



PO Box 10189  
Grand Cayman KY1-1002  
Cayman  
Islands  
Tel: (345) 946-4282  
Fax: (345) 945-8284

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Utility Regulation and Competition Office

## BY EMAIL

12 October 2022

Ms. Susanna O'Sullivan,  
VP Northern Cluster,  
Cable and Wireless (Cayman Islands) Limited ('**Flow**')

Mr. Jonathan Martin  
Manager  
DataLink, Ltd. ('**DataLink**')

Ms. Diane McAuliffe  
Chief Executive Officer  
Digicel Cayman Limited ('**Digicel**')

Mr. Randy Merren  
Managing Director  
Infinity Broadband, Ltd. ('**C3**')

Ms. Siobhan James-Alexander  
Chief Executive Officer  
WestTel Limited ('**Logic**')

(Each a '**Licensee**' and collectively referred to as '**the Parties**')

Dear Parties,

### Re: ICT Consultation 2016-2 – RFIs and Next Steps

1. On 22 September 2022, the Office notified the Parties that the Office had recommenced work on ICT Consultation 2016-2 Part B and Part C ('**Consultation 2016-2**').

#### Existing Record

2. The Office notes that submissions and responses to Requests for Information ('**RFIs**') were last filed in the proceeding in 2017 (see Attachment 1) and considers that the record of that proceeding needs to be brought up to date. RFIs for that purpose are included in Attachment 2 to this letter.

#### Other Matters

3. The Office further notes that access to the communications space on CUC utility poles appears to continue to be the subject of some controversy among the Parties. For

example, the Office received a Dispute Determination Request ('DDR') from C3 in 2017 regarding make-ready work allegedly paid for but not used within the period set out in the applicable pole sharing agreement, and another from Logic in 2021 raising questions about timely and equitable access to utility poles managed by DataLink. Both DDRs raised questions regarding whether certain of DataLink's practices or procedures regarding make-ready may have the effect of limiting efficient and harmonized use of pole infrastructure or of limiting the promotion of competition in the provision of ICT services or ICT networks.

4. While the Office declined to determine the C3 DDR on procedural grounds, C3's submissions nevertheless highlighted the following questions:
  - a) Certain rights and obligations of attachers are connected to the issuance of a permit to attach.<sup>1</sup> In order to ensure the rights and obligations of the parties to a pole sharing agreement are clear, what is the appropriate process for the issuance of a permit, including when should a permit be considered to be issued such that an attacher is authorized to attach its communications facilities to its assigned spot in the communications space on the pole, and what form should that permit take?
5. In addition to certain matters already under consideration in Consultation 2016-2, Logic's submissions raised the following additional relevant matters:
  - a) Should a permit to attach be limited to the specific type of communications equipment specified therein, or should it be deemed to allow other communications facilities the attacher may choose to attach in the future? What are the relevant considerations that should be taken into account when addressing this question?
  - b) When should an existing pole which cannot accommodate up to four attachers be replaced by one which can? What are the appropriate events which should trigger such an event? Should replacement of existing communications facilities with new communications facilities ("swaps") which do not require strengthening of the pole or other modifications to the pole be considered to be such a triggering event?
  - c) Should DataLink's make-ready processes include a reimbursement process, such that an attacher who benefits from make-ready paid for by another attacher compensates that other attacher? If yes, what are the appropriate terms, conditions and limitations of such a reimbursement process?
6. As these additional issues may be relevant to those being considered under Part B and Part C of Consultation 2016-2, it would be expedient to address those practices and procedures at the same time as other permit application review and make-ready processes are considered. The Office therefore considers that these matters should be added to those under consideration in the Consultation 2016-2 proceeding.

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<sup>1</sup> For example, right to attach communications facilities to utility poles, obligation to attach within a specified period of time, obligation to pay pole attachment fees, etc.

