



CABLE & WIRELESS
CAYMAN ISLANDS

Cable & Wireless (C.I.) Ltd.
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Our ref: GR/CR/15.19
07 July 2006

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

Dear Mr. Archbold:

Re: ICTA Public Consultation on Costing Manual – CD (2005)-1: Comments on the 21 April submissions and 2 June interrogatory responses.

Pursuant to your letter of 8 February 2006 (ICTA/80/105/105-11) outlining the procedure for CD (2005)-1 proceeding, please find attached Cable and Wireless (Cayman Islands) Limited (“C&W”) comments on the 21 April submissions and 2 June interrogatory responses to the ICTA’s public consultation on the FLLRIC model.

Confidentiality Claim

Pursuant to Regulation 3 of the *Information and Communications Technology Authority (Confidentiality) Regulations, 2003* (“Regulations”), C&W hereby requests that some of the information in this submission be designated “confidential”. This information consists primarily of confidential and highly sensitive cost, vendor, network and volume information.

Further to Regulation 3(b), the information is commercial information, the details of which are treated consistently in a confidential manner by C&W and are not otherwise publicly available. C&W notes that this letter and contains detailed information on C&W costs, vendors, network and volumes, in highly disaggregated and granular form as well as commercial negotiations with other businesses. C&W treats such information as confidential, and does not release it to any persons other than those within the company who strictly need to know.

Further to Regulation 3(d)(i), disclosure of the cost, network, vendor and volume information in this submission can reasonably be expected to result in significant financial loss to C&W, and significant financial gain to its competitors, if it were disclosed to the public. Disclosure would enable them to develop competitive and targeted marketing and pricing strategies, designed to “cherry-pick” customers in Cayman. The result would be to C&W’s significant financial loss.

Further to Regulation 3(d)(ii), disclosure of the cost and billing information can reasonably be expected to prejudice the competitive position of C&W. C&W notes that disclosure of the information would provide to C&W's actual and potential competitors details of C&W's cost and revenue structure. C&W's competitors and potential competitors would use this information to create marketing strategies that would more effectively respond to C&W's marketing and pricing strategies, which would significantly impair C&W's competitive position in a highly competitive marketplace.

As noted above, the details of this submission and disclosure has been restricted to a limited number of key individuals in the company.

The confidential details in this submission relate to the market for various mobile and fixed services in the Cayman Islands. As the Authority is aware, that market is highly competitive, and disclosure of the confidential information in this submission would cause C&W specific direct harm. Because of the nature of the data, the extent of that harm is not limited by the currency of the information. Accordingly, C&W requests that the confidential information in this letter be treated as confidential on an on-going basis.

The public interest does not require disclosure of this confidential information (except to the Authority). As noted above, disclosure would significantly prejudice C&W. Further, disclosure to the public (other than the Authority) is not required, as the Authority is responsible for administering the imputation test under C&W's Licence.

Further to Regulation 4(1)(c) of the Regulations, C&W is submitting a redacted version to the other interest parties at the time of submission of the confidential version. All confidential information in this submission will be replaced by "##".

C&W herewith copies all interested parties.

Please contact me regarding any questions you may have.

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

"Signed"

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, Vice President Regulatory C&W
Interested Parties in CD (2005) - 1