



CABLE & WIRELESS
JAMAICA

COMMENTS ON RESPONSES TO:

**TOWARDS UNIVERSAL SERVICE/ ACCESS
OBLIGATION FOR TELECOMMUNICATIONS SERVICES
IN JAMAICA**

A CONSULTATIVE DOCUMENT

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1. Introduction

Cable & Wireless Jamaica (C&WJ) is pleased to be afforded the opportunity to comment on the responses to the Consultative Document on “Towards Universal Service / Access Obligation for Telecommunications Services in Jamaica”, received from Digicel, Infochannel & Reliant Telecommunications, Stefan C. Wright and Georgia Gibson- Henlin.

2. Market Efficiency/ Access Gap and Roll –Out Targets

C&WJ agrees that universal service funding will only be needed to cover those areas and customers that would not be considered commercially viable – that is the access gap. In theory customers that are commercially viable should be served voluntarily by one or more operators in the liberalised environment closing any efficiency gap that may exist.

However C&WJ disagrees with the assertion by some respondents that the OUR’s access/efficiency gap analysis has *proven* that there is an efficiency gap in Jamaica. As stated in its response, C&W does not consider that ‘market efficiency’ comparisons based on benchmarks produce a definitive result because they cannot reflect all relevant local conditions. Rather they serve to provide a rough indication only, as to the scope of the efficiency and access gap that may exist.

Moreover, even if there is an efficiency gap, C&WJ refutes that this is due to any failure on its part to meet roll-out targets or is as a result of its former ‘monopoly’ status.

- Since C&WJ acquired controlling interest in the then Telecommunications of Jamaica (TOJ) in 1989, the number of main lines have grown from 87,000 in 1989 to over 500,000 today, moving teledensity from 3.5 % in 1989 to almost 20% today.
- On average C&WJ has rolled out over 30,000 mainlines every year since 1989. This rollout of infrastructure has cost in excess of J\$ 40 billion over the past thirteen (13) years, and has resulted in considerable expansion of service in rural areas, in spite of the difficulty of the terrain and customer affordability issues.
- This rate of growth and level of investment is considerably higher than in most countries at a comparable stage of economic development, and is certainly much greater than the growth achieved prior to C&WJ’s investment.

These figures are testament to the fact that the effective ‘privatisation’ of Telecommunications of Jamaica (TOJ) the former national telecommunications carrier and the management of C&WJ has itself, apart from any liberalisation of the sector, achieved tremendous results in terms of promoting investment in and development of

telecommunications. As indicated in C&WJ's initial response to the consultation, Jamaica compares favourably with other jurisdictions in terms of teledensity development in recent times.

In its response, Infochannel has commented on C&WJ's obligations under its 1999 Heads of Agreement with the Government of Jamaica.

Under the Heads of Agreement, C&WJ is obligated to install 217, 000 lines (gross), a target which the Company has exceeded. Therefore Infochannel's charges that C&WJ has not discharged its obligations are without merit.

3. Affordability of Service

C&WJ agrees with Mr Wright that the main issues regarding the provision of basic telephone service relate to the provision of 'affordable' service to those on low incomes and the provision of services in high cost areas at prices which do not reflect the high cost of serving the area (usually achieved through geographic averaging).

C&WJ also agrees with both Digicel and Infochannel that service options which meet the needs of those with affordability difficulties (eg through giving customers greater control over costs) are an essential component of a successful universal service regime. In this respect the prepay model appears attractive. But C&WJ believes that the solution from a universal service perspective, will be to develop packages for fixed service which offer these 'cost control' benefits. Indeed C&WJ indicated in its initial response that it is already examining various options to allow for greater cost control, including the possibility of a prepay fixed service.

However, C&WJ fundamentally disagrees with the assertions by some respondents that mobile phone service can deliver on the universal service objective of providing affordable phone service to Jamaicans or that mobile phone penetration should be considered in the context of assessing the access gap for universal service purposes:

- The OUR's own research shows that after taking account of just modest phone usage, mobile calls are more expensive than fixed, and this research does not take account of the high up-front cost of the mobile handset or the existence of an affordable 'Low User Package' from C&WJ.
- The OUR has failed to take account of the high mobile termination charges levied by companies such as Digicel on fixed line customers – which effectively cross-subsidise the provision of prepay mobile services to those mobile subscribers who mainly receive calls. Once these excessive termination charges are considered, mobile services appear far less 'affordable'. Furthermore, excessive mobile termination charges artificially inflate fixed service tariffs.

