



29 May 2008

Mr. David Archbold
Managing Director
Information and Communications Technology Authority
Grand Cayman, Cayman Islands

Dear Sir,

Re: Public Consultation on Local Number Portability/Costs

With respect to the Authority's specific question as whether it is acceptable for subscribers to incur a monthly charge of no more than CI\$0.85 to provide them with the ability to transport their current phone numbers to another provider TeleCayman replies in the affirmative. TeleCayman submits that the acceptability of the CI\$0.85 maximum proposed price to subscribers needs to be assessed in the context of the various comments which follow.

Policy Considerations

Local Number Portability is extremely beneficial to two market sectors. Firstly, consumers are positively impacted as they can easily transfer their phone numbers to that service provider which best meets their needs in terms of services offered, price and ongoing support. Additionally, the ability of customers to transport their numbers encourages competition amongst service providers. Secondly, Local Number Portability is advantageous to new entrant service providers as it removes the very significant impediment raised by many customers for subscribing to their services to the effect that changing service provider will involve significant administrative costs.

Central Clearing House Costs

The Authority championed a multitude of discussions with potential vendors and TeleCayman submits that it is reasonable to conclude that central clearing house costs would be in the order of CI\$300,000 annually. TeleCayman accepts the Authority's view that, on a working telephone number basis, this amounts to CI\$0.20 per telephone number per month. TeleCayman looks forward to working with the industry and the Authority on the methodology for allocating this cost.

Internal LNP Costs Incurred by Each Licensee


TeleCayman supports the Authority's statement that the line item on a subscribers bill for "LNP Internal Cost Recovery" should be no more than CI\$0.65. Based on financial data provided by TeleCayman to the Authority it is anticipated that the Company will operate at or below this amount.

Porting Fee

In the event TeleCayman is one of those licensees which chooses to recover porting costs the suggested maximum fee of CI\$10.00 provided sufficient flexibility.

The above submissions are made in response to the Authority's Public Consultation on Local Number Portability CD 2008-1 issued on 21 April 2008. TeleCayman looks forward to working with the Authority and all other licensees to introduce Local Number Portability in the Cayman Islands.

Yours sincerely,


Andy Tybell
Business Solutions Manager
TeleCayman Ltd