## **Procedures**

7. In light of the time that has elapsed since submissions and responses to RFIs were last filed in Consultation 2016-2, and in light of the additional issues identified above, the Office intends to adopt the following procedure for Consultation 2016-2:
- a) The Office invites the Parties to provide additional comments or submissions, including any supporting documentary evidence, on any of the matters raised in Consultation 2016-2, with a particular focus on relevant changes in the market or the sector since 2017.
  - b) The Office also invites the Parties to submit their views on the additional issues identified in paragraph 4 a) and paragraphs 5 a), b) and c) above, including on their relevance, whether it is appropriate to consider them as part of Consultation 2016-2, what processes, procedures, conditions and/or rules currently apply, and how those should be modified (if at all) in order to promote and maintain an efficient, economic and harmonised utilization of ICT infrastructure in the Cayman Islands. In all submissions, the Office requests that the responses by the Parties be detailed and include all relevant documents in support of their positions.
  - c) The Office requests submissions in response to the preceding in paragraph 4 a) and paragraphs 5 a), b) and c) above on or before **5PM** on **Friday, 11 November 2022**, submitted via email to [ict@ofreg.ky](mailto:ict@ofreg.ky).
  - d) The Office considers that the existing administrative record of Consultation 2016-2 continues to be relevant. This includes the documents listed in the Attachment 1 to this letter. However, the Office also considers that the record needs to be brought up to date to reflect any changes in the ICT sector since 2017.
  - e) The Office further considers that the Office requires additional information in order to properly identify the appropriate pricing principles for determining recurring fees for attachments and non-recurring fees for make-ready work.
  - f) The Office considers that this information is necessary because, given the Office's functions which include *promoting and maintaining an efficient, economic and harmonised utilization of ICT infrastructure*, the Office requires an up-to-date understanding of the utilization of the CUC utility pole infrastructure by ICT licensees in Grand Cayman, and the associated economic transactions, in order to in particular:
    - i. assess the capacity of that infrastructure to accommodate communications facilities,
    - ii. assess the scope of the make-ready required to complete the roll-out of fibre optic cable networks across the island, and
    - iii. assess whether or not the charging principles relating to the attachment of communication cables to CUC utility poles, namely the charges levied for



make-ready work and the pole attachment fees, are cost-orientated, reasonable and arrived at in a transparent manner.

8. Accordingly, pursuant to section 9(1) of the Utility Regulation and Competition Act (2021 Revision) ('**URC Act**') and Condition 4.1 of the ICT Licences issued to the Parties, the Office requests that the Parties respond to the RFIs set out in the Attachment 2 to this letter. The Office requests responses to the attached RFIs in Attachment 2 on or before **5PM** on **Friday, 11 November 2022**, submitted via email to [ict@ofreg.ky](mailto:ict@ofreg.ky).
9. If the Parties do not comply as requested within the timeframe specified, the Office notifies the Parties that the Office may exercise its powers under section 11 of the URC Act.

### **Confidentiality**

10. If any of the Parties choose to file any information in confidence with the Office, it must, **at the time of making the filing**, also file redacted versions for the public record along with the reasons for each confidentiality claim and the other requirements for confidentiality claims as specified in section 107 of the URC Act and in the Information and Communications Technology Authority (Confidentiality) Regulations 2003. The Office refers the Parties particularly to Regulations 4(1)(b) and (c) of the Confidentiality Regulations, which set out what needs to be included in such a request.
11. The Office will share submissions received with the Parties addressed in this letter, subject to any claims of confidentiality which have been accepted by the Office.

Yours Faithfully,

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Daniel Ebanks  
Manager ICT Infrastructure  
**OfReg**

## Attachment 1

### Record of ICT Consultation 2016-2

1. Background Material on the Dispute<sup>2</sup> leading to ICT Consultation 2016-2 (see paragraphs 10 through 25 of ICT Decision 2016-2<sup>3</sup>)
2. ICT Consultation 2016-2<sup>4</sup>
  - Consultation document (27 April 2016)
  - Comments on ICT Consultation 2016-2 (Flow, Digicel, C3, DataLink – submitted 12 July 2016)
3. Pole Sharing Agreements in effect up to and including 2017
  - CUC-Flow Agreement for Licensed Occupancy of CUC Poles (1996)<sup>5</sup>; Flow-CUC-DataLink Novation and Amendment Agreement (2012)<sup>6</sup>; DataLink-Flow Master Pole Joint Use Agreement (2016)<sup>7</sup>
  - CUC-C3 Master Pole Joint Use Agreement (2005)<sup>8</sup>; CUC-C3 Deed of Variation (2012)<sup>9</sup>; CUC-C3-DataLink Novation Agreement (2012)<sup>10</sup>
  - CUC-DataLink Master Pole Joint Use Agreement (2012)<sup>11</sup>
  - DataLink-Logic Master Pole Joint Use Agreement (2013)<sup>12</sup>; CUC-DataLink-Logic Memorandum of Understanding (2016)<sup>13</sup>

