

# Digicel

## **Digicel's comments on the Public Consultation on Unbundling the Local Loop (Ref: CD 2013-1)**

**Redacted**

**15 July 2013**

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## **Introduction**

Thank you for inviting Digicel to provide its reply comments on this consultation. We should be pleased to answer any questions you may have with respect to our submission.

The introduction of local loop unbundling is a way of significantly accelerating broadband rollout in the Cayman Islands and enabling far more vigorous broadband competition. Existing communications licensees would be able to fit an unbundled access product in to their service portfolio ensuring that investment in communications networks and services is made both more effective and more efficient by utilising existing infrastructure where the economics require it. Consumers have the potential to benefit from multiple nationwide broadband service providers, more innovation, significantly lower prices and in the much closer future than would otherwise have been the case.

Further, evidence from elsewhere shows that local loop unbundling has been mandated widely and has proven to be the winning fixed network access product. In Europe, for example, it is many times more popular than other form of fixed access product and growing in use.

A/ What is your demand for fixed wire and/or fibre LLU? (When commenting on this question, please provide among other things your demand forecast particulars for the next five years, broken down by technology type, District and residential/business retail customers.)

	Customer Numbers				
	Year 1	Year 2	Year 3	Year 4	Year 5
<b>Broadband ADSL (FTTH or Copper)</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>George Town</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>West Bay</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Seven Mile Beach</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Bodden Town/Savannah/Spotts</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>East End</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>North Side</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Cayman Brac &amp; Little Cayman</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Corporate</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Consumer</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Total</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX

	<b>Customers of E1 Unbundled Loops (this is a separate group of customers from the above and would represent a form of circuit that can be connected directly to a customer PABX and multiplexed together as desired)</b>				
	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>
	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>George Town</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>West Bay</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Seven Mile Beach</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Bodden Town/Savannah/Spotts</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>East End</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>North Side</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Cayman Brac &amp; Little Cayman</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX
<b>Total Corporate</b>	XXXXX	XXXXX	XXXXX	XXXXX	XXXXX

**B/ Are the networks described at paragraphs 23 to 40 above sufficiently similar to be considered capable of providing voice and high-speed broadband access services to retail customers that are a real competitive alternative to each other?**

We think that that this question can be read in the context of not only what might theoretically be possible, but also:

1. what is likely to happen given physical and financial challenges involved in attempting the rollout of alternative networks; and
2. what customers demand.

Digicel has asked for unbundled loops because we are unable to compete fully across the whole of the telecommunications market in the Cayman Islands without that access. There are a number of reasons for that which we will address in turn.



## ***B1/ Efficient and Sustainable Investment***

Section 9(3)(h) of the ICTA Law states that one of the principal functions of Authority is to

*“to promote and maintain an efficient, economic and harmonised utilisation of ICT infrastructure;”*

Section 9(3)(a) states that another is to:

*“promote competition in the provision of ICT services and ICT networks where it is reasonable or necessary to do so;”*

In order to determine whether efficiency and economic considerations drive a need for LLU rather than expecting the completion of entirely new island wide fixed networks we can consider:

a/ the available revenues from the market for broadband Internet and TV services on the one hand, versus

b/ the amount of investment that would have to be made in alternative networks to attempt to compete for some of the broadband and TV market share (that sub-section of broadband and fixed line customers the market that may consider alternatives to fixed underground infrastructure).

Digicel estimates that the total annual revenue from broadband and TV provision is circa \$30m to \$35m per annum. We estimate this by using a figure of 19,325 broadband users paying a subscription price of around \$60 per month, and combining this with up to 15,602 subscribers paying around \$100 per month for TV. Not all of this revenue will be available for competitors as large businesses with business critical applications may demand an underground network and LIME (and Logic in a few areas) will be the only option for those customers unless LLU is mandated.