Another issue that is important to ensuring that services are affordable is keeping the costs of provision down to a minimum.

This can be achieved by setting universal service obligations such that they will not require duplication of existing infrastructure in uneconomic areas. Therefore in order to reduce cost and avoid duplication of facilities, C&WJ proposes that the Company be designated the Universal Service Provider where its fixed line infrastructure already exists and where this infrastructure does not exist that the “bids for subsidy” approach be employed, to provide appropriate incentives for cost-minimisation.

4. Fixed to Mobile Substitution

In suggesting that mobile phone service can serve the same purpose as fixed phones in the provision of universal service, respondents are implying that the two are effectively substitutes and that both have the characteristics needed to meet universal service needs.

C&WJ asserts that this assumption is not borne out by economic analysis, nor is it reflected in the approach taken by other countries, such as the European Union (EU), to universal service provision.

In economic terms, the following characteristics demonstrate that fixed and mobile cannot be considered to be substitutes:

- Fixed phones have different functionality from Mobile phones. Unlike mobiles, fixed phones, do not offer mobility outside the home to contact an individual. However, fixed phones tend to offer better quality of Internet connection than mobiles. This means that people often decide to have both. This is certainly the case in the United Kingdom (UK), where fixed penetration has remained high, despite the widespread take-up of mobile telephones. The OUR is itself of the position that mobile phone use complements fixed phone use, that is – many people who have a fixed line phone choose also to have mobile service.
- The price of mobile phone calls do not appear to be constrained by fixed calls. It appears that people will pay considerably more for a mobile call – suggesting that there is a premium for mobility that puts it in a separate market from that for fixed calls. Indeed, C&WJ makes reference to the consultation on “ Dominant Public Voice Carriers No. 2”, published by the OUR in November 2002 in which C&WJ agrees with the OUR that there is no fixed to mobile substitution, and asserts rather that the services are complementary. If both services were substitutable, the level of price differential could not be sustained

Furthermore, quite apart from the issue of economic substitutability, C&WJ considers that there are well-founded social reasons to support the use of fixed technologies (whether those be wireline or wireless) for universal service.

- Mobile phones tend to serve individuals, whereas fixed phones will serve an entire household. This means that each additional fixed phone goes much further towards delivering on the objective of universal access.
- An important component of universal service is the ability to access emergency services. This is available on a continual basis from fixed phones, but since mobile phones require continual recharging, this service may not be available when most needed.

5. Technology to Provision Universal Service

C&WJ has stated clearly the economic and social reasons for advocating that universal service should be applied to fixed rather than mobile telephone service. . This is consistent with the approach taken in the Act, which refers to the ‘need to promote access to single line voice telephone services throughout the Island to persons regardless of place of residence or work’.

6. Criteria for Being Universal Service Provider

Digicel has stated that it is on its way to meeting its license obligation of covering 90% of the island by 2005 and that by virtue of its license obligation, it is a Universal Service provider (USP). However C&WJ disputes that such obligations constitute a Universal Service Obligation (USO) for the following reasons:

- Mobile Network roll-out obligations cannot be regarded as an obligation to provide service to customers.
- C&WJ is not aware of established universal service schemes in any part of the world where mobile operators have been designated USPs. Digicel and other mobile carriers are not required to provide basic telephone service ‘at affordable prices’ or at geographically averaged rates which are key constituents of any universal service regime. This is reflected in the fact that prices are above those charged for fixed services. When up-front charges for handsets and even a small amount of calls are included, the provision of service through mobile phones could not be described as ‘affordable’ in comparison to fixed line service. Therefore while mobile service may be available customers are constrained by affordability.
- Charges to mobile phone users are effectively being subsidised through the excessive charges levied by Digicel to make fixed to mobile calls. This could lead to some packages, such as prepaid mobile appearing to be ‘affordable’ when in fact (based on the actual costs of operating the service) it would not be.
- Digicel and other mobile carriers are not required to provide special packages for affordability reasons such as prepay or low usage packages. The provision of such packages is at their discretion and, presumably, would not be offered unless they were commercially viable.

