

December 24<sup>th</sup>, 2013



Mr. Glen Daykin  
Deputy Managing Director  
Information and Communication Technology Authority  
3<sup>rd</sup> Floor Alissta Towers  
P.O Box 2502  
Grand Cayman KY1-1104  
Cayman Islands

Dear Mr. Daykin,

**Re: LIME'S Misleading statements regarding their 4G LTE service.**

Digicel (Cayman) Ltd. ("Digicel") hereby notifies the Authority of a complaint with respect to Cable & Wireless (Cayman Islands) Ltd ("LIME") new services launch, where once again there is a comprehensive and flagrant disregard for any sense of accuracy regarding LIME's 4G LTE service launch. Please find in chronological order inaccurate marketing, interviews and press releases generated by LIME over the past 4 weeks.

In order to provide you with additional background information to support our complaint please find attached the most recent coverage map that was completed as a result of the driving testing which was conducted during the week of 8th December 2013.

**21st November 2013**

- Bill McCabe (CEO, LIME) holding and array of LTE handsets at a press event, even though he had prior knowledge to the fact LIME's 4G LTE network would not support voice or smartphones, as confirmed on the 2<sup>nd</sup> December in LIME's Galleria Store and social Media site.
- Press releases in both Cayman News Service and Caymanian Compass stating speeds of 40 to 70 Gbps. Clearly LIME's LTE network will only be capable of theoretical maximum download speeds of 40 to 70 Mbps only.
- Cayman 27 Article stating it will open a new era in communication, even though LIME had prior knowledge of the fact LIME will launch a 4G LTE network which does not support voice or smartphones, as confirmed on the 2<sup>nd</sup> December in LIME's Galleria Store and Social Media site.

**Mr. Glen Daykin**

**December 24<sup>th</sup> 2013**

**Re: LIME'S Misleading statements regarding their 4G LTE service.**

**Page 2 of 5**

**29<sup>th</sup> November 2013**

- LIME's Facebook states smartphones are not supported until February in direct conflict of their license obligation to bring advanced voice and data services to 70% of the Cayman Islands by 30<sup>th</sup> November 2013.
- LIME's Galleria Store stating that Prepaid service will not be available until May/June 2014 in direct conflict of the license obligation to bring advanced voice and data services to 70% of the Cayman Islands by 30<sup>th</sup> November 2013.
- LIME's Social Media site publish a pre-launch drive test of the Digicel's 1800MHz LTE Network coverage and compared it to a cartoon diagram of their own network. Misleading the market to the accuracy of network coverage area provided by both Service providers.

**6th December 2013**

- The press ad in the 6<sup>th</sup> December 2013 Caymanian Compass is not accurate as it doesn't show the actual network coverage of Digicel's network and will clearly mislead customers as well as the entire market. This is the same coverage map that was used in the ad submitted on 29<sup>th</sup> November 2013.
- The news release on Cayman News Service website is <http://cnsbusiness.com/content/lime-completes-4g-rollout>, is factually incorrect as it mentions transmission speeds that are not attainable given the spectrum band that is currently used by LIME and the LTE technology available today.

**23rd December 2013**

- The press ad in the 23<sup>rd</sup> December 2013 Caymanian Compass is not accurate as it doesn't show the actual network coverage of Digicel's network on the on the 23<sup>rd</sup> December and will clearly mislead customers as well as the entire market. Attached is a copy of the ad.

**POS Marketing statements**

1. As for the POS material the statements contained are also not accurate and should be amended immediately, below are examples of where Digicel has identified these inaccuracies:



**Mr. Glen Daykin**  
**December 24<sup>th</sup> 2013**

**Re: LIME'S Misleading statements regarding their 4G LTE service.**  
**Page 3 of 5**

- ***“The evolution is here, get your phones etc”***. even though LIME have full knowledge that their 4G LTE network which does not support voice or smartphones, as confirmed on the 2<sup>nd</sup> December in LIME's Galleria Store and social Media site.
- LIME will use the 700MHz spectrum, Digicel will use the 1800MHz band, which of course is factually incorrect as Digicel have both 1800 and 700MHz.
- 700 MHz is the preferred LTE frequency band in the USA, is an inaccurate statement, of the multitude of documents and articles relating to the AWS band would reveal, as an example

<http://www.fiercewireless.com/story/verizon-starts-deploying-lte-its-aws-spectrum/2013-10-15>

“Verizon has been seeding LTE devices into its lineup that can take advantage of 1700/2100 MHz AWS spectrum. Those airwaves are the same ones T-Mobile US (NYSE:TMUS) is using for its LTE network, which now covers 202 million POPs. **AWS is the most popular band for LTE in the Americas**, according to Tolaga Research.

