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13th Dec. 2011

Victor Corcoran
Chief Executive Officer
Digicel Cayman Ltd.
PO Box 700
Grand Cayman KY1-1107

Dear Mr. Corcoran,

Re: Routing of Voice Calls in an LNP Environment

Thank you for your letter of Friday, 2 December 2011.

LIME considers it evident from the reports of the head of the Technical Committee of the meetings of that Committee on 28 January 2011 and 15 February 2011 that the Routing Numbers to be used in the Cayman Islands were agreed by all operators. It is also clear from the minutes of the 15 February 2011 meeting of the LNP Consortium that there was a consensus that the agreed Routing Numbers would identify the applicable networks. For convenience, the Routing Numbers are listed below.

| | |
|-----|------------------|
| 421 | LIME (Fixed) |
| 422 | LIME (Mobile) |
| 431 | Digicel (Fixed) |
| 432 | Digicel (Mobile) |
| 441 | TeleCayman |
| 451 | Logic |

It is also evident from the minutes of the 15 February 2011 meeting of the Technical Committee that there was a consensus on how the Routing Numbers ought to be used, in accordance with the applicable ITU Recommendations, including Recommendation Q.763.

Further, all Operators agreed that they would NOT send calls to the Donor Network of a ported number. This is summarized in the third “Technical and Operational Principle” in Schedule 4 (Business Rules and Port Order Processes) of the Number Portability Services Agreement, reproduced below:

3. Calls originating on their own networks/systems will not be routed to the Donor Operator of a ported number.

All Operators further agreed that simply handing the call over to a transit service provider was not sufficient to discharge that obligation to send the call only to the Recipient Operator. The first paragraph of section 3.5.3 of the same Schedule 4 specifies:

A centralised reference database will be implemented, with all Operators taking ‘local’ downloads of the routing data in order that all calls will be routed, in the first instance, directly from the originating network to the recipient network (via any applicable transit network). *(emphasis added)*

As the obligation to route calls correctly clearly and properly falls upon the originating operator, transit and terminating operators ought not to be required to determine whether any given call is properly routed. It follows that the originating operator has an obligation to let the transit and terminating operators know that the call has been properly routed. The only way this can be demonstrated is if the originating operator has done the “dip” and modified the signaling message accordingly, or if the originating operator buys a “dipping” service from another party. In LIME’s view, this remains that case whether or not networks are directly interconnected or interconnect via a transit operator.

Yours faithfully,

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

‘Signed’

Anthony Ritch
General Manager

c.c. David Archbold, Managing Director, Information and Communications Technology Authority
Mike Edenholtm, President, WestTel Ltd, t/a Logic
Greg Swann, President, Telecayman
Bob Kanner, COO, Telecayman