

LIME Responses to Authority Interrogatories
Re
Introduction of New Service
09 April 2015

1. Please provide Tariff Pages for the proposed Service.

LIME Answer: Pursuant to paragraphs 5, 13, 26 and 28 of Annex 5 to LIME’s 10 July 2003 ICT Licence, LIME is required to publish Tariff Pages for Category 1, 2, 4 and 5 services. By contrast, paragraph 20.1(a) of Annex 5 requires LIME “to publish all of its rates, terms and conditions (in a manner that is easily accessible and clearly indicates to user what terms and conditions apply to each ICT Service)” in respect of Category 3A services, while paragraph 20.1(b) exempts LIME from a publication requirement in respect of Category 3B services. In neither case is there a reference to “Tariffs”.¹

Since liberalisation in 2003, LIME has satisfied its Category 3 “publication” obligation by publishing in separate documents on its website (and in paper form upon request) the applicable service descriptions, rates and terms and conditions. In other words, provided that LIME’s rates, terms and conditions are available “in a manner that is easily accessible and clearly indicates to user what terms and conditions apply to each ICT Service”, LIME has the discretion to choose how to publish its rates, terms and conditions.

In this case, the Service clearly consists of the provision of #
#. As set out in LIME’s 25 January 2005 letter to the Authority regarding
#, and as acknowledged by the Authority in its 29 March
2005 letter regarding #, this is a Category # # service.

LIME notes that the Service is therefore at most #

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¹ As agreed with the Authority in 2003, “Tariffs” are a single document incorporating a description of the service, applicable rates, as well as terms and conditions of service.

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In any event, LIME considers that, in the circumstances, #
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Some of the information in the answer above, specifically information which would identify the nature of the service as well as information relating to LIME's customers and traffic, is being provided in confidence to the Authority pursuant to regulation 3 of the *Information and Communications Technology Authority (Confidentiality) Regulations, 2003*. It contains information that is a trade secret and that is financial and commercial information 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 can reasonably be expected to cause LIME significant financial gain and to prejudice significantly LIME's competitive position. LIME notes that the information identifying the nature of the service is confidential only until launch of the

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service, but the other information will continue to be confidential. A redacted version will be provided for the public record.

2. Please provide detailed calculations, along with all supporting documentation, used to determine # # specified in the imputation test for the proposed Service.

LIME Answer: The detailed calculations are set out in the confidential table below.

ROW			# #	# #	# #	Average
1	# # * Rate (USD)		###	###	###	
2	Exchange Rate		0.82	0.82	0.82	
3	Rate (KYD)	Row 1 * Row 2	###	###	###	
4	# # ** % of # #		###	###	###	
5	Average Rate	Sum of Row 3 * Row 4				###
	* #					#
	** #					#

The information in this answer relating to traffic and rates 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 and that is financial and commercial information 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 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.

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3. Please provide detailed calculations, along with all supporting documentation, used to determine # utilization specified in the imputation test for the proposed Service.

LIME Answer: The utilization ratio was based on an analysis of customers' usage of the same # plan offered by LIME's sister companies in five Caribbean countries where data was available. Usage from July 2014 to December 2014 was used in the analysis, which is summarized in the confidential table below.

ROW			#	#	#	#	#	#	#	#	Average
1	Active plans - 6-month avg.	Six month simple average of active monthly plans	###	###	###	###	###	###	###	###	
2	# # used - 6-month avg.	Six month simple average of monthly # # used	###	###	###	###	###	###	###	###	
3	# # in plan	Row 1 * ###	###	###	###	###	###	###	###	###	
4	% utilization of plan # #	Row 2 / Row 3	###%	###%	###%	###%	###%	###%	###%	###%	###%

The information in this answer relating to countries, customers and usage 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 and that is financial and commercial information 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 can reasonably be expected to cause LIME significant financial gain and to prejudice significantly LIME's competitive position. Disclosure of information provided by LIME's sister companies will also have chilling effect on those companies' willingness to share information with LIME, which will reduce the scope and quality of information available to the Authority for evidence-based regulation. A redacted version will be provided for the public record.

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