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Our ref: GRCR/GR 15.20

08 April 2014

Mr. Glen Daykin  
Acting Managing Director  
Information and Communications Technology Authority  
PO Box 2502  
3<sup>rd</sup> Floor Alissta Towers  
Grand Cayman, KY1-1104

Dear Mr. Daykin,

**Re: Introduction of New Service**

Pursuant to paragraph 31 of Annex 5 to its 10 July 2003 ICT Licence (the "**Licence**"), Cable and Wireless (Cayman Islands) Limited, t/a LIME ("**LIME**") applies to the Authority for authorization to offer a new service in the Cayman Islands for business customers called # (the "**Service**").

**Service Description**

#

#. The Service will be offered on a minimum one -year contract term basis.

**Service Category**

The Authority has stated in prior correspondence that it does not view this as a new Service, and therefore would categorize it as a Category 1 service. LIME continues to disagree with this view, as there is a fundamental and qualitative difference between a service, on the one hand, that #

#, and another service, on the other hand, that #. LIME notes that the market understands LIME's view, as customers are increasingly demanding the service LIME is proposing to introduce, even though # continues to be

**REDACTED**

readily available from LIME (and other providers) to all business customers in the Cayman Islands and should, in the Authority's view, be an adequate substitute.

Notwithstanding the foregoing, and without prejudice to LIME's view that this is not a Category 1 service, LIME reluctantly accepts Category 1 regulation of this otherwise competitive and discretionary service. The alternative would be continued inability to bring this service to business customers in the Cayman Islands.

### **Tariff Pages**

Proposed Tariff Pages are attached, in confidence, to this letter.

### **Imputation Test**

Pursuant to paragraph 46 of Annex 5 to LIME's ICT Licence, and pursuant to the Authority's view that the Service is "very similar, if not identical" to # , the relevant imputation test is the wholesale price for the service. The wholesale prices are set out in the confidential Attachment 1 to this letter, and the applicable Service Schedule to the Service Provider Agreement is attached, in confidence, as well.

Other licensed operators in the Cayman Islands will be notified of the new service and prices on or before the day LIME commercially launches the retail Service.

### **Effective Date**

LIME intends to begin offering this Service on a commercial basis on # #.

### **Confidentiality Claim**

This application and its attachments are filed under confidential cover. The marketing and product development plans of LIME's 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.

An abridged version of this letter will be filed. All confidential information in this letter will be replaced by "###". LIME does not propose to provide a redacted version of the attachments, as these would be meaningless.

**REDACTED**

Please contact the undersigned directly should you have any questions.

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

[signed]

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Frans Vandendries  
Vice President, Legal, Regulatory & Corporate Affairs

c.c. Bill McCabe, Chief Executive Officer, LIME  
Roderick Kirwan, Group General Counsel, LIME

Encl. (confidential)

**REDACTED**