



May 9, 2013

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

Dear Mr. Archbold,

**RE: - FTR and Transit Rate (CD 2012-1): Answering Interrogatories**

Digicel (Cayman) Ltd ("Digicel") hereby requests that Cable and Wireless (Cayman Islands) Ltd ("LIME") should be required to answer the interrogatories submitted to it by Digicel on 12<sup>th</sup> February 2013 as a part of the FTR and Transit rate proceeding CD2012-1. For the most part, in LIME's reply, Digicel's questions have been responded to but not answered. Some responses attempt to deflect the question, some provide irrelevant responses, and some of the responses are simply incorrect. Below we list the relevant questions with our responses to LIME's responses.

1/ Is the cost of LIME's NGN soft switch already included in the mobile termination rate?

**LIME response:** *As required by the Authority's prior determinations, the FLLRIC model has separate modules for fixed and mobile networks, so as to model their costs on a stand-alone basis.*

**Digicel response:** *LIME should answer the question in order that it is possible to establish clearly what costs have been included.*

2/ Is the soft switch being used for sending traffic to the incumbent's fixed and mobile subscribers? If not, what would be necessary to enable it to handle traffic for both fixed and mobile traffic?

**LIME response:** *The ICTA's FLLRIC guidelines require separate cost models for the mobile and fixed networks.*

**Digicel response:** *an answer to this question will help to determine if packet or circuit switched format is being used or is possible with LIME's network which will affect costings. LIME should answer the question.*

3/ Does LIME's mobile switch have layered architecture or is it release 4 or above compliant?

**LIME response:** *This question is not relevant to this proceeding, the purpose of which is to model a forward-looking efficient fixed network, not mobile network.*

**Digicel response:** *this question is relevant as it will help to determine whether the switch is packet capable as opposed to enabling switched traffic only, and ultimately therefore speak to any costs of sending traffic to LIME's mobile subscribers. LIME should answer the question.*

4/ What proportion of the traffic using the NGN is Digicel mobile traffic?

**LIME response:** *This question cannot be answered as the FLLRIC model represents a forward-looking efficient operator, and not any individual licensee actually operating in the market.*

**Digicel response:** *Digicel's network has been modeled as LIME's opinion of an efficient operator therefore LIME must know what proportion of the traffic is attributed to Digicel/hypothetical operator and therefore what costs have been associated. LIME should answer the question.*

5/ What proportion of the total traffic handling capacity of the NGN is represented by Digicel's mobile traffic?

**LIME response:** *This question cannot be answered as the FLLRIC model represents a forward-looking efficient operator, and not any individual licensee actually operating in the market.*

**Digicel response:** *Digicel's network has been modeled as LIME's opinion of an efficient operator therefore LIME must know what proportion of the traffic handling capacity is attributed to Digicel/hypothetical operator and therefore what costs have been associated. LIME should answer the question.*



6/ Does the traffic destined for LIME's mobile network from Digicel pass through the NGN in one direction only?

**LIME response:** *This question cannot be answered as the FLLRIC model represents a forward-looking efficient operator, and not any individual licensee actually operating in the market.*

**Digicel response:** *LIME's response is unrelated to the question. LIME should answer the question as it will help to determine if Digicel/hypothetical operator traffic is being treated in a non-discriminatory fashion.*

7/ Which Codec is being used to send Digicel inbound traffic from the NGN to LIME's mobile switch?

**LIME response:** *This question is not relevant to this proceeding, as the identity of the codec used by a switch has no material if any impact on the costs associated with terminating voice calls on or transiting voice calls through that switch.*

**Digicel's response:** *the Codec is directly relevant as this speaks to how much traffic can be transported given certain levels of compression and therefore affects costs. LIME should answer the question.*

8/ Does the soft switch separate traffic for fixed and mobile subscribers and route them accordingly?

**LIME response:** *In accordance with the Authority's guidelines, the FLLRIC model is modeling a separate, stand-alone fixed network.*

**Digicel's response:** *LIME should answer the question as this helps to show if LIME is handling transport to its fixed network in the same or a different way from transport to its mobile network and once again this speaks to appropriate cost allocations.*

11/ What type of technology interface exists between the NGN and MSC? TDM or IP, Sigtran or low speed SS7?

**LIME response:** *This question is irrelevant to this proceeding. The specific type of technology interface between a fixed switch and a mobile switch has*



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*no material if any impact on the costs associated with terminating voice calls on or transiting voice calls through a fixed switch.*

**Digicel response:** *this question is directly relevant as it helps parties to see if packet or circuit switched technology is being used or is possible and this will affect costs. LIME should answer the question.*

Yours sincerely,  
**Digicel Cayman Ltd**



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Chris Hayman  
Chief Executive Officer

**cc: FTR and Transit proceeding distribution list**