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<sup>2</sup> Background Material on the Dispute - <https://www.ofreg.ky/consultations/infinity-datalink-pole-attachment-dispute>

<sup>3</sup> ICT Decision 2016-2 - <https://www.ofreg.ky/viewPDF/documents/ict-decision/2021-05-13-05-40-39-ICT-Decision-2016-2-Infinity-DataLink-Pole-Attachment-Decision.pdf>

<sup>4</sup> ICT Consultation 2016-2 - <https://www.ofreg.ky/consultations/icta-consultation-2016-2>

<sup>5</sup> CUC-Flow Agreement for Licensed Occupancy of CUC Poles (1996) - <https://www.ofreg.ky/viewPDF/documents/interconnections/2021-04-20-07-40-35-1417708148CableWirelessAgreementforLicensedOccupancyofCUCPoles1996Redacted.pdf>

<sup>6</sup> Flow-CUC-DataLink Novation and Amendment Agreement (2012) - <https://www.ofreg.ky/viewPDF/documents/interconnections/2021-04-20-07-36-05-1417708190NovationAgreementCUCDataLinkLIMENov2012executed.pdf>

<sup>7</sup> DataLink-Flow Master Pole Joint Use Agreement (2016) - <https://www.ofreg.ky/viewPDF/documents/interconnections/2021-04-20-04-45-13-MasterPoleJointUseAgreement1480965308.pdf>

<sup>8</sup> CUC-C3 Master Pole Joint Use Agreement (2005) - <https://www.ofreg.ky/viewPDF/documents/interconnections/2021-04-20-07-47-23-1417708344MasterPoleJointUseAgreementCUCInfinityBroadbandRedacted.pdf>

<sup>9</sup> CUC-C3 Deed of Variation (2012) - <https://www.ofreg.ky/viewPDF/documents/interconnections/2021-04-20-07-46-13-1417708388DeedofVariationCUCInfinityBroadband.pdf>

<sup>10</sup> CUC-C3-DataLink Novation Agreement (2012) - <https://www.ofreg.ky/viewPDF/documents/interconnections/2021-04-20-07-43-03-NovationAgreementInfinityBroadband-CUC-DataLink-EXECUTED1458325571.pdf>

<sup>11</sup> CUC-DataLink Master Pole Joint Use Agreement (2012) - <https://www.ofreg.ky/viewPDF/documents/interconnections/2021-04-20-07-27-15-ICTACUCDataLinkAgreement20March20121458325766.pdf>

<sup>12</sup> DataLink-Logic Master Pole Joint Use Agreement (2013) - <https://www.ofreg.ky/viewPDF/documents/interconnections/2021-04-20-07-30-40-141770785920130718DataLinkWestTelMasterPoleJointUseAgreement.pdf>

<sup>13</sup> CUC-DataLink-Logic Memorandum of Understanding (2016) - <https://www.ofreg.ky/viewPDF/documents/consultations/2021-04-09-01-53-34-12-July-2016-DataLinkLogic-MoU.pdf>

#### 4. Pole Attachment Working Group<sup>14</sup>

- Initial Letter to Parties (7 December 2016)
- Position Papers, including DataLink draft Pole Sharing Agreement proposal (Digicel, DataLink, C3, Logic – submitted 21 April 2017; Flow – submitted 26 April 2017)
- Process Letter to Parties (1 June 2017)
- Reply Comments (Flow, Digicel, DataLink, Logic – submitted 16 June 2017; C3-submitted 20 June 2017)
- Resumption Letter to Parties (30 June 2017)

#### 5. National Electrical Safety Code (2012) *(The Office is unable to share this document as it is subject to copyright and must be purchased).*

#### 6. CUC Electricity Transmission and Distribution Licence (2008)<sup>15</sup>

#### 7. Judgment in CUC Restraining Order Application against Logic (2015)<sup>16</sup>

#### 8. United States Federal Communications Commission (“FCC”) documents

- Order and Further Notice of Proposed Rulemaking, FCC 10-84<sup>17</sup>, 20 May 2010
- Report and Order and Order on Reconsideration, FCC 11-50<sup>18</sup>, 7 April 2011

