

(b) Broadband (b) Telephone (b) Data (b) Professional Services

Information & Communications Technology Authority PO Box 2502GT Grand Cayman **Cayman Islands**

11 September 2008

This letter is in response to the ICTA request for comments found in CD 2008-1. This letter will not review the merits of LNP to the community and industry as this has been previously determined in CD 2005-1. The current question is whether the cost of LNP implementation and management is justified considering the maximum costs set within CD 2008-1. Specifically, the request was to comment on the following questions:

- a. Given the maximum cost recoveries detailed above, are you in favour of number portability being mandated in the Cayman Islands? (It should be noted that whilst the Authority can specify the maximum amount that can be directly attributable to LNP on monthly telephone bills, licensees could choose to recover their costs in other ways e.g. by not reducing their calling charges as quickly as they otherwise might.)
- b. Are the maximum monthly charges acceptable?
- c. Is the one-time porting charge acceptable?

Based on the information provided within CD 2008-1, WestTel is of the opinion that the costs of Local Number Portability outweigh the likely financial benefit.



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CD 2008-1 lacks significant detail concerning cost sharing, project timelines, proposed regulations, and solution selection. Without these details, the WestTel opinion was formed based on a worst case scenario.

WestTel would welcome and encourage the ICTA to submit for public comment a proposal that includes these additional details.

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Michael Edenholm Chief Executive Officer