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LIME

Our Ref: GR/CR/15.24
13 November 2008

Mr. David Archbold
Managing Director
Information and Communications Technology Authority
P.O. Box 2502
3rd Floor, Alissta Towers
Grand Cayman, KY1-1104

Dear Mr. Archbold

Re: Changes to NetSpeak Service

Pursuant to paragraph 8 of Annex 5 to the ICT Licence issued to Cable and Wireless (Cayman Islands) Limited (“LIME”) on 10 July 2003, LIME hereby applies for authorization to restructure and re-price its NetSpeak service.

1. NetSpeak Service Changes

In order to better align our service with the other LIME operating units in the Caribbean, we will be offering ###.

The out-of-plan international calling rate structure will also be simplified, with rates to most overseas countries being standardized on ### per minute. We also plan to offer all calls to NetSpeak numbers outside of the Cayman Islands at ###, although that will not be implemented for a couple of months while we work out unexpected issues with the billing systems. When those issues are sorted out, we will provide the Authority with an updated tariff page. The price for overseas telephone numbers (DIDs) will also be reduced, from CI\$ 5.95 to ### per month.

Prices for the other services and features (e.g. all domestic NetSpeak-to-mobile calls at CI\$ 0.27 per minute, activation fee of CI\$ 39.95, toll free plan for CI\$ 19.95 per month, etc...) will remain unchanged. Details of the new plans and prices can be found in the Tariff Pages attached to this letter.

REDACTED

Existing customers will be migrated from their current plans (“Basic”, “Plan A”, “Plan B” or “Plan C”) to the new ### “combo” plan, consistent with the new plan structure, which will give them increased value for a lower price than they pay today. Existing customers may change their plan or combo once at any time within two months of the effective date, without charge.

2. Imputation Test

We conducted an imputation test for the rates for the revised NetSpeak Service, a description of which is attached in confidence to this letter. As is evidenced by the attached, the rates pass the applicable test.

Consistent with the Authority’s 11 January 2007 rulings on the NetSpeak imputation test, we have provided separate imputation tests for the ### market segments, namely the ### groups of customers who take one of the ###. We have also applied the common cost factor specified by the Authority in that same letter.

3. Tariff Pages

Proposed revised pages for General Tariff Item 603 are attached.

4. Effective Date

In order to align ourselves with the launch plans of all of the other LIME operating units in the Caribbean, we request approval to begin offering the revised NetSpeak service beginning on ###, or on such other date as soon as possible thereafter.

5. Prior Proposed Revisions

On 18 July 2008, we had proposed certain other revisions to our NetSpeak Service, which were approved by the Authority on 24 October 2008, subject to certain amendments. Further to the last paragraph of the Authority’s 24 October 2008 letter, we hereby advise the Authority that we do not intend to implement the changes to the NetSpeak service proposed in our 18 July 2008 service filing. We acknowledge that the Authority had directed us to advise it by 7 November 2008. Unfortunately this proved not to be possible due to the impact of Hurricane Paloma on that date, and we apologize for any inconvenience this may have caused.

6. Confidentiality Claim

LIME is filing this application, including the attached imputation test description and proposed General Tariff Item pages, in confidence with the Authority. The marketing and product development plans of LIME are information that is of a commercial nature and is consistently treated in a confidential manner by us until they are implemented. Our competitors and potential competitors would gain advance knowledge of our marketing and pricing plans, even before the information could be made available to our customers or to the general public. This would enable them to develop competitive and targeted marketing and pricing responses, even before we would be able to implement our own plans.

An abridged version of this letter will be filed. We do not propose to file an abridged version of the attached documents, as such versions would be meaningless. All confidential information in this letter will be replaced by “###”.

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If there are any questions, please do not hesitate to contact the undersigned.

Yours faithfully,
Cable and Wireless (Cayman Islands) Limited

“Signed”

Darrel Rankine
Vice President Regulatory Affairs

c.c. Donald Austin, EVP Corporate Affairs and Regulatory
Anthony Ritch, Country Manager, Cayman

Encl.

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