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<sup>14</sup> Pole Attachment Working Group - <https://www.ofreg.ky/ict/icta-forms-pole-attachment-working-group>

<sup>15</sup> CUC Electricity Transmission and Distribution Licence (2008) - <https://www.ofreg.ky/viewPDF/documents/energy-licensees/2021-04-29-03-54-03-cuc-td-licence-2008.pdf>

<sup>16</sup> CUC Restraining Order application against Logic Judgment - <https://www.ofreg.ky/viewPDF/documents/others/2021-04-28-01-10-31-1458327054CUCLtdvWestelLtdTALogic.pdf>

<sup>17</sup> FCC 10-84 - [https://docs.fcc.gov/public/attachments/FCC-10-84A1\\_Rcd.pdf](https://docs.fcc.gov/public/attachments/FCC-10-84A1_Rcd.pdf)

<sup>18</sup> FCC 11-50 - <https://docs.fcc.gov/public/attachments/FCC-11-50A1.pdf>

## Attachment 2

### Requests for Information

#### RFIs to all Parties (General)

- 101** Provide a copy of all pole sharing agreements currently in force. Advise, if applicable, whether a new pole sharing agreement is being negotiated.
- 102** Confirm the pole attachment fee currently (2022) paid or charged, as applicable. Specify the frequency of payment, and whether the fee is charged per pole or per attachment.
- 103** Identify all changes to the pole attachment fee paid or charged, as applicable, between 2017 and 2022, inclusive, and the date(s) any changes came into effect.
- 104** Provide any additional information or documentation that may be relevant to the issues being addressed in this proceeding, including a detailed explanation of why they are relevant.

#### RFIs to Flow

- 201** Provide the following information for end of each quarter in the period Q1 2018 to Q2 2022:
- a) total number of CUC poles occupied (attached to) by Flow's fibre optic cables
  - b) total amount related to Quarterly Attachment Fees paid by Flow to DataLink.
- 202** Provide a breakdown of the total number of poles, per each quarter in the period Q1 2018 to Q2 2022, for which a permit application has been filed but Flow did not proceed with the attachment, between:
- a) "Green Poles" - poles that did not require strengthening (i.e., Make-Ready work was not required)
  - b) "Red Poles with pole replacement" - poles that required strengthening (i.e., Make-Ready work was required), and which required pole replacement (i.e., a new pole was installed)
  - c) "Red Poles without pole replacement" – poles that required strengthening (i.e., Make-Ready work was required), and which did not require pole replacement (i.e., an existing CUC pole has been used for attachment of communications cables).
- 203** Provide the following information for end of each quarter in the period Q1 2018 to Q2 2022:
- a) total amount paid as make-ready charges
  - b) total amount included in a) which was paid as proportional make-ready charges previously invoiced to a prior attacher; and
  - c) total amount received as a refund of make-ready costs previously paid which became refundable as a result of a subsequent attacher attaching within the same communications space.

- 204** Provide total number of CUC poles occupied (attached) by Flow's copper cables, for end of each quarter in the period Q1 2018 to Q2 2022.

### **RFIs to DataLink**

- 301** Provide the following information per each attacher (including if applicable DataLink and/or CUC) and for end of each quarter in the period Q1 2018 to Q2 2022:
- a) total number of CUC poles occupied (attached) by the attacher's fibre optic cables
  - b) total amount related to Quarterly Attachment Fees paid by the attacher.
- 302** Provide the following information regarding Make-Ready work per each CUC pole, per each attacher (including if applicable DataLink) and per each quarter in the period Q1 2018 to Q2 2022:
- a) total cost of Make-Ready work and the total number of poles, which did not require pole replacement
  - b) total cost of Make-Ready work and the total number of poles, which required pole replacement.
- 303** Provide a breakdown of all CUC poles for which a permit application has been filed, per each attacher (including if applicable DataLink) and per each quarter in the period Q1 2018 to Q2 2022, between:
- a) "Green Poles" - poles that do not require strengthening (i.e., Make-Ready work is not required)
  - b) "Red Poles with pole replacement" - poles that require strengthening (i.e., Make-Ready work is required), and which require pole replacement (i.e., a new pole would need to be installed)
  - c) "Red Poles without pole replacement" – poles that require strengthening (i.e., Make-Ready work is required), and which do not require pole replacement (i.e., an existing CUC pole can be used for attachment of communications cables).
- 304** Provide a breakdown of the total number of new attachments, per each attacher (including if applicable DataLink) and per each quarter in the period Q1 2018 to Q2 2022, between:
- a) "Green Poles" - poles that did not require strengthening (i.e., Make-Ready work was not required)
  - b) "Red Poles with pole replacement" - poles that required strengthening (i.e., Make-Ready work was required), and which required pole replacement (i.e., a new pole was installed)
  - c) "Red Poles without pole replacement" – poles that required strengthening (i.e., Make-Ready work was required), and which did not require pole replacement (i.e., an existing CUC pole has been used for attachment of communications cables).
- 305** Provide the total number of CUC poles, per each attacher (including if applicable DataLink) and per each quarter in the period Q1 2018 to Q2 2022, on which DataLink is aware that existing communications cables have been replaced by new/different communications cables.



