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# LIME

Our ref: GRGR/GR 15.19  
17 March 2009

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

Dear Mr. Archbold:

**Re: Public Consultation on FLLRIC Implementation (CD 2009-1)**

Cable and Wireless (Cayman Islands) Limited, t/a LIME ("**LIME**") is writing further to the above consultation document ("**CD 2009-1**"). In ICT Decision 2008-2, "Decision for the Costing Manual Consultation (CD (2005) 1)" (31 July 2008) (the "**Decision**"), the Authority directed LIME, *inter alia*, "to develop a costing module for a 3G network" (paragraph 75). LIME does not have a 3G network, a fact recognized by the Authority when it stated at paragraph 61 that there are currently no 3G networks in the Cayman Islands, and does not have the expertise in-house to develop a 3G model.

LIME has engaged an external consultant (Pricewaterhouse Coopers) to assist it, who estimated a minimum of 8 weeks would be required to develop the 3G model. However, that estimate was predicated on the revision of the current 2G model being completed (no small task, as the Authority is aware, as the "summary" of the Authority's directives takes up some 86 bullet points over six pages in the Decision). This has only now reached a point where the external consultant can begin its work on the 3G model. This means we anticipate that the 3G model will not likely be available before 18 May 2009.

We request, therefore, an extension of the time to produce the 3G model, from 6 April 2009 to Monday, 18 May 2009.

We expect to be able to file the other materials on 6 April 2009, as set out in CD 2009-1. Given that there are no 3G networks currently in operation, and given that the next deadline in the CD 2009-1 proceeding is 7 July 2009, we do not expect any parties to be materially disadvantaged by this delay.

LIME also advises the Authority that it will be submitting under separate cover an application for recovery of the costs of developing the 3G model, pursuant to paragraph 51 of Annex 5 of its ICT Licence.

Please do not hesitate to contact the undersigned if you should have any questions.

Sincerely,  
Cable & Wireless (Cayman Islands) Ltd. t/a LIME

'Signed'

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Darrel Rankine  
Vice President Regulatory Affairs

c.c. Anthony Ritch, Country Manager, LIME  
Donald Austin, EVP Legal Regulatory and Corporate Affairs, LIME  
Camile Facey, Vice President Legal, Regulatory and Corporate Affairs OFC, LIME  
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Interested Parties in CD (2009) - 1