- Universal access / service is directly related to access to the network at a fixed location by a community or family. Mobile phones, whilst providing the benefit of mobility to individuals, cannot fulfill the key universal service requirement of providing access to a household or group of citizens.
- The provision of universal service must include continual access to emergency services. This cannot be guaranteed with mobile phones which need frequent charging and may not be available when most needed.
- Digicel and other mobile carriers are not obliged to offer service to all on reasonable request.

Further Digicel claims that it provides service in uneconomic areas and therefore fulfills a USO. C&WJ contends that providing service in uneconomic areas is not a sufficient criterion to fulfill the provision of USO since economic customers can be found even in areas that are uneconomic when taken as a whole. No doubt Digicel does have economic customers in uneconomic areas, but it is fallacious to claim that geographic coverage equates to universal service.

7. Payphones

Digicel and Mr. Wright have correctly stated that the payphone market is characterised by substitution from mobile and Digicel also recognizes the endemic problem of vandalism. C&WJ agrees with Infochannel and Mr. Wright that requirements to maintain payphones should only apply to those payphones which are essential for ensuring telephone access to communities that would otherwise lack access. C&WJ also agrees with Infochannel that the OUR should tender for operators to offer service in such circumstances and provide subsidies to the successful bidder. However, where C&WJ is already providing such service, in order to avoid wasteful and costly network duplication, C&WJ proposes that the Company be designated the USP and be compensated for the net cost of maintaining service in those areas.

As indicated in its previous response, C&WJ has rolled out 1,000 payphones per annum from fiscal 1999 to 2001, the majority of these as replacements for vandalized payphones. As previously proposed C&WJ continues to advocate that the Office does a bottom-up assessment of the need for payphones in communities.

C&WJ cannot support Digicel's proposal to apply OFTEL's criteria for the provision of payphones, which is clearly unsuited to the situation in Jamaica. Nor is Digicel's simplistic proposal of a public education programme the solution. Certainly nothing less than a needs analysis will sufficiently indicate the necessity for payphones in any area. It must also be borne in mind that resources are limited and the efforts at universal access / service should not be misdirected.

It is noted that Infochannel proposes that no consideration be given to the recovery of overhead costs in calculating the net cost of payphone provision. It is regulatory best practice that products and services recover their cost including an appropriate attribution of common costs. Failure to allow such cost recovery would exclude those that specialise in payphone services from tending to provide universal service and require multi-service providers to cross-subsidise between services, contrary to regulatory best practice. Therefore it is with good reason that section 38 (c) of Telecommunications Act 2000 (the Act) states that:

“a licensee who is required by this Act to provide universal service shall be entitled to compensation in relation to the net costs incurred in meeting that requirement;”

8. Net Benefits of Being Universal Service Provider

Digicel has proposed that the OUR should consider a fifth funding mechanism which Digicel terms the “Net Benefit” approach which has been implemented in the United Kingdom (UK) by the Office of Telecommunications (OFTEL).

C&WJ strongly opposes this approach.

Firstly, it should be noted that the consideration of net benefits is not an additional funding mechanism separate from those that the OUR has identified. Rather it is a factor that may be taken into account when calculating the net costs of a universal service obligation in the context of calculating the amount needed for the universal service fund. A decision to take account of net benefits does not imply that the benefits will automatically outweigh the costs nor does it obviate the need to establish a universal service funding mechanism.

Secondly, it is inappropriate to suggest, as Digicel has done, that the costs and benefits of being the universal service provider in the UK (or elsewhere in the EU) can in any way be used as a proxy for universal service costs in Jamaica.

UK Market Inappropriate Proxy

The main distinctions between Jamaica and the UK markets are as follows:

- *BT’s network covers the entire UK.* This means that the ongoing costs of universal service relate only to ongoing maintenance in a few high cost areas. This is not the case in Jamaica where portions of the country and some homes remain without fixed telephony provision and universal service needs to include provision for build-out of networks.
- *BT’s build-out was funded through cross-subsidies and Government contributions* over decades as a nationalised operator. By contrast C&WJ’s investment came from private sources, has been made over the past 10 years, and cross-subsidies employed during the relatively short monopoly period have not yet recouped that significant investment.

