

CABLE & WIRELESS

Our Ref: GR CR GR 15.4
23 November 2004


Mr. David Archbold
Managing Director
Information and Communications Technology Authority
P.O. Box 2502GT
3rd Floor Alissta Towers
Grand Cayman.

Dear Mr. Archbold,

Re: ICTA FLLRIC Public Consultation – CD (2004) 1

Cable & Wireless (Cayman Islands) Ltd. is pleased to provide the ICT Authority with our *Phase 1: Response to Intervenors*. The original filing date for this submission was 17 September 2004. However, the incidence of Hurricane Ivan and the absence of a new schedule for this proceeding have delayed our response by roughly two months. In an effort to move the proceeding forward we are submitting our Phase 1 response in anticipation of an amended schedule. While the Authority has not yet indicated a new schedule for the FLLRIC proceeding, we propose the following, based on moving every date back two months:

Objective	Specific Action	Date
Phase 1: Establish Model Foundation	The Authority issues first consultation document.	May 24, 2004
	Parties to indicate to the Authority whether they will be asking questions of C&W (i.e., issuing interrogatories) on its 10 November 2003 FLLRIC proposal.	June 7, 2004
	Interested parties to issue interrogatories to C&W.	June 21, 2004
	C&W to file responses to interrogatories.	July 30, 2004
	Parties to file comments.	August 20, 2004 September 3, 2004

Objective	Specific Action	Date
	C&W to file comments.	September 3, 2004 September 17, 2004 November 22, 2004
	The Authority to issue preliminary determination setting out overall model principles and assumptions and identifying further process.	November 2004 January 2005
Phase 2: Evaluate Preliminary Model Implementation	<p>The Authority to issue second consultation. Among other things, it is contemplated that C&W would be requested to file draft costing manual, key cost assumptions, and potentially some preliminary cost study results, implementing principles and assumptions in the Authority's Phase 1 preliminary determination.</p> <p>Further process to consist of the following:</p> <ul style="list-style-type: none"> - Opportunity for interested parties to issue interrogatories to C&W. - C&W to file responses to interrogatories. - All parties to file comments, evaluating and critiquing application of principles and assumptions in first determination. - C&W to file reply comments/revised results incorporating parties' comments. <p>The Authority to issue second determination identifying FLLRIC model principles, assumptions and implementation.</p>	November 2004 January 2005  September 2005 November 2005
Phase 3: Final Implementation and Application	C&W to file, among other things, final costing manual and key cost assumptions.	January 2006 March 2006

Yours faithfully,
Cable & Wireless (Cayman Islands) Ltd.

"Signed"
Rudy B. Ebanks
Chief Regulatory and Carrier Relations Officer

cc: Timothy Adam, General Manager C&W
Ian Tibbetts, Chief Operating Officer C&W
Lisa Agard, EVP Legal, Regulatory and Public Policy C&W
Frans Vandendries, Senior Regulatory Advisor C&W
Jaime D'Almeida, Regulatory & Economics Policy Manager C&W