



**CABLE & WIRELESS**  
CAYMAN ISLANDS

Cable & Wireless (C.I.) Ltd.  
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Our ref: GR/GR/15.19  
20 December 2005

Mr. David Archbold,  
Managing Director,  
Information, Communication Technology Authority,  
P.O. Box 2502GT,  
3<sup>rd</sup> Floor Alissta Towers,  
Grand Cayman.

Dear Mr. Archbold:

We have received Digicel's letter dated 19 December regarding the draft costing manual that C&W submitted on 14 December. In that letter Digicel requests that C&W be required immediately to submit the LRIC models as they currently stand.

C&W believes that such a submission would be premature, the request is too broad, and it is not in keeping with the orderly and sensible sequence of development of the model as contemplated by CD 2005-1. Therefore the Authority should reject that request.

We emphasize that the purpose of this stage of the consultative process is to illustrate how the methodology - initially proposed by C&W, then possibly modified by the Authority after comment by interested parties - is to be implemented. This first stage will steer the development of the full model, and is achieved in the form of a draft manual. Consistent with this commonsense approach CD 2005-1 does not call for the construction of a model at this stage. Indeed, it would be counterproductive, confusing and wrong for C&W to further develop and/or release such a set of spreadsheets before interested parties have a chance to comment on the draft manual so that the manual can be put into its final form and in turn applied as intended to guide the development of the spreadsheets.

In any case, while C&W has accomplished a great deal to meet the requirements of this first stage of the consultative process outlined in CD 2005-1 FLLRIC Costing Manual, we have not yet built integrated LRIC models, which is a subsequent stage not contemplated by CD 2005-1 until sometime later. Therefore at this time, we do not yet have a set of spreadsheets that can be usefully reviewed by a third party.

Finally, we also note that the Authority has not yet indicated to what extent and how a model is to be shared among the interested parties, when such a model has been properly developed.

Please contact me regarding any questions you may have.

Yours faithfully,  
Cable & Wireless (Cayman Islands) Ltd.

“Signed”

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Rudy B. Ebanks  
Chief Regulatory and Carrier Relations Officer

c.c. Timothy Adam, Chief Executive C&W  
Ian Tibbetts, Chief Operating Officer C&W  
Frans Vandendries, VP Regulatory C&W  
John D. Buckley, CEO Digicel (Cayman) Ltd.