



CABLE & WIRELESS
CAYMAN ISLANDS

Cable & Wireless (C.I.) Ltd.
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Our Ref: GRCR/COMP 8.2
17th January, 2006

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

Dear Mr. Archbold:

Re: Digicel's request dated 16th January, 2006 – FLLRIC Cost Model

We refer to Digicel's letter of 16th January, 2006 to the ICTA. We were not surprised to see Digicel's request for a two week extension in the FLLRIC proceeding. As we tried to convey in our letter addressing Digicel's request for the model, we believed that distribution of the spreadsheets at this stage would be counterproductive and not in keeping with the orderly and sensible sequence of development of the model as contemplated by CD 2005-1.

Furthermore, allowing an extension on the grounds that Digicel has outlined will very likely lead to more delay later. This is because when C&W submits its revised complete model as it planned after receiving first comments from interested parties, Digicel may find cause to ask for more time.

We believe the process would be better served to maintain the original consultation timeframes, to request that parties focus on commenting on the draft manual at this stage and allow C&W to submit its model that will fully represent the "proof of concept" on the 6th.

That said, C&W would not be adverse to a couple of days extension, provided it would not disrupt the timeframes originally outlined, just as C&W's 8 December 2005 request of an extension had no impact on the deadlines of the rest of the proceeding.

Naturally, if the Authority were to grant the other interested parties a more significant extension, all the remaining submission dates will have to be adjusted.

Finally, we note that Digicel suggested that it has had a right to, and has been waiting for, the FLLRIC models since 21 December 2005. This is misleading. The fact is that Cable & Wireless was not required by the Consultation Document CD2005-1 to provide the Models to Digicel or any other party at this point in time, and that the Authority did not order Cable & Wireless to provide the Models until 4 January 2006. Cable & Wireless then provided them to Digicel within the deadline of 11 January 2006 mandated by the Authority. Cable & Wireless submits that it has complied with its obligations on a timely basis, and any imaginary delay on its part should not be a justification for delaying a determination in this important proceeding. Further, while Cable & Wireless requested on 8 December 2005 a two-day extension of the time to file the FLLRIC Costing Manual, this was clearly a de minimus extension that had no impact on any other deadline in the proceeding, and should not be compared with the two-week extension requested by Digicel."

Yours sincerely
Cable & Wireless (Cayman Islands) Limited

“Signed”

Rudy B. Ebanks
Chief Regulatory and Carrier Relations Officer

Cc: Mr. Timothy Adam, Chief Executive, Cable & Wireless
Mr. Ian Tibbetts, Chief Operating Officer, Cable & Wireless
Mr. Frans Vandendries, Vice President Regulatory Affairs, Cable & Wireless
Interested Parties in CD (2005) 1 (by email)