

On behalf of CCT, please, see below our responses to the Interconnection Consultation:

Question 1 a): Do you have any objections to the above definitions?

No objections. We agree with the 7 market definitions.

Question 1 b): Do you see calling someone on their fixed phone as an equal substitute to calling someone on their mobile phone?

No.

Question 1 c): If the price of sending an SMS to either CCT, Digicel or LIME increased by 5-10% would you a) switch to making voice calls to CCT, Digicel and LIME mobile or b) switch to making voice calls to fixed lines?

We do not believe so (to both questions).

Question 2: Do you agree with our view that the geographic market for each of our proposed markets should be the Territory of the VI?

Yes, we agree in principle. However, as we indicated in our responses to the Interconnect RFI, in the case of the pan-Caribbean carriers it would be reasonable to consider their aggregated networks as their geographical markets. If this would be the case, it would also be reasonable to establish some kind of asymmetry in term of termination rates between mobile networks, because of the big differences in size (regional vs. local only). In other words, it would be reasonable for CCT to charge higher local mobile termination rates than LIME and Digicel regional networks.

Question 3: Do you agree that each operator is dominant in the respective termination markets

- 1) Wholesale mobile voice call termination provided by Caribbean Cellular Telephone Ltd
- 2) Wholesale mobile voice call termination provided by Digicel (BVI) Ltd
- 3) Wholesale mobile voice call termination provided by Cable and Wireless (BVI) Ltd
- 4) Wholesale fixed voice call termination provided by Cable and Wireless (BVI) Ltd
- 5) Wholesale SMS termination provided by by Caribbean Cellular Telephone Ltd
- 6) Wholesale SMS termination provided by Digicel (BVI) Ltd
- 7) Wholesale SMS termination provided by Cable and Wireless (BVI) Ltd

Yes, we agree

Question 4: Do you agree that SMS termination rates should remain unregulated?

Yes, we agree

Question 5: Do you agree that the TRC should address the issue of fixed and mobile termination rates?

Yes, we agree

Question 6: Please give your view on Bill and Keep. Do you think it is an appropriate to apply a bill and keep model to fixed /or mobile voice call termination in the VI?

We would be very interested in considering bill and keep models, where only minutes exceeding a certain % of traffic unbalance would be charged. As an example, a possible bill and keep model could be the following: No charges would be applied for termination if the unbalance is equal or below a certain % (say for instance 20%). Any traffic above such unbalance would be charged at the agreed rate.

Question 7: Do any stakeholders feel that a LRIC modeling exercise should be undertaken for the VI and have the resources to provide inputs to a LRIC model?

No, we do not believe that a LRIC modeling exercise should be undertaken for the VI. We do not believe that the VI operators have the resources to provide inputs to a LRIC model.

Question 8: Do you think it is appropriate for the TRC to follow a benchmarking exercise as the chosen

regulatory approach to determining the termination rates for the VI. If not, why not?

Yes, we do think that a benchmarking exercise is the most appropriate approach to determining the termination rates for the VI.

Question 9: Do you think it is appropriate for the TRC to benchmark against countries following the European Commission methodology taking account of an appropriate adjustment for VI operators? If not, why not?

Yes, we agree.