



**UPGRADE
CAYMAN**



26 May 2015

Dr. Russell Richardson
General Counsel and Deputy Director Industry Affairs
Information and Communications Technology Authority
PO Box 2502
3rd Floor Alissta Towers
Grand Cayman, KY1-1104

Dear Dr. Richardson,

Re: Introduction of New Service

Cable and Wireless (Cayman Islands) Limited, trading as LIME (“LIME”) is pleased to provide the following responses to the questions posed by the Authority in its letter of 22 April 2015 (your ref: ICTA/160/161-09) on the above subject.

Please do not hesitate to contact the undersigned if you should have any questions or require further information.

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

Bill McCabe
Chief Executive Officer

c.c. David A. Cox, Head of Regulatory Affairs, LIME

Encl.

LIME Responses to Authority Interrogatories

Re

Introduction of New Service

26 May 2015

1. An explanation, with supporting evidence, as to why the proposed Service should be treated differently from # # service since the Service is simply "#", as described in LIME's letter of 17 February 2015.

LIME Answer: In its 17 February 2015 filing, LIME submitted that the Service was a Category ### service. In its 9 April 2015 responses to the Authority's 27 February 2015 interrogatories, LIME submitted that the Service "# #". LIME went on to provide its views on why the Service # # ought to be less regulated, i.e. treated as a Category ### service.

For the avoidance of any doubt, LIME does not believe either service needs to be regulated by the Authority in order to protect consumers or competition, and that any level of regulation of these services is unnecessary, unreasonable and disproportionate. In fact, if the Service had not been subject to regulation by the Authority, LIME could have introduced it to the market and consumers could have been enjoying the benefits of better value some three months ago, as the Service clearly passes the imputation test and meets all other regulatory requirements.

However, as noted on 9 April 2015, LIME is willing to be subject to Category ### regulation for this Service, in order to be allowed by the Authority to bring it to market.

Some of the information in the answer above, specifically information which would identify the nature of the service, is being provided in confidence to the Authority pursuant to regulation 3 of the *Information and Communications Technology Authority (Confidentiality) Regulations, 2003*. It is information that is a trade secret which is treated consistently by LIME as confidential and which is not otherwise publicly available prior to launch of the Service. Its disclosure to the public and to LIME's competitors can reasonably be expected to cause LIME significant financial gain and to prejudice significantly LIME's competitive position. LIME notes that the information identifying the nature of the service is confidential only until launch of the service. A redacted version will be provided for the public record.

REDACTED

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2. Supporting documentation showing the “# #” as referenced by LIME in response to interrogatory 2.

LIME Answer: Copies of the notices sent to the relevant customers in confidence are attached.

Upon review of the attached notices, it appears that the # # was misstated. It should have been # # instead of # #. This has the effect of increasing the average rate by # # to # #, as detailed in the confidential table below.

ROW			###	###	###	Average
1	# # * Rate (USD)		###	###	###	
2	Exchange Rate		0.82	0.82	0.82	
3	Rate (KYD)	Row 1 * Row 2	###	###	###	
4	# # ** % of # #		###	###	###	
5	Average Rate	Sum of Row 3 * Row 4				###
	* #					#
	** #					#

However, the effect of this change on the imputation test is immaterial, and all plans of the Service continue to pass the test, as detailed in the confidential table below.

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Imputation Worksheet:

offers, LIME Cayman Islands

ROW	SERVICE	CALCULATION	#	#	#	#
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Service Characteristics

1	#		###	###	###	###
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Cost Characteristics

2	#		###	###	###	###
3	#		###	###	###	###

Costs per Month

4	Total imputed cost	Row 1 * Row 2 * Row 3	###	###	###	###
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Retail Price per Month

5	Retail price/month		###	###	###	###
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Test Results

6	Imputed Margin (\$)	Row 5 – Row 4	###	###	###	###
7	Imputed Margin (%)	Row 6 / Row 5	###	###	###	###
8	TEST RESULT (PASS/FAIL)	Row 6 >= 0 ?	PASS	PASS	PASS	PASS

The information in this answer relating to countries, customers, traffic and rates is being provided in confidence to the Authority pursuant to regulation 3 of the *Information and Communications Technology Authority (Confidentiality) Regulations, 2003*. It is information that is a trade secret and that is financial and commercial information which is treated consistently by LIME as confidential and which is not otherwise publicly available. Its disclosure to the public and to LIME's competitors can reasonably be expected to cause LIME significant financial gain and to prejudice significantly LIME's competitive position. A redacted version of this answer, but not of the attachments, will be provided for the public record.

REDACTED