- 306** Provide the total number of CUC poles, per each attacher (including if applicable DataLink) and per each quarter in the period Q1 2018 to Q2 2022, that require wayleaves vs total poles for which a permit application has been filed.
- 307** Provide a breakdown of the total number of CUC poles, per each attacher (including if applicable DataLink) and per each quarter in the period Q1 2018 to Q2 2022, for which a permit application has been filed but the applying licensee did not proceed with the attachment, between:
- a) “Green Poles” - poles that did not require strengthening (i.e., Make-Ready work was not required)
  - b) “Red Poles with pole replacement” - poles that required strengthening (i.e., Make-Ready work was required), and which required pole replacement (i.e., a new pole was installed)
  - c) “Red Poles without pole replacement” – poles that required strengthening (i.e., Make-Ready work was required), and which did not require pole replacement (i.e., an existing CUC pole has been used for attachment of communications cables).
- 308** Provide the following information, per each attacher (including if applicable DataLink) and at end of each quarter in the period Q1 2018 to Q2 2022:
- a) total number of attachment permits issued to the applying licensee
  - b) total number of fixed fees paid by the applying licensee.
- 309** Provide the following information related to the number of attachments (including if applicable DataLink) per each CUC pole and at end of each quarter in the period Q1 2018 to Q2 2022:
- a) total number of CUC poles with one (1) attachment on each pole
  - b) total number of CUC poles with two (2) attachments on each pole
  - c) total number of CUC poles with three (3) attachments on each pole
  - d) total number of CUC poles with four (4) attachments on each pole.
- 310** Provide a typical example of the total cost of Make-Ready work, between two cases:
- a) total cost of Make-Ready work to accommodate four attachments, and
  - b) total cost of Make-Ready work to accommodate one single attachment only, and
  - c) if there is any difference in costs between these two cases, provide further clarification to justify the cost difference.
- Explain in detail any assumptions and the basis for those assumptions that may have been made in providing the response.
- 311** Provide copies of DataLink’s financial statements for the period Q1 2018 to Q2 2022.
- 312** Provide a detailed explanation about the following expenses listed in DataLink’s financial statements, including what are they composed of and how are they calculated:
- a) Depreciation & Amortization
  - b) General and Administrative Costs
  - c) Network Operations Expense
  - d) Provision for Bad Debt

- 313** Provide a detailed explanation about the following assets listed in DataLink’s financial statements, including what are they composed of and how are they calculated:
- a) Intangible Asset – License (net)
  - b) Property, plant and equipment (net)
  - c) Inventory
- 314** Provide a detailed explanation about the following liabilities listed in DataLink’s financial statements, including what are they composed of and how are they calculated:
- a) Accounts payable and accrued expenses
  - b) Intercompany Accts Payable
  - c) Deferred Revenue
  - d) Intercompany Loans Payable
  - e) Long Term Debt
- 315** Referring to the definition of “Applicable Standards” in DataLink’s Pole Sharing Agreements, confirm whether there have been any relevant changes to the NESC since 2012 or to any other applicable engineering and safety standard since 2017. If there have been any such relevant changes, describe them in detail and provide copies of the current relevant standards.

