

Our Ref: GRCR/ GR 15.4
19th April, 2004

Mr. David Archbold
Managing Director
Information Communications Technology Authority
P.O. Box 2502GT
3rd Floor Alissta Towers
Grand Cayman

Dear Mr. Archbold:

Re: C&W's bFree Anytime Rates

Further to our letter of 13 April 2004 regarding bFree Anytime Rates, Cable and Wireless (Cayman Islands) Limited ("C&W") submits the following attached Excel spreadsheet to demonstrate that the subscriber data provided to the Information and Communications Technology Authority ("Authority") in that letter are representative of the number of C&W's bFree Anytime customers. As indicated our 13 April letter, the figure of ### subscribers refers to subscribers actively using handsets. "Actively using handsets" in this context means that the subscriber has a positive credit balance registered to his or her numbers, as subscribers without a positive credit balance cannot use the service, i.e, generate minutes. Subscribers with positive credit balances are subject to the 25 cent charge per day drawdown. Subscribers with no balance are not subject to the charge.

We note that, because the number of subscribers with a positive balance continuously changes, some form of averaging must be used in any imputation test. In our 13 April 2004 letter, we used an unweighted average of the data from the month of February. In the data attached to this letter, we give day-to-day data for the first quarter of 2004, from 1 January to 31 March 2004.

The average monthly number of subscribers has increased from January, and the average is slightly higher in March than February. We believe, therefore, that the subscriber numbers submitted to you on 13 April 2004 are both appropriate and representative for consideration within the Authority's imputation test.

C&W requests confidential treatment of the subscriber data in this letter and the attached spreadsheet. This data is sensitive confidential commercial information consistently treated as confidential by C&W and not available from other sources.

Disclosure of this information would cause the company specific direct harm, as it would reveal to its competitors specific, detailed information about the number of customers on a specific pricing plan, and subscribership trends over time, which would enable C&W's competitors to develop more targeted marketing and pricing strategies to more effectively compete with C&W. A redacted version of the letter and the Excel spreadsheet is attached for the public record.

We hope to hear from you soon with respect to our 13 April 2004 request to review your 7 April 2004 conclusions with respect to C&W's bFree Anytime plan.

Yours sincerely,
Cable & Wireless (Cayman Islands) Limited

__["Signed"]_____
Rudy B. Ebanks
Vice President, Regulatory and Carrier Relations

Cc: Mr. Timothy Adam, C.E. Cable & Wireless (CI) Ltd.
Ms Lisa Agard, EVP, Legal Regulatory and Carrier Relations, Cable & Wireless
Mr. Frans Vandendries, Senior Regulatory Advisor