- ***“You will need a phone that is LTE capable – the latest Smartphones are LTE ready etc.”*** even though LIME have full knowledge that their 4G LTE network which does not support voice or smartphones, as confirmed on the 29<sup>th</sup> Nov in LIME's Galleria Store and social Media site.

Digicel therefore asks the Authority to:

1. LIME ceases all misleading advertising for its LTE, or indeed any mobile network;
2. LIME publishes a retraction in the Caymanian Compass and also on Cayman27 of at least equal prominence and frequency to its misleading advertising to date. In particular LIME must publish a statement of apology that it coverage tested Digicel's LTE network prior to launch on the 28<sup>th</sup> November and subsequently on the 4<sup>th</sup>, 6<sup>th</sup> and 23<sup>rd</sup> December further tested Digicel's network on the 29<sup>th</sup> November during maintenance window, and with intent, published the results of that test in both Social Media and prominent advertising space in the Cayman Compass with the intent to mislead the public about the coverage of Digicel's LTE's network.




**Mr. Glen Daykin**  
**December 24<sup>th</sup> 2013**

**Re: LIME'S Misleading statements regarding their 4G LTE service.**  
**Page 4 of 5**

We underline that the misleading advertising will have already have led to some commercial damage to Digicel, and therefore merely stopping LIME from causing further damage would be insufficient. If LIME is not required to correct its misleading advert publicly that would encourage all parties to engage in similar tactics given that there are potential gains to be made and no downside consequences.

I enclose a cheque for the necessary fee in the amount of KYD\$750.00

Yours sincerely,  
**Digicel Cayman Ltd**

  
Chris Hayman  
Chief Executive Officer

Enc



Mr. Glen Daykin  
December 24<sup>th</sup> 2013  
Re: LIME'S Misleading statements regarding their 4G LTE service.  
Page 5 of 5



