



31 July 2015

Mr. Russell Richardson
General Counsel and Deputy Director Industry Affairs
Information and Communications Technology Authority
PO Box 2502
3rd Floor Alissta Towers
Grand Cayman, KY1-1104

Dear Mr. Richardson,

Re: Request for Pole-Related Information

Cable and Wireless (Cayman Islands) Limited, trading as LIME ("LIME") acknowledges receipt of your 26 June 2015 letter requesting information on LIME's use of Datalink Limited's pole attachment service. I apologize for the delay in answering.

With respect to the fees information requested in Table 1, LIME notes that the invoices we receive from Datalink do not present the information in the requested format. The confidential table included in Attachment 1 presents instead the three types of fees for which we have been invoiced.

With respect to the pole- and fibre-related questions in Table 2, LIME does not have the requested information because we do not track it in our systems. For example, while we track the number of poles to which we attach our infrastructure, we do not track separately those poles to which we attach fibre cables. We are working with Datalink to clarify this, but do not have the information at this time. Further, once we do have that information, we are unlikely to have historical information, i.e. it will represent current information only.

Similarly, we do not track the number of meters of fibre attached to Datalink poles, the number of meters of all fibre deployed by LIME, or the evolution of those numbers over time. While it is in theory possible to extract from our systems the number of meters of all fibre deployed, this would require a tedious process of consulting maps and manually measuring distances. Even this would result in an imprecise figure, and the degree of effort required to do this would be completely disproportionate to the limited value and accuracy of the result.

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Based on discussions with LIME employees, we estimate that #

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Some of the information in the answer above and in the attached table, specifically information relating to fees paid for Datalink's pole attachment service and to deployment of fibre infrastructure, is being provided in confidence to the Authority pursuant to Regulation 3 of the *Information and Communications Technology Authority (Confidentiality) Regulations, 2003*. It is information that is a trade secret which is treated consistently by LIME as confidential and which is not otherwise publicly available. Its disclosure to the public and to LIME's competitors would give them detailed information on LIME's infrastructure and cost base, and can reasonably be expected to cause LIME significant financial gain and to prejudice significantly LIME's competitive position. A redacted version will be provided for the public record.

Please do not hesitate to contact me if you should have any further questions.

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



Bill McCabe
Chief Executive Officer

Encl.

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ATTACHMENT 1

	Q1 2012	Q2 2012	Q3 2012	Q4 2012	Q1 2013	Q2 2013	Q3 2013	Q4 2013
###	###	###	###	###	###	###	###	###
###	###	###	###	###	###	###	###	###
###	###	###	###	###	8###	###	###	###

	Q1 2014	Q2 2014	Q3 2014	Q4 2014	Q1 2015			
###	###	###	3##	###	###			
###	###	###	###	###	###			
###	###	###	###	###	###			

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ATTACHMENT 2

	Q1 2012	Q2 2012	Q3 2012	Q4 2012	Q1 2013	Q2 2013	Q3 2013	Q4 2013
###	###	###	###	###	###	###	###	###

	Q1 2014	Q2 2014	Q3 2014	Q4 2014	Q1 2015		
###	###	###	###	###	###		

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