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Our Ref: GRGR/GR/15.19

4 January 2013

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

Dear Mr. Archbold,

Re: Public Consultation on FTR and Transit Rate (CD2012-1): Disclosure Request

Pursuant to the Authority's procedures set out in the above noted disclosure determination (dated 13 December 2012), Cable and Wireless (Cayman Islands) Limited, trading as LIME ("LIME") is pleased to file its confidential and redacted fixed FLLRIC models.

The workbooks that comprise these models are set forth in the table below.

Confidential fixed FLLRIC model	Redacted fixed FLLRIC model
2013 01 04 CYM fixed - Conf.xls	2013 01 04 CYM fixed - Public.xls
Appendix III Fixed Assets Revaluation_20-09-09 Conf.xls	Appendix III Fixed Assets Revaluation_20-09-09 Public.xls
Appendix IV-FAC-TD Values 10_09_01_rev - Conf.xls	Appendix IV-FAC-TD Values 10_09_01_rev - Public.xls
Appendix V-TD LRIC Input_10_06_30 Conf.xls	Appendix V-TD LRIC Input_10_06_30 Public.xls

With regard to the Authority's "Disclosure Rule," LIME appreciates that there is a trade off in adopting such a rule, but is concerned it is imposed largely at LIME's expense. In particular, while the Authority indicates there is a cost-benefit trade off that should be assessed by comparing "the specific direct harm to the party providing the information [i.e., LIME] against the broader public interest in disclosing

the information” (p. 6), the Authority appears to consider only the interests of LIME’s competitors and discounts, if not ignores, the potential harms to LIME. By mandating a blanket disclosure of *all* LIME information that have “a non-trivial effect on either the cost of fixed termination or transit” the Authority is not giving proper consideration to the possibility that disclosure of these data to its competitors are the most costly to LIME and most harmful to LIME interests.

Confidentiality Claim

Please note that some of the information in the attached confidential Fixed FLLRIC model is commercially sensitive information, and LIME requests that the Authority designate it as confidential pursuant to the *Information and Communications Technology Authority (Confidentiality) Regulations*. Disclosure of this information to the public would provide potential competitors with specific and direct information about LIME’s revenues and costs, information which is consistently not disclosed to the public, and the disclosure of which could reasonably be expected to cause LIME financial harm.

The redacted version of the Fixed FLLRIC model has been prepared, in accordance with the Authority’s “Disclosure Rule,” meaning that a sensitivity analysis of each specific cell identified as containing confidential information has been performed, and only those data found to have a trivial effect on either the cost of fixed termination or transit are redacted; all data found to have a non-trivial effect are disclosed. All redacted cells are highlighted in red, and the “dummy” numbers in them being within plus or minus 50% of the confidential value.

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

Yours faithfully,
Cable and Wireless (Cayman Islands) Limited, trading as LIME

‘Signed’

Anthony Ritch
General Manager, LIME

c.c. Frans Vandendries, VP Legal and Regulatory Affairs
Rod Kirwan, Group General Counsel, LIME
CD2012-1 Distribution List