LIME until they are implemented. Access to this information would enable competitors to develop competitive and targeted marketing and pricing responses, even before LIME would

be able to implement its own plans and could reasonably be expected to cause LIME financial harm.

Please do not hesitate to contact the undersigned should you need any further information.

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

'Signed'

Anthony Ritch
General Manager

c.c. Rod Kirwan, Group General Counsel, LIME
David Cox, Head of Regulatory Affairs, LIME

Encl.

Attachment 2

New Bundled Service Filing Interrogatories

Redacted

1. Proposed Tariff pages 8.15 and 8.16 indicate an "Issued Date" of 27 June 2013. Either provide an explanation of why that date is used or provide revised tariff pages showing the Issued Date as the date of the service filing.
2. Appendix 1 of the LIME letter dated 5 September 2013 seems to indicate that the bundle will contain services other than # # but the proposed tariff pages make no mention of those other services. The proposed tariff pages also do not contain the prices for the bundles. Provide revised proposed tariff pages that provide the full detailed rates, terms, and conditions for each of the proposed bundles that include # #. Those rates, terms, and conditions must be for the entire proposed bundles, not just one component of the proposed bundles.
3. In a 12 July 2013 letter to the Authority, LIME stated that #

#.
4. LIME's website (# _____ #) indicates that the #

#. However, the "Costs" section of the imputation test lists an # # cost line. Provide an explanation of how # # costs are relevant # # and provide the detailed calculations and methodology with all supporting documentation showing how the costs of the # # component were derived.
5. LIME's website lists the monthly prices for #

respectively. The # # costs used in the imputation test appear to be based on # #. Indicate whether or not the # # costs were determined in that manner and, if so, provide the basis on which LIME has assumed that these are the appropriate costs for what LIME has referred to as the # # component of the proposed bundles.
6. If LIME's # # costs were calculated based on #

#, provide the detailed

rates, terms, and conditions of #

#.

7. LIME's website indicates that the prices for #
. As these prices appear to be the basis of one of the calculations in the imputation test, provide the prices for those services that #
.
8. The "Costs" section of the imputation test lists a #
component. Provide a detailed service description of each of these components and provide the detailed calculations and methodology with all supporting documentation showing how the costs of those components were derived.
9. Identify which, if any, of #
components are included in any #
.
10. Provide the detailed calculations and methodology along with all supporting documentation showing how the cost of the #
was derived.