We have looked at the number of operators who are licensed and charged with rolling out fibre and other networks. A rough estimate of the cost of rolling out and running an overhead fibre network across the Cayman Islands might be around \$40m over 5 years (taking capital expenditure and operating expenditure in to account). Ongoing operating costs, maintenance and upgrades might amount to another \$4m per annum. Five operators in addition to LIME now appear to have national rollout commitments in their fibre network licences. This also

assumes that all fibre licensees attempting to compete with LIME can obtain infrastructure for overhead deployment of fibre and that is being disputed by the owner of the existing poles in the Cayman Islands. LIME's fixed copper network is already fully depreciated and perhaps LIME might spend US\$3m a year on installing fibre and maintaining its copper network. So in total over 10 years the total theoretical level of expenditure would have to be in excess of \$300,000,000 (or close to it based on recent consolidation). That is highly unlikely to be achieved.

In order to provide full competition for all customers a network other than LIME is currently faced with building an underground fibre network and associated very large civil works program. Digicel estimates that a new FTTH underground network for the Cayman Islands would cost in the region of US\$150m. That is not a viable proposition and is a non-starter in terms of a commercial option for any operator.

Further bringing in to question the an approach which attempts to encourage operators to invest in multiple fixed networks we hereby refer to the European Commission's June 2012 report on its 2011 Telecommunication Market and Regulatory Developments investigation which states that

*"...it is estimated that up to 80% of the costs of next generation network (NGN) deployment are related to civil works..."*

The cost of civil works alone demonstrates the barriers inherent in trying to provide a competing fixed infrastructure and by itself makes a very strong case for unbundling the fixed local loop. The alternative to unbundling is for potential competitors to run up huge amounts of debt replicating the necessary civil works. Replicating underground works is not a viable alternative and neither would be the creation of several overhead fixed infrastructures. It would not be the productive in our view for 80% of capital expenditure to be used to dig up roads and lay ducts or to lay fibre on poles, and moreover, necessarily thereby to force potential investors to front load those very large costs. The capital would be spent far more productively and efficiently on delivering services over existing infrastructure.

The inevitable conclusion based on the figures above is that the existing aggregated fibre rollout commitments and associated investment requirements are not sustainable.



Consolidation has already started<sup>1</sup> and further consolidation or business failure is likely. Going through this process in the Cayman Islands would be a painful exercise and waste large amounts of capital in inefficient investment that could otherwise have been used to provide nationwide competition much more rapidly and successfully by means of local loop unbundling. With a fit for purpose unbundled offering the existing fibre providers could combine their current fibre networks with local loop offerings to reach citizens throughout the Cayman Islands in relatively short order (and provide voice, broadband and TV). Consumers would then gain from the benefits of having at least two or three viable providers using underground copper/fibre competing against each other in the marketplace.

The alternative it appears to us is an excessive number of operators chasing too small a market. There is a significant risk in this case that there will be:

1/multiple (and not all viable) fibre construction in a few “hot spots” for traffic in the main conurbations as all operators try and win traffic from the larger business users and more densely populated areas; but,

2/ little, or relatively little, alternative fibre (and no alternative underground fibre at all) outside those hot spots for a long time to come as it is not viable for 5 other providers to roll out fibre even via an overhead solution across Grand Cayman and its sister islands.

Thus existing aggregate investments are already demonstrating an inefficient use of capital. That capital could be used much more effectively to invest in LLU competition. It would require vastly less investment and enable immediate competition for fixed line, broadband and perhaps TV across the Cayman Islands.

Indeed, LIME’s contrasting copper versus fibre broadband prices make a tremendous case for local loop unbundling. An examination of LIME’s Cayman Island wide ADSL (copper delivered) broadband services reveals that LIME is charging \$116 for 4 Mbps and \$130 for 8 Mbps. Plus LIME charges a \$60 activation fee and a \$60 installation fee. In contrast, LIME is charging significantly less for much faster speeds, only \$105 for 16Mbps and \$128 for 24Mbps on its new, and theoretically more expensive, fibre network (where available). In addition to which

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<sup>1</sup> In Q1 2013 TeleCayman (TBI Holdings) was sold to Logic Cayman (KeyTech holdings). Logic Cayman have publicly stated accounts and are also a loss making entity - currently losing US\$2M per annum in EBITDA.

those new fibre customers receive a free modem, free Installation, free LIME TV for 60 day and 50% off the first month's charges.

