

Cable & Wireless (Cayman Islands) Limited

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Our ref: GRCR/GR 15.19 07 August 2007

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

Dear Mr. Archbold:

Re: <u>Public Consultaion on Costing Manual – CD 2005-1 – ICTA/Telcordia</u> <u>Third Round Interrogatory - Responses</u>

Please find attached responses to Third Round Interrogatories issued on 10 July 2007 (ICTA/80/105/105-11).

In filing these responses we make reference to our 30 July 2007 letter requesting an extension for filing of the responses and your email approval of 31 July 2007.

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 and vendor 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

