



CABLE & WIRELESS

Cable & Wireless
(Cayman Islands) Limited

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Our ref: GRGR/GR 15.19
17 May 2007

Mr. David Archbold,
Managing Director,
Information and Communication Technology Authority,
3rd Floor Alissta Towers,
P.O. Box 2502GT,
Grand Cayman. KY1-1104

Dear Mr. Archbold:

**Re: Public Consultaion on Costing Manual – CD 2005-1 – ICTA/Telecordia
Second Round Interrogatory - Responses**

Please find attached responses to a portion of the interrogatories issued on 16 April 2007 (ICTA/80/105/105-11).

In filing this partial response we make reference to our 16 May 2007 letter requesting an extension and staggered filing of the responses and your email approval of 17 May 2007. For ease of reference 49 of the seventy interrogatories are being responded to today, twelve responses on 25 May, seven on June 1, and the final two on June 8. We attach below the schedule we are operating towards.

<i>Count</i>	<i>Interrogatory</i>	<i>Proposed date of Submission</i>	<i>Count</i>	<i>Interrogatory</i>	<i>Proposed date of Submission</i>
1	2.1.1	May 17	36	3.2.2	June 1
2	2.1.2	May 17	37	3.3.1	May 17
3	2.1.3	May 17	38	3.3.2	May 25
4	2.1.4	May 17	39	3.4.1	May 25
5	2.1.5	May 17	40	3.4.2	June 1
6	2.1.6	May 25	41	3.4.3	May 25
7	2.1.7	May 25	42	3.5.1	May 17
8	2.1.8	May 17	43	3.6.1	May 17



9	2.1.9	May 17	44	3.6.2	May 25
10	2.2.1	May 17	45	3.6.3	May 17
11	2.3.1	June 1	46	3.6.4	May 17
12	2.4.1	May 17	47	3.6.5	May 17
13	2.4.2	May 17	48	3.7.1	May 25
14	2.4.3	May 25	49	3.8.1	May 25
15	2.5.1	May 17	50	3.9.1	May 17
16	2.5.2	May 17	51	3.9.2	May 17
17	2.5.3	May 17	52	4.1.1	May 17
18	2.5.4	May 17	53	4.1.2	June 1
19	2.5.5	May 17	54	4.2.1	June 1
20	2.6.1	May 17	55	4.3.1	May 17
21	2.6.2	May 17	56	4.4.1	May 25
22	2.6.3	May 17	57	4.4.2	May 25
23	2.6.4	May 17	58	4.5.1	June 1
24	2.6.5	May 17	59	5.1.1	May 17
25	2.6.6	May 17	60	5.1.2	May 17
26	2.6.7	May 17	61	5.1.3	May 17
27	2.6.8	May 17	62	5.1.4	May 17
28	2.6.9	May 17	63	5.1.5	May 17
29	2.6.10	May 17	64	5.1.6	May 17
30	2.6.11	May 25	65	5.1.7	May 17
31	2.6.12	May 17	66	5.1.8	May 17
32	2.7.1	June 8	67	5.1.9	May 17
33	2.7.2	June 8	68	5.1.10	May 17
34	3.1.1	Already Submitted	69	5.1.11	May 17
35	3.2.1	June 1	70	5.1.12	May 17

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 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 information on C&W costs appears in highly disaggregated and granular form. 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 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.

Further to Regulation 3(d)(ii), disclosure of the cost 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 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.

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

cc: Timothy Adam, Chief Executive C&W
Ian Tibbetts, Chief Operating Officer C&W
Frans Vandendries, Vice President Regulatory Affairs C&W
Erik Whitlock, Regional Vice President Regulatory Finance C&W
Interested Parties in CD (2005) – 1