What is happening we believe is that LIME is charging more for lower speeds in areas where there is no fixed broadband competition. LIME is providing fibre services at lower prices only in the main conurbations where it may face some limited competition (albeit imperfect since a proportion of the high worth customers are not prepared to use overhead fibre). LLU would in contrast be able to bring competition more rapidly to all areas of the Cayman Islands.

These lower fibre costs are possible primarily because of the fact that the majority of civil networks required to lay an underground network across the Cayman Islands were undertaken in the long distant past during the period that C&W had a monopoly and have therefore been written off already. LIME therefore only needs to lay fibre down existing ducts and to carry out maintenance and incur some operating costs. Consequently its cost base is far lower than is faced by a new operator attempting to rollout a new fibre network. LIME could no doubt charge significantly less for ADSL/XDSL also but without LLU competition it will not do so as full competition cannot materialise in the near future due to the large barrier to entry resulting from the high upfront cost.

In this respect we should like to draw attention to comparative pricing in the Cayman Islands versus Bermuda. We have therefore looked at prices for 2, 4 and 8Mbps Internet services by LIME in the Cayman Islands versus prices offered by Digicel Bermuda (through its subsidiary Transact). On an unadjusted basis Digicel Bermuda's prices are on average less than a quarter of the price of those of LIME Cayman. Adjusting for GDP per capita differences<sup>2</sup> demonstrates that prices are less than a fifth of those in the Cayman Islands.

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<sup>2</sup> Leading economic journals such as The Economist suggest using prices adjusted for GDP per capita is a better comparator as this takes in to account labour costs.

	Not adjusted for GDP per capita				Adjusted for GDP per capita			
Internet Prices	LIME Cayman		Digicel Bermuda		LIME Cayman		Digicel Bermuda	
	Mbps	Price US\$	Mbps	Price US\$	Mbps	Price US\$	Mbps	Price US\$
	2	89	2	30	2	89	2	18
	4	140	4	40	4	140	4	25
	8	157	8	60	8	157	8	37
<b>Average</b>		129		43		129		27

This demonstrates that there is significant room for immediate improvement in terms of the prices for consumers in the Cayman Islands if a fit for purpose fixed access product is provided. Call prices are also significantly cheaper in Bermuda when GDP per capita is taken in to account and unbundled local loops in the Cayman Islands could enhance fixed voice line competition also.

### ***B2/ Market Dynamics***

The general market trend in telecommunications is towards the one stop shop full service provider. Customers are increasingly demanding the convenience and cost savings from dealing with a single entity which can meet all their needs within a single service contract. Moreover, the medium which can most easily cope with the high bandwidth demands of a combination of services is a fibre network. Thus a full service provider can reap the benefits of a virtuous circle where customers are attracted to a particular provider because it provides more than one service, and in contrast a single service provider faces the risk of a vicious circle because customers will move away from it because they can only obtain one service from it.

In mobile, for example, margins have been competed or regulated away significantly. There is an increasing possibility therefore that the original incumbents which have moved to become full service providers including mobile and fixed underground copper and fibre can start to take over an increasing proportion of the overall market place unless competition over their fixed networks is permitted. In other words a reversal of the past trend towards more competition is possible. Indeed the telecommunications market worldwide has demonstrated a significant

level of consolidation and is predicted widely to continue<sup>3</sup>. Fixed local loop competition can help to keep competition vigorous.

