



Digicel

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Dear Dr. Bulatovic

FTR and Transit Rate (CD 2012-1) Proceeding: Digicel Response

Thank you for your email of 9th September 2014 inviting comments on this proceeding.

One Switch

In document "2014 07 31 LIME response to 2nd set of ICTA interrogs – Public" the Authority stated as part of interrogatory 45:

"Assuming that the Authority determines that a modern NGN network, designed with a bottom-up modelling approach, would require only one (1) main switching component to handle all the relevant communications in the Cayman Islands, LIME is requested to amend all the modelling assumptions in the Fixed Module, such as the number of sites specified in cells C17 and C23, and the relevant routing factors specified for the '400-PSTN Host Switch – call sensitive' (column E) and '400-PSTN Host Switch – duration sensitive' (column F) network components in the 'Routing Factors Input' sheet of the Fixed Module, in order to comply with the assumption that the number of main switching components has been reduced from two (2) to one (1)."

In response LIME has stated

"LIME response (31 July 2014): LIME strongly disagrees with such a requirement. Not only is the two-site approach actually used in the Cayman Islands, but any hypothetical modelling approach should require it for resiliency purposes. Having a national fixed network with a single central switching functionality would be ill-advised and highly unrealistic. We are unaware of any actual case or bottom-up fixed network modelling approach that effectively subjects the national fixed network to such failure risk."

It would appear that the ICTA is still considering this approach. We urge the ICTA to delay requesting LIME produce another model with a single point of failure until it has fully considered the matter. "

We would like to draw your attention to the fact, that when LIME were considering Mobile Termination Rates, LIME built in to its cost model for ECTEL countries the fact that LIME uses one mobile switch for all 5 ECTEL regulated countries (and in fact the single switch is used for Barbados also so it may have spread costs over 6 countries):

1. Barbados
2. Dominica (ECTEL)
3. Grenada (ECTEL)
4. At Kitts & Nevis (ECTEL)
5. St Lucia (ECTEL)
6. St Vincent & the Grenadines (ECTEL)

Hence, it is clear that cost savings clearly outweighed LIME's concerns about resiliency in the Eastern Caribbean.

Therefore, there is much less basis for LIME to argue that one switch (of any kind) cannot be used for the Cayman Islands alone, than there is to argue that one switch (of any kind) can be used for 6 countries. LIME should therefore be required to model costs for the Cayman Islands based on a single NGN switch.

We note that LIME also shares a mobile switch between the British Virgin Islands and Anguilla.

Yours sincerely



Chris Hayman
CEO

cc: FLLRIC list