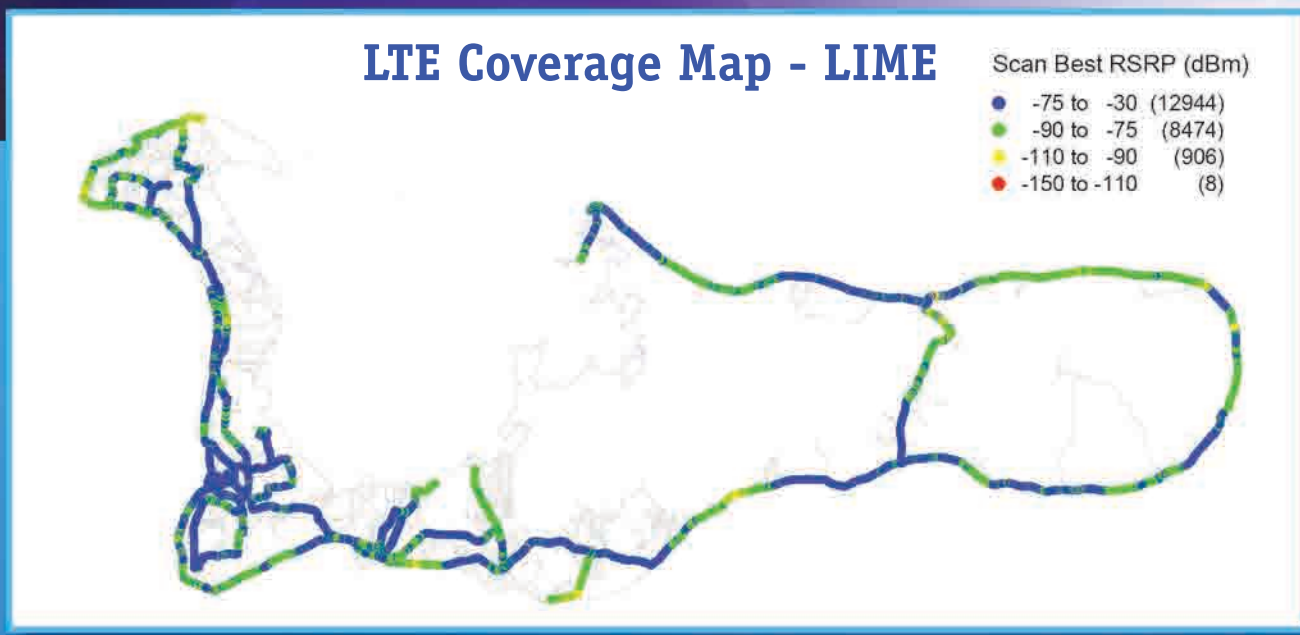
## LTE Quality

4 km

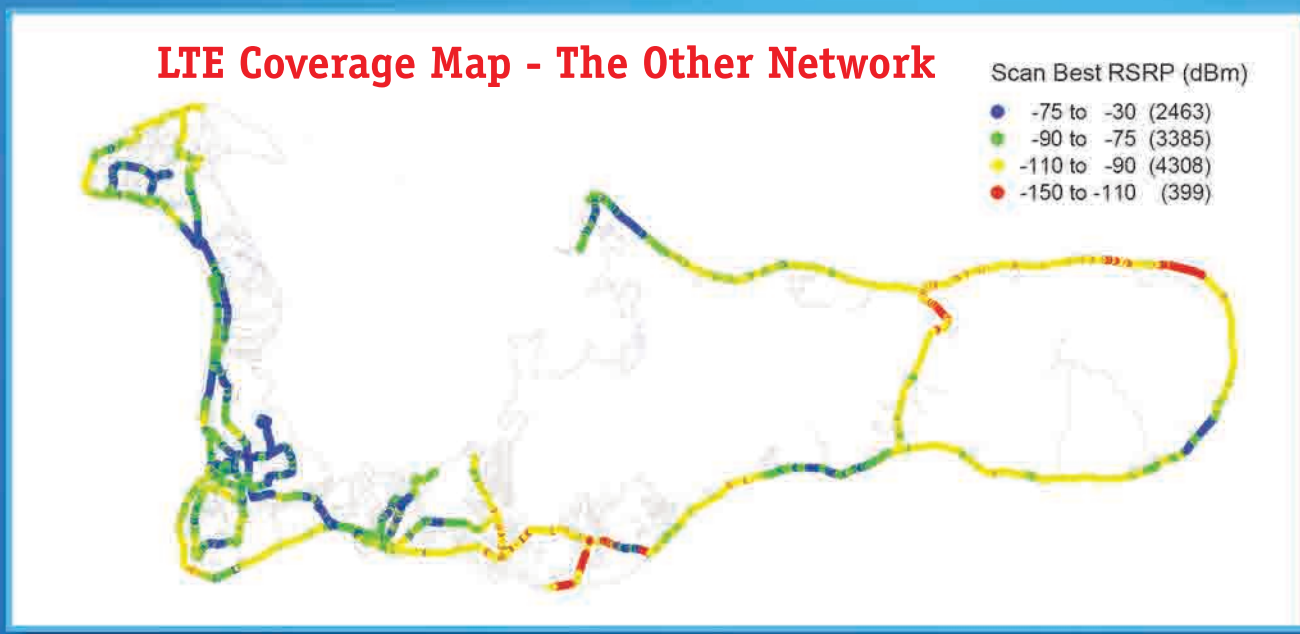


Digicel

# LIME has the BEST 4G LTE COVERAGE



**4G LTE  
Coverage  
is Blue...  
not Red!**



Blue	Excellent Coverage
Green	Good Coverage
Yellow	Weak Coverage, expect indoor issues
Red	No Coverage