The European Commission's "Digital Agenda Scoreboard 2013" report demonstrates that local loop unbundling is the future in terms of a fixed line network access product. The report explains that:

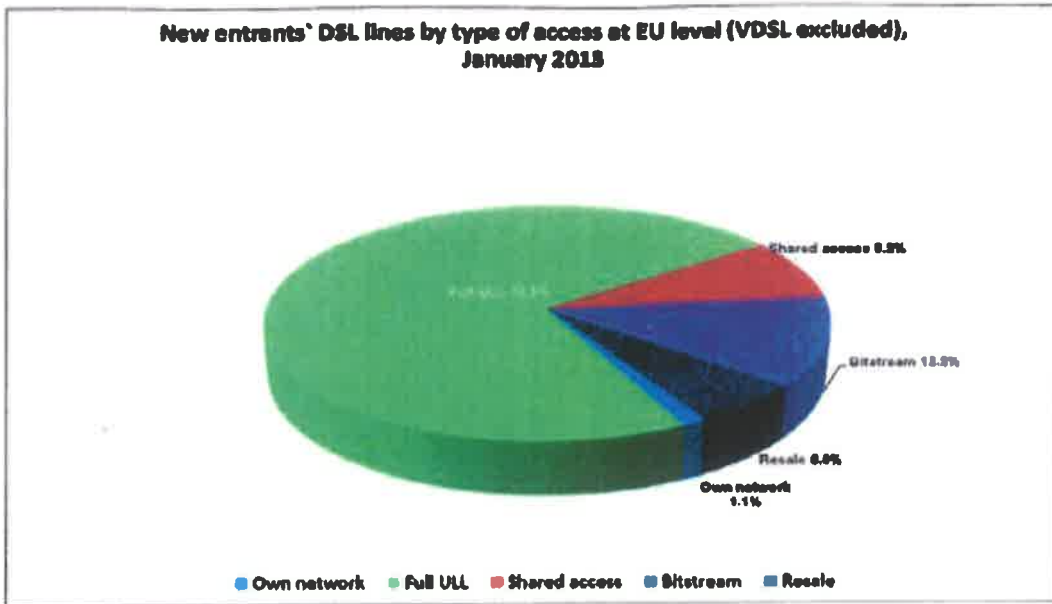
*"New entrants use local loop unbundling (fully unbundled lines and shared access) as the main option to access the incumbent network. There is a continuous migration towards full LLU, all other types of access to the incumbent network is going down."*

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<sup>3</sup> [http://www.booz.com/media/file/A\\_Dozen\\_Trends\\_in\\_Telecommunications.pdf](http://www.booz.com/media/file/A_Dozen_Trends_in_Telecommunications.pdf)

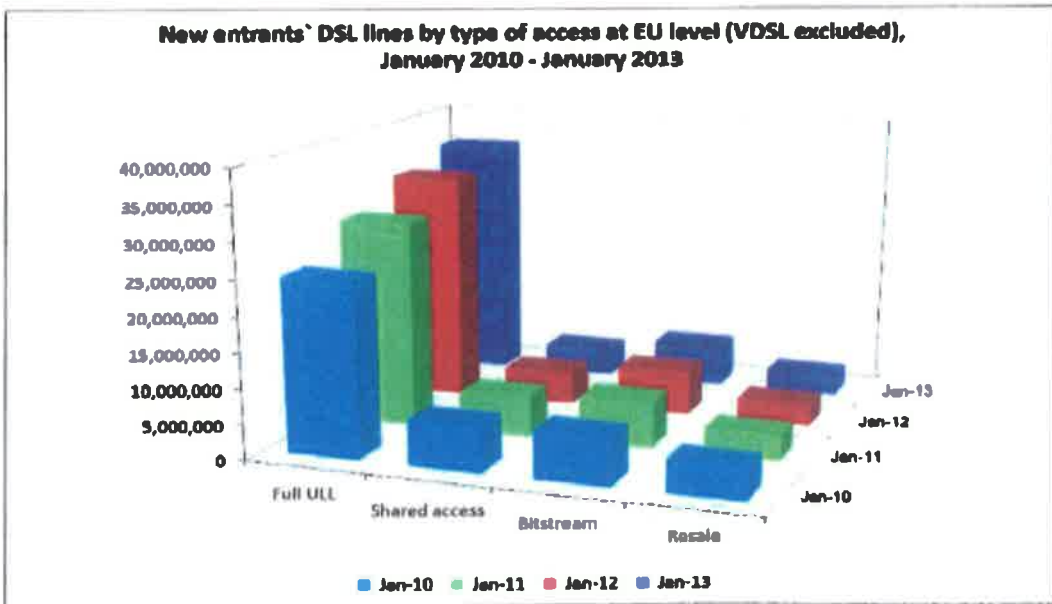
This can be seen from the graphs below:

