

Mark Connors

Subject: FW: Changes To Netspeak Service

Attachments: 2009_10_14_ICTA_NetSpeak_interrogatories (Confidential).doc;
2009_10_14_ICTA_NetSpeak_interrogatories (Redacted).doc

From: Woollard, Jayne [mailto:Jayne.Woollard@time4lime.com]

Sent: 25 March 2010 17:42

To: David Archbold; Mark Connors; Jasper Mikkelsen; David Laliberte; Ritch, Anthony; Vandendries, Frans

Subject: Changes To Netspeak Service

Dear Mr. Archbold,

Further to your letter of the 11th March 2010 thank you for the opportunity to provide a redaction to the Authority's questions which were sent to our office on the 14th October 2009. Please see the requested redaction below. The redacted sections are indicated by the insertion of ###.

We apologise for not responding to the October 14th questions and LIME appreciates that new filings would have to be made for any further requests to change NetSpeak Plans.

Please do not hesitate to contact me should you have any questions.

Kindest Regards,

<<2009_10_14_ICTA_NetSpeak_interrogatories (Confidential).doc>>

<<2009_10_14_ICTA_NetSpeak_interrogatories (Redacted).doc>>

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Information & Communications Technology Authority

***** REDACTED *****

Our ref: ICTA/140/161-09
Your ref: GRCR/GR 15.24

14 October 2009

Mr. Anthony Ritch
Country Manager
LIME/Cable and Wireless (Cayman Islands) Limited
PO Box 293
Grand Cayman KY1-1104
CAYMAN ISLANDS

Dear Mr. Ritch,

Re: Revision to the Residential NetSpeak Service

The Information and Communications Technology Authority (the "Authority") is continuing its assessment of the service filing that was submitted by Cable and Wireless (Cayman Islands) Limited ("LIME") on 5 October 2009.

In order to continue its review, the Authority requests LIME to provide responses to the following questions as soon as possible. When responding, please repeat the entire question above the corresponding response to each question.

In addition, 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.

1. The table on proposed Tariff page 6.24 indicates a per minute charge for outgoing calls to the "Rest of World (except Cuba and Other Countries)". Provide a detailed rationale of why the Tariff does not define "Other Countries" or provide a revised proposed Tariff Item that defines that term.
2. Note (a) to the "Usage for Outgoing Calls to" table on proposed Tariff page 6.25 defines the term "Continental Europe" but the term is not used in any other part of the proposed Tariff item. Provide a detailed rationale of why this definition is necessary or provide a revised Tariff Item that removes the definition.
3. Tariff Item 603.4.3) on proposed Tariff page 6.18 refers to 406.6(7). Identify the tariff page where this item is contained and explain the relevance to the NetSpeak Service or, if the reference is in error, provide a revised Tariff Item that corrects that reference.
4. Item 603.4.1.a) on proposed Tariff page 6.17 identifies that "[t]he LIME ### Basic Plan includes unlimited calls to ### fixed and mobile telephone numbers in the ### where ### operate." Identify whether a ### operates in ###. If so, provide a revised Tariff Item that makes it clear that unlimited calling to ### is not included in that plan.
5. Identify all inputs to the imputation test that rely on data contained in, or derived from, the FLLRIC model by providing, for each such input, a description and the specific Tab name and cell reference.
6. On page 4 of the Authority's 30 July 2009 letter concerning changes to LIME's NetSpeak service, the Authority stated that "the costs of accessing voicemail to retrieve message and the costs of the voicemail platform should be allocated to the voicemail products." As NetSpeak includes voicemail as a service component, identify how the costs of accessing voicemail to retrieve messages and the costs of the voicemail platform are included in the NetSpeak imputation test.

7. On page 3 of the Authority's 30 July 2009 letter concerning changes to LIME's NetSpeak service, the Authority stated that "pending the Authority's determination on the FLLRIC mode, the NetSpeak Service imputation test should continue to use the common cost percent and retail costs estimate from other recent service filings..." The common cost factor identified in the Authority's letter was ### applied to the NetSpeak total operating costs including terminating costs.

The total monthly operating costs per customer from the "###" imputation test sheet (the sum of cells D90:D97 divided by the number of customers) is ### per month. LIME estimates the common costs per customer per month to be ### (from cell D104) which is well below ### of ### (which would be ###). Similar results are seen in the "Unlimited US and Canada" and "Unlimited UK and W Europe" imputation test calculations

Provide a detailed explanation of, and justification for, how LIME has developed the common cost estimate. In addition, provide revised imputation tests that calculate the common costs as directed by the Authority.

Yours sincerely,

[signed]

Mark Connors
Head of Economics and Regulation