

26th January 2012

Mr. David Archbold
Information Communications Technology Authority
P.O. Box 2502 GT
3rd Floor Alissta Towers
Grand Cayman

Regatta Office Park
Leeward One
1158A West Bay Road
PO Box 700
Grand Cayman KY1-1107
Cayman Islands
Tel: + 1 345 623 3444
Fax: + 1 345 623 3329

www.digicelcayman.com

Dear Mr Archbold

LNP Routing Numbers Dispute

Thank you for your email of 17th January about the above.

In its letter of 11th January LIME has made a number of claims about technical difficulties it will face if Digicel does not attach routing numbers to calls that it passes to LIME post implementation of number portability. These are clearly bogus since LIME has already made clear in its letter of 2nd December 2011 that it is able to handle calls even if they do not have routing numbers. Furthermore, LIME must also be able to handle inbound international calls without routing numbers in any event since otherwise it would not be able to terminate or transit international inbound calls. International calls represent a very significant proportion of LIME's total traffic. LIME is unable to force international carriers to insert routing numbers. Indeed the fact that this will always be the case, and as LIME was fully aware, means that the base case approach must be to adopt a system which does not rely on routing numbers. In the absence of agreement, and there was no agreement previously¹, the base case approach should be adopted.

The real issue appears to be that LIME seeks an additional financial return specifically on:

- a/ domestic calls which are
- b/ sent by local carriers and where
- c/ routing numbers are not attached.

Digicel is carrying out the necessary work on its side of the porting process by forwarding on to the transit operator (LIME) the calls which are bound for LIME's network or the network of third parties. LIME should then carry out the necessary lookup to determine the eventual destination of those calls. If LIME is saying that it will be unable to handle calls from Digicel alone then we can only imagine (given LIME's inherent ability to enable this as explained above) that it has either:

¹ The note of the 15th February 2011 Consortium meeting states that "For calls to mobiles, Logic and TeleCayman would pass the calls to LIME, who would do the dip and determine the prefix." and "Ultimately, the issue was not resolved."


- a/ decided to disable its ability to do so for domestic calls from other local operators that are not providing a Routing Number ;
- b/ has implemented a network configuration that enables it route domestic calls from other operators but not domestic calls from Digicel; and is
- c/ not applying the same rules for calls from their international interconnect partners for transit services to NXXs that terminate in the Cayman Islands

That is, in our view, an issue for LIME, and not for Digicel. In any case LIME should certainly have raised this matter with the operators prior to 2nd December 2011, and with the Authority long before 11th January 2012, if it had decided not to terminate domestic calls from Digicel in the absence of a Routing Number contrary to the terms of the existing interconnect agreement. It may be that LIME is using the impending 31st January portability deadline in a game of brinkmanship to see if there is a chance of obtaining unfair financial compensation from Digicel.

With respect to any suggestions that there could be an additional cost implication for LIME, and we contend that at most any such cost would be miniscule, we note that all operators obtain revenues from which they finance porting and the Authority permitted a recovery of up to \$0.85 in this respect². In the case of Digicel we must recover the cost from our mobile services alone. However, in the case of LIME, it benefits from double payment related to calls to ported mobile numbers: from both mobile termination and transit payments. LIME is already extremely well remunerated for the transit service it provides (way above cost by any measure) and there is no financial justification for it attempting to charge other operators additional amounts for checking its copy of the central database for the transit calls it receives.

We also feel compelled to mention that there would of course be no need to consider this matter if other operators on the island had agreed to interconnect with Digicel directly as requested of them some time ago. Direct interconnection would also have the advantage of avoiding transit costs and therefore promoting economic efficiency.

Yours sincerely



Victor Corcoran
CEO

² ICTA Decision 2008-5