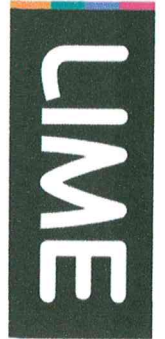




**UPGRADE  
CAYMAN**



18 March 2015

Ms. Tessa E. Ryan  
Economist  
Information and Communications Technology Authority  
PO Box 2502  
3<sup>rd</sup> Floor Alissta Towers  
Grand Cayman, KY1-1104

Dear Ms. Ryan,

**Re: Introduction of New Service**

Cable and Wireless (Cayman Islands) Limited, trading as LIME (“LIME”) writes further to the Authority’s letter of 27 February 2015 on the above subject (your ref: ICTA/160/161-09) and to the Authority’s follow up emails to LIME of 9 March 2015 and 17 March 2015. We thank you for the additional time granted to respond, and have attached confidential marked and redacted (i.e. for the public) versions of the Authority’s letter.

LIME requests confidential treatment of not only the name of the Service, as suggested by the Authority in its 17 March 2015 email to LIME, but also the nature and proposed categorisation of the Service in question. The proposed redaction of the Authority’s letter and of the questions contained therein follow from this request, and is consistent with the confidentiality claim included in LIME’s application of 17 February 2015.

Without limiting the scope of the confidentiality claim of 17 February 2015, LIME submits that both the name of the proposed Service and its nature and regulatory categorisation are confidential and commercially-sensitive information. As noted on 17 February 2015, LIME’s marketing and product development plans are information that is of a commercially sensitive nature and is consistently treated in a confidential manner by LIME until implementation. In the event the information were to be treated otherwise, LIME’s competitors and potential competitors would gain advance knowledge of LIME’s marketing and pricing plans, even before the information could be made available to LIME’s customers or to the general public. This would put LIME at a competitive disadvantage.

We must emphasize that it is not just disclosure of the name of the proposed Service that would cause LIME harm in the marketplace but also disclosure of the nature of the Service.

The market for this type of Service is highly competitive, with both local and overseas competitors, and the barriers to implementing competing plans are very low. In fact, the latest Industry Statistics published by the Authority on its website suggests that, as of 31 December 2014, LIME's competitors serve a majority of the market, no matter how narrowly or broadly the relevant market is defined (and unlicensed competition increases that non-LIME share even further). This means that even knowing the type of service that LIME is proposing to launch will enable LIME's competitors to launch their own equivalent services even before the Authority has completed its review. This would deprive LIME of the opportunity to compete fairly and effectively in the market, and would cause LIME material financial and competitive harm.

LIME submits, therefore, that the information for which it is claiming confidential treatment, both now and on 17 February 2015, is "confidential information" as defined in sub-regulations 3(a), (b), (d)(i) and d(ii) of the *Information and Communications Technology Authority (Confidentiality) Regulations, 2003* ("**the Regulations**"). In accordance with sub-regulations 4(1)(a) and 4(1)(c) of the Regulations, LIME has made its claim for confidentiality at the time of submitting the confidential information and has provided at the same time a redacted version of the documents for the public record. Further, LIME submits that the foregoing description of the confidential information, its competitive nature and the type of harm that would be caused to LIME if it were to be disclosed to third parties, meets the requirements set out in sub-regulation 4(1)(b) of the Regulations. In respect of sub-regulation 4(1)(b)(vii), LIME notes that it requests confidential treatment of the name of the Service and its nature and regulatory category only until such time as it is launched in the market, but that it requests continuing confidential treatment of the imputation test and related financial and customer information filed on 17 February 2015.

Please do not hesitate to contact the undersigned if you should have any questions or require further information.

Yours sincerely,  
Cable and Wireless (Cayman Islands) Limited, trading as LIME



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Bill McCabe  
Chief Executive Officer

c.c. David A. Cox, Head of Regulatory Affairs, LIME

Encl.