### **RFIs to Digicel**

- 401** Provide the following information for end of each quarter in the period Q1 2018 to Q2 2022:
- a) total number of CUC poles occupied (attached to) by Digicel’s fibre optic cables
  - b) total amount related to Quarterly Attachment Fees paid by Digicel to DataLink.
- 402** Provide a breakdown of the total number of poles, per each quarter in the period Q1 2018 to Q2 2022, for which a permit application has been filed but Digicel did not proceed with the attachment, between:
- a) “Green Poles” - poles that did not require strengthening (i.e., Make-Ready work was not required)
  - b) “Red Poles with pole replacement” - poles that required strengthening (i.e., Make-Ready work was required), and which required pole replacement (i.e., a new pole was installed)
  - c) “Red Poles without pole replacement” – poles that required strengthening (i.e., Make-Ready work was required), and which did not require pole replacement (i.e., an existing CUC pole has been used for attachment of communications cables).
- 403** Provide the following information for end of each quarter in the period Q1 2018 to Q2 2022:
- a) total amount paid as make-ready charges;
  - b) total amount included in a) which was paid as proportional make-ready charges previously invoiced to a prior attacher; and

- c) total amount received as a refund of make-ready costs previously paid which became refundable as a result of a subsequent attacher attaching within the same communications space.

### **RFIs to C3**

**501** Provide the following information for end of each quarter in the period Q1 2018 to Q2 2022:

- a) total number of CUC poles occupied (attached to) by Infinity's fibre optic cables
- b) total amount related to Quarterly Attachment Fees paid by Infinity to DataLink.

**502** Provide a breakdown of the total number of poles, per each quarter in the period Q1 2018 to Q2 2022, for which a permit application has been filed but Infinity did not proceed with the attachment, between:

- a) "Green Poles" - poles that did not require strengthening (i.e., Make-Ready work was not required);
- b) "Red Poles with pole replacement" - poles that required strengthening (i.e., Make-Ready work was required), and which required pole replacement (i.e., a new pole was installed);
- c) "Red Poles without pole replacement" – poles that required strengthening (i.e., Make-Ready work was required), and which did not require pole replacement (i.e., an existing CUC pole has been used for attachment of communications cables).

**503** Provide the following information for end of each quarter in the period Q1 2018 to Q2 2022:

- a) total amount paid as make-ready charges;
- b) total amount included in a) which was paid as proportional make-ready charges previously invoiced to a prior attacher; and
- c) total amount received as a refund of make-ready costs previously paid which became refundable as a result of a subsequent attacher attaching within the same communications space.

### **RFIs to Logic**

**601** Provide the following information for end of each quarter in the period Q1 2018 to Q2 2022:

- a) total number of CUC poles occupied (attached) by Logic's fibre optic cables
- b) total amount related to Quarterly Attachment Fees paid by Logic to DataLink.

**602** Provide a breakdown of the total number of poles, per each quarter in the period Q1 2018 to Q2 2022, for which a permit application has been filed but Logic did not proceed with the attachment, between:

- a) "Green Poles" - poles that did not require strengthening (i.e., Make-Ready work was not required)
- b) "Red Poles with pole replacement" - poles that required strengthening (i.e., Make-Ready work was required), and which required pole replacement (i.e., a new pole was installed)

- c) “Red Poles without pole replacement” – poles that required strengthening (i.e., Make-Ready work was required), and which did not require pole replacement (i.e., an existing CUC pole has been used for attachment of communications cables).

**603** Provide the following information for end of each quarter in the period Q1 2018 to Q2 2022:

- a) total amount paid as make-ready charges;
- b) total amount included in a) which was paid as proportional make-ready charges previously invoiced to a prior attacher; and
- c) total amount received as a refund of make-ready costs previously paid which became refundable as a result of a subsequent attacher attaching within the same communications space.

### **Instructions to the Parties**

- a) Flow is required to provide its response to RFIs 201 to 204 in the Excel file named “RFIs Flow – 20221012”.
- b) DataLink is required to provide its response to RFIs 301 to 309 in the Excel file named “RFIs DataLink – 20221012”.
- c) DataLink may provide its response to RFI 310 in a Word document and/or Excel file.
- d) Digicel is required to provide its response to RFIs 401 to 403 in the Excel file named “RFIs Digicel – 20221012”.
- e) C3 is required to provide its response to RFI 501 to 503 in the Excel file named “RFIs Infinity – 20221012”.
- f) Logic is required to provide its response to RFI 601 to 603 in the Excel file named “RFIs Logic – 20221012”.