**Figure 45: New entrants' DSL lines by type of access at EU level, January 2013**



*Source: Communications Committee*

**Figure 46: New entrants' DSL lines by type of access at EU level, 2010 - 2013**



*Source: Communications Committee*

This is significant as it demonstrates that LLU has proven to be the long term success in the market place. This is because LLU offers to competitors:

a/ the greatest flexibility in terms of what can be provided over the local loop including broadband and switched voice calls (in other words it helps to enable full service competition);

and

b/ the greatest possible margin (and greatest viability therefore) which are dependent to the minimum extent possible on the services of the incumbent operator.

The market is also increasingly moving towards a demand for Internet speeds sufficient to stream video and high definition video as well as web pages. This is because the vast majority of data is video – from sites such as YouTube. This is pushing the market towards a demand for very high speeds with low latency and no breakages in the stream (a very brief interruption in the delivery of web pages is not so critical, but even a tiny delay in a continual video stream can be unacceptable). Fixed networks are ideally suited for high speed delivery and low latency applications and for some applications have an inevitable advantage therefore. In particular it is generally perceived that fibre will for the foreseeable future be the way to provide the highest speed, lowest latency data stream at the lowest price (if it is not necessary to engage in civil works first).

### ***B3/ No Existing Detailed Terms and Conditions For Accessing Underground Facilities***

There is no regulated access to LIME's underground telecommunications facilities currently. While access could be requested it is not in LIME's commercial interests to permit this and we therefore anticipate that LIME would dispute such a request. Handling any dispute would probably take a considerable period of time. The Authority might also want to consult on a general right to access underground works as a result of any dispute. If the Authority was nonetheless minded to require access at some point it would no doubt then have to engage in an exercise to arrive at the price of access and availability of duct space as well as determining

other terms and conditions. That process could take a considerable amount of additional time and in any event too long to enable competitors to use LIME's civil works in the immediate term. Indeed we do not even know at this stage what if any space is available to do so since no independent survey has been undertaken. Therefore it is not an option in the immediate term for an operator to seek to lay its own fibre in LIME's ducts. Consequently regulated access via LLU is the way forward.

#### ***B4/ Timeframes***

As stated above we are clear that the current proposed number of fibre networks is not viable therefore there will be further consolidation or business failure or both if the only way forward is to require own network fibre build. We are not aware of any truly extensive competing fibre rollout in place that has been achieved thus far and even if a single Cayman Islands' wide fibre network in addition to LIME's were to prove viable, it will take several years to complete. In the meantime customers will not be able to benefit from a properly competitive broadband or fixed line calls market. Further, as indicated previously, overhead fibre is not an acceptable solution for a proportion of the market.

#### ***B5/ Speed/Capacity***

Both business and residential customers are demanding higher and higher Internet speeds with very low latency for video. The way of providing the highest speeds at the lowest price is the fixed line network. Although cellular Internet services are being used by customers who are on the move, fixed services are still the main way of delivering data up to the last few metres. Even in Internet cafes for example, although the final leg of the delivery path may be high frequency short range WiFi, the service is only viable in terms of speed and cost because it is delivered by a fixed network up until the last few metres. The same applies to residences – where available most customers have generally been using a fixed service up to a house and only then perhaps run it over a high frequency and very short range wireless router.

With respect to fixed wireless access when contrasted with LIME's ADSL services we can see that the fixed network gives LIME an advantage here too. LIME is able to offer its ADSL services

at a range of speeds which can be priced to meet specific customer groups – ranging from 1 to 8Mbps. Moreover the data speed is unregulated. WiMax in contrast provides one speed of 4Mbps, and in some instances has to be regulated to control for peer to peer data usage rates.