**Only LIME brings you the true power of 4G LTE -  
Everywhere in Cayman!**



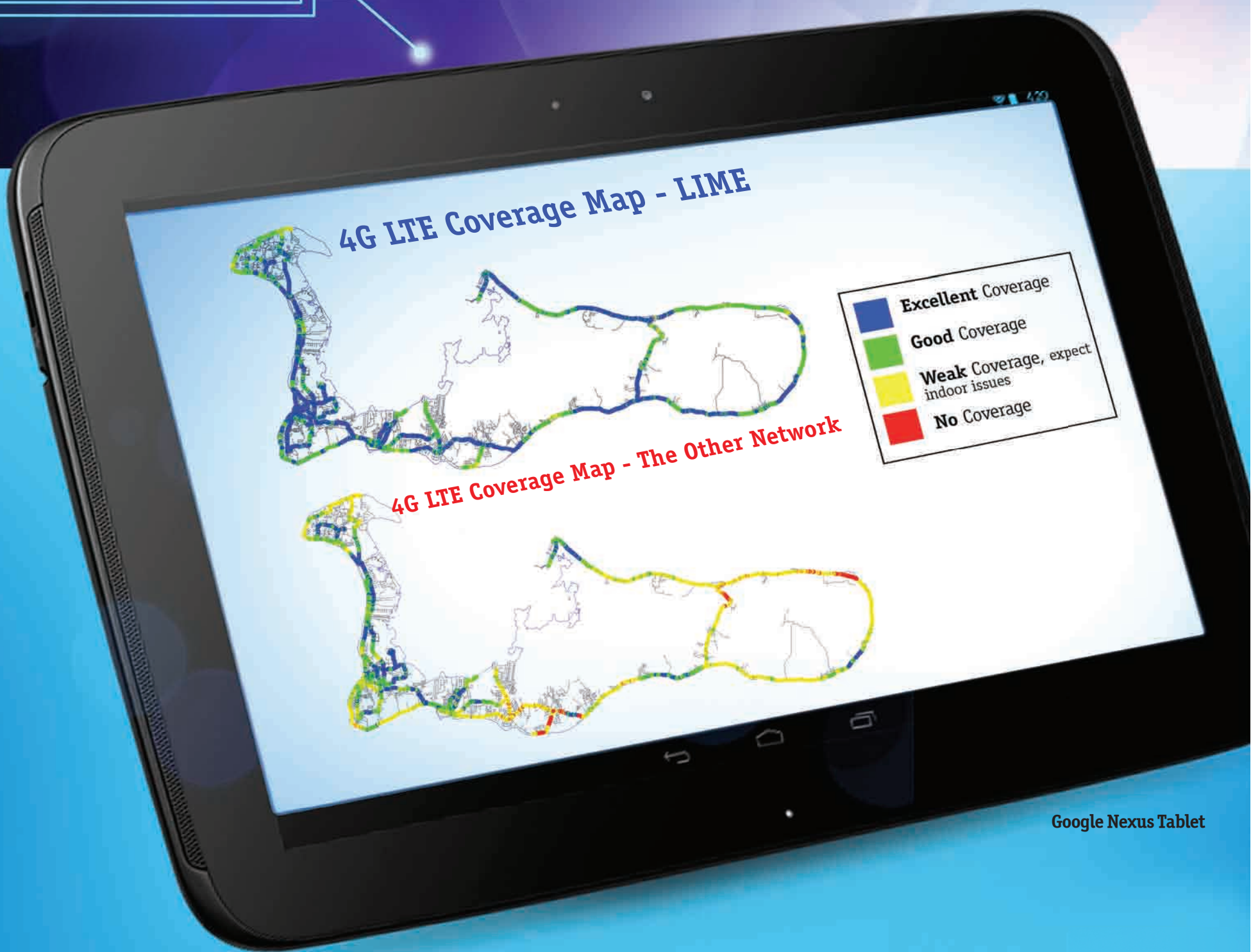
**Value Every Moment**



Visit [www.lime.com](http://www.lime.com) for more information. Coverage maps are a representation of LTE RSRP signal samples taken from 10 PM Friday November 29 to 2 AM Saturday November 30, 2013. In these maps: Blue (-75 to -30 dBm), Green (-90 to -75 dBm), Yellow (-110 to -90 dBm), Red (-150 to -110 dBm).

LIME has the

# BEST 4G LTE COVERAGE



Google Nexus Tablet

**FOR A LIMITED TIME**  
Get the Nexus Tablet!

From only  
**\$249**  
with a 24-month MyPlan\*

**DOUBLE DATA**  
for 6 months\*

Visit any LIME store today!



Value Every Moment

# LIME

\*LIME Terms and Conditions apply. Visit [www.lime.com](http://www.lime.com) for more information. LTE Coverage maps are a representation of LTE RSRP signal. In these maps: Blue (-75 to -30 dBm), Green (-90 to -75 dBm), Yellow (-110 to -90 dBm), Red (-150 to -110 dBm).



**DIGICEL CAYMAN LTD.**  
P.O. Box 700  
Grand Cayman KY1-1107, CAYMAN ISLANDS

VENDOR NUMBER	NAME	PAYMENT NUMBER	CHEQUE DATE				
OUR POSTED NUMBER	YOUR VOUCHER NUMBER	DATE	AMOUNT	AMOUNT PAID	DISCOUNT	WRITE OFF	NET
	12/24/201	CI\$ 750.00	CI\$ 750.00	\$ 0.00	\$ 0.00	CI\$ 750.00	

CI\$ 750.00 CI\$ 750.00 \$ 0.00 \$ 0.00 CI\$ 750.00



**DIGICEL CAYMAN LTD.**  
P.O. Box 700  
Grand Cayman KY1-1107, CAYMAN ISLANDS



064147

Butterfield Bank (Cayman) Limited  
P.O. Box 705, Grand Cayman KY1-1107, Cayman Islands

DATE	C.I. AMOUNT
12/24/2013	CI\$ 750.00

IN THE AMOUNT OF Seven Hundred Fifty CI Dollars And 00 Cents

PAYEE ICTA



*Maial L. King*  
AUTHORISED SIGNATURE  
*[Signature]*  
AUTHORISED SIGNATURE

⑈064147⑈ ⑆00000⑈ 250⑆ 02101035565⑈