



CABLE & WIRELESS

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Our ref: GR CR/GR 15.19
08 June 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/Telcordia
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 were responded to on 17 May 2007 with a further twelve on 25 May and two on 01 June 2007.

As per our letter of 01 June, C&W had intended to submit responses to the five interrogatories which were awaiting further information from Telcordia and/or our vendor plus the final two responses today. While we are pleased to report that on Monday (04 June) we received the requested information from Telcordia, our vendor, despite all efforts from our end, has not been as forthcoming with the requested information. Due to previous commitments we have been given a turnaround time of 20 June by our vendor.

CONFIDENTIAL VERSION



Due to the delay in getting this information from our vendor, we have to once again apologise for the delay and the inconvenience caused, as we request a filing date of 22 June 2007 for these five responses. 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	Already Submitted	36	3.2.2	June 22
2	2.1.2	Already Submitted	37	3.3.1	Already Submitted
3	2.1.3	Already Submitted	38	3.3.2	Already Submitted
4	2.1.4	Already Submitted	39	3.4.1	Already Submitted
5	2.1.5	Already Submitted	40	3.4.2	Already Submitted
6	2.1.6	Already Submitted	41	3.4.3	Already Submitted
7	2.1.7	Already Submitted	42	3.5.1	Already Submitted
8	2.1.8	Already Submitted	43	3.6.1	Already Submitted
9	2.1.9	Already Submitted	44	3.6.2	Already Submitted
10	2.2.1	Already Submitted	45	3.6.3	Already Submitted
11	2.3.1	June 22	46	3.6.4	Already Submitted
12	2.4.1	Already Submitted	47	3.6.5	Already Submitted
13	2.4.2	Already Submitted	48	3.7.1	Already Submitted
14	2.4.3	Already Submitted	49	3.8.1	Already Submitted
15	2.5.1	Already Submitted	50	3.9.1	Already Submitted
16	2.5.2	Already Submitted	51	3.9.2	Already Submitted
17	2.5.3	Already Submitted	52	4.1.1	Already Submitted
18	2.5.4	Already Submitted	53	4.1.2	June 22
19	2.5.5	Already Submitted	54	4.2.1	Already Submitted
20	2.6.1	Already Submitted	55	4.3.1	Already Submitted
21	2.6.2	Already Submitted	56	4.4.1	Already Submitted
22	2.6.3	Already Submitted	57	4.4.2	Already Submitted
23	2.6.4	Already Submitted	58	4.5.1	June 22
24	2.6.5	Already Submitted	59	5.1.1	Already Submitted
25	2.6.6	Already Submitted	60	5.1.2	Already Submitted
26	2.6.7	Already Submitted	61	5.1.3	Already Submitted
27	2.6.8	Already Submitted	62	5.1.4	Already Submitted
28	2.6.9	Already Submitted	63	5.1.5	Already Submitted
29	2.6.10	Already Submitted	64	5.1.6	Already Submitted
30	2.6.11	Already Submitted	65	5.1.7	Already Submitted
31	2.6.12	Already Submitted	66	5.1.8	Already Submitted
32	2.7.1	June 8	67	5.1.9	Already Submitted
33	2.7.2	June 8	68	5.1.10	Already Submitted
34	3.1.1	Already Submitted	69	5.1.11	Already Submitted
35	3.2.1	June 22	70	5.1.12	Already Submitted

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