### **B6/ Cost**

Mobile networks have the ability to delivery relatively high data speeds but not as fast as a fixed service to the home and business and certainly nothing like as cheaply where there are existing civil works up to the premises. It is possible to deliver much more data over a depreciated (in terms of the civil works especially) fixed network at any given price compared to another network which therefore makes LLU vital as a way of opening up the market to competition.

### **B7/ The Demands of Customers**

Digicel has approached numerous business customers to see if they would be interested in some form of wireless Internet provision. A number of potential customers have indicated however that they will not move to wireless, or even to overhead fibre, for two major reasons:

a/ the vulnerability of overhead fibre to natural disasters and hurricanes in particular. Businesses frequently demand underground fixed wire (and ideally fibre) access to telecommunications services for business critical applications. This form of access is perceived as more robust in the face of natural disasters. Avoiding downtime is critical for businesses, especially banks for example, which are dealing with large financial transactions;

and,

b/ perceived security threats to exposed overhead fibre. Fixed underground networks are perceived as being more secure by some customers. The only acceptable delivery mechanism for these customers therefore is LIME's underground fixed wire or fibre network (or as near can be achieved to a fully underground network as possible), and Logic's network where it runs underground. This rules out for these customers any other form of network as an effective competitor.

The only way for other operators to compete for such customers is either to replicate an underground fixed network, or to obtain access to LIME's fixed network. Replicating an





underground fixed network is not economically feasible and would take many years to complete. Furthermore it would cause significant disruption in the Cayman Islands in terms of the need for example to dig up roads and conduct other civil works. The only practical way to compete is therefore via use of LIME's fixed underground network.

**C/ Do you agree with the benefits of mandating fixed wire and/or fibre LLU in the Cayman Islands as outlined at paragraphs 42 to 45 above? Can you quantify any of the benefits referred to? Are there any other benefits?**

Naturally, as the party that went to dispute with LIME with respect to its request for local loop unbundling, Digicel supports LLU. While we commenced that dispute based on copper wire unbundling alone, that is primarily because we were not aware of the ability of LIME's network to provide unbundled fibre. That was especially the case when we commenced the dispute back in early 2012. Furthermore, the technical path to enabling fibre unbundling was not as clear at that time given that it was towards the leading edge of technological development. We are therefore fully in support of mandating fibre unbundling also assuming that it is now technologically feasible in the Cayman Islands.

The benefits that would be derived from unbundling can be quantified in terms of two main components:

1/ Firstly, an improved service in terms of the price and/or quality. Simply in order to win customers from LIME competitors will probably aim to: a/ offer discounts of somewhere between 10 to 40% off LIME's retail pricing or more; or alternatively, b/ offer better levels of service. We would equate the value of the improved service necessary to win custom with the value of the discounted prices necessary to win custom. LIME is likely to react to the discounting by competitors to some degree. Perhaps by reducing its own prices by 10%. Consequently we would place the immediate level of benefits at least within the 10 to 20% range in terms of the current revenue enjoyed by LIME from its fixed copper and fibre voice and Internet offerings. We can estimate savings to consumers for Internet access: assuming 19,325 customers and an average \$60 package price and an average 15% reduction across the whole broadband market yields a benefit of about \$2.1 million per year. We do not have information on LIME's revenues with respect to voice calls but no doubt the Authority does and can

therefore instantly calculate what is of example 15% of that figure. With respect to the TV market a 15% reduction would result in a benefit of about \$2.8 million per year.

2/ Secondly, the impact of increased broadband penetration on the GDP of the Cayman Islands. Reduced prices will drive increased penetration of broadband. There are a number of studies in the public domain demonstrating that increased broadband penetration increases GDP. An econometric study done by the Inter-American Development Bank specifically for the Latin American and the Caribbean region estimated that a 10 percent rise in the market penetration of broadband services increased GDP by 3.2% on average<sup>4</sup>. Other studies have ranged from from that level down to just over 1%. Further, a report, conducted jointly by Ericsson, Arthur D. Little and Chalmers University of Technology in 33 OECD countries quantified the isolated impact of broadband speed. It demonstrated that doubling the broadband speed for an economy increases GDP by 0.3%. Competition through local loop unbundling will increase penetration, lower average prices and increase average speeds. Therefore assuming an overall 1.5% impact on GDP for an increase in penetration of 10% and some increase in overall speeds due to enhanced competition, GDP of about \$2.3 billion, and a 10% increase in broadband penetration within 12 months (over and above what would have occurred otherwise) would lead to an impact on GDP of about \$34.5m annually.

**D/ Do you agree with the costs of mandating fixed wire and/or fibre LLU in the Cayman Islands as outlined at paragraphs 46 to 49 above? Can you quantify any of the costs referred to? Are there any other costs?**

With respect to any concerns that mandating LLU could deter investment by LIME, we think this can be addressed by the terms on which access is granted and in particular the price. LIME has market dominance in terms of the retail market for broadband (especially the case where we separate the business market from the residential market) and fixed access is normally granted in such circumstances. Further LIME has control of facilities (its underground civil works) which are not practically replicable and without access to which there can be no competition for some if not all of the business market. There is plenty of benchmarking information on unbundled local loop pricing available. The monthly cost of a fully unbundled loop in the UK for example is

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<sup>4</sup> Garcia-Zaballos, A / Lopez-Rivas, R: Governmental control on socio-economic impact of broadband in LAC countries, working paper.

about 10 to 11 Cayman dollars<sup>5</sup> and further the UK regulator Ofcom has just proposed annual price declines of inflation minus up to 6%.

Generally, the cost of providing local loops seems likely to depend largely on maintenance and operational costs alone as most or all major expenditures on civil works and buildings is likely to have been undertaken in the long distant past. Further the costs will be more or less equivalent to other countries as the maintenance and operational costs will relate largely to a single fixed switch and the area served by that fixed switch. That would likely be the case for incumbents globally and therefore we believe that a carefully employed benchmarking policy is likely to provide a reasonable proxy of the costs of an unbundled local loop in the Cayman Islands. The population density of the Cayman Islands, shorter loop distances, and the flat topography might hold out the potential for lower than average LLU costs when compared to the situation internationally.

With respect to incentives to invest in new networks we addressed this above were we referred to efficient investment and viability.

**E/ Is mandating the provision of access to the fixed wire and/or fibre Local Loop in Grand Cayman and/or the Sister Islands contrary to the public interest?**

It is in the public interest to mandate access to the fixed wire and fibre local loop in Grand Cayman and the sister islands as without it:

- 1/ investment in the provision of broadband services will be not be efficient or effective
- 2/ it will take significantly longer for viable competition to take place across the whole of the Cayman Islands. In contrast local loop unbundling would enable that competition to take place much more rapidly;
- 3/ investment could be wasted in multiple fibre investments in a small proportion of the Cayman Islands with limited or no investment in outlying areas. The market is likely to undergo further consolidation or business failure as there is not a sufficiently large market to sustain the number of potential network players;

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<http://www.openreach.co.uk/orpg/home/products/pricing/loadProductPriceDetails.do?data=totid5BwFmkf9vLcBITRyZF9loRxWibIKK6V7YWmlYAIMnGHsqdC0vzO163bJmh34D91D7M0q8u%2F%0AIIStlFAKw%3D%3D>

4/ there will be no effective competition for at least a proportion of the customer base which demand underground networks for provision of services.

**F/ Does any Licensee see any demand for fixed wire and/or fibre LLU in the Sister Islands if the Authority determines that fixed wire and/or fibre LLU should be mandated there but not in Grand Cayman?**

Yes, and we have above provided forecasted demand requirements in that respect.

**G/ Are there any other issues that the Authority should take into account as part of this consultation?**

At the indicative monthly benchmark price Digicel has provided of around 10 to 11 dollars (and presuming that set up prices are also reasonable) LLU will be viable in the Sister Islands as well as in Grand Cayman.