- *The geography and population distribution of the UK are not particularly challenging* from the perspective of universal service and nearly all areas are readily accessible for maintenance and repair. This is not the case in Jamaica, where the population is more dispersed, access to some areas is difficult and the terrain is
- *Access charges in the UK are close to being fully rebalanced* and even at the fully rebalanced rate (of around US\$15 per month), are affordable for most households (UK per capita GDP was around \$24,430 in 2000 according to the World Bank). This means that very little subsidy is needed to provide for low income consumers. In Jamaica on the other hand, line rental rates are far from being rebalanced and raising those rates is liable to result in there being a substantial affordability issue (GDP per capita in Jamaica was estimated at \$2,610 in 2000). Addressing this problem through the universal service regime is no small task and will be expensive relative to the UK.

The above considerations mean that, even taking into account any ‘net benefits’ that supposedly accrue to the universal service provider, the costs would, unlike the UK, almost certainly outweigh the benefits.

Further, the following is to be noted, in examining the “intangible benefits” supposedly accruing to any USP, using the OFTEL standard, as proposed by Digicel:

Brand Image

As an ‘establishment’, formerly nationalised company in a wealthy country, it is likely that BT does enjoy support by virtue of its ubiquity and long-standing existence. However, C&WJ, as a brand, has only existed in its present form since 1989 and does not have the same heritage in Jamaica that BT has in the UK, nor is the Company considered indigenous to Jamaica as BT is indigenous to the UK and . Furthermore, C&WJ has had to undertake some activities (such as tariff rebalancing) that have been unpopular with Jamaican consumers. In many ways, far from being the ubiquitous ‘operator of choice’ C&WJ’s impression has been that consumers have openly embraced competition.

Lifecycle

The lifecycle benefit that Digicel refers to of being able to retain an uneconomic customer when that customer becomes economic is purely speculative and such an eventuality cannot be predicted by anyone and therefore it is hardly grounds for conferring a benefit on any Service Provider. This was recognised by OFTEL, which in recalculating the ‘intangible benefits’ of UK universal service in 1999, effectively reduced the benefit from “lifecycle” to zero (0).

Payphones

Digicel had proposed basically the same argument in support of an intangible benefit arising from payphone usage as it had proposed for “lifecycle”. As indicated previously the benefit from “lifecycle” is zero and therefore, logically, any intangible benefits arising from

payphone usage would also be zero. Furthermore, payphones, as C&WJ had indicated in its previous response, are not likely to be as central a facility for providing universal service as the Office had envisaged, which supports even further the redundancy of any benefits arising from payphone usage.

Ubiquity

Digicel has proposed that customers who move from one area to another would be inclined to keep their service provider. However, the reverse is also true, where customers often take the opportunity of moving to check their options and switch suppliers. Even more importantly, this alleged benefit was considered by OFTEL to be redundant in its 1999 assessment and the benefit from “ubiquity” was reduced to zero (0).

Moreover, C&WJ notes that the approach of calculating ‘benefits’ in Universal Service has been challenged by experienced consultancy firms such as Ovum. In its Universal Service Funding: World Best Practices paper of September 1999, Ovum states that:

Methodologies that subtract an amount for the indirect benefits that an operator derives from being a USO provider are not convincing.

In conclusion, C&WJ considers that Digicel’s argument that a ‘net benefit’ approach would mean that there is no cost to USO in Jamaica is fallacious, fails to take account of the significant differences in geography or state of economic and technological development between the UK and Jamaica, and has given no consideration to the individual characteristics of each market.

Consistent with the Act, C&WJ should be compensated for the net costs of providing basic telephone services at fixed locations in high cost areas and to low income customers. If C&WJ is obliged to provide ‘affordable’ services without compensation it will be subject to a financial burden that is not faced by other operators – this is not compatible with the fair and non-discriminatory application of regulation and would violate section 39 (5) (b) of the Act which prohibits any “...*unfair or unreasonable burden on the universal service provider...*”

9. Choosing the Universal Service Provider

C&WJ agrees that competitive bidding is the most effective and cost-efficient way of designating universal service providers in areas where service is not currently provided. However, C&WJ proposes that this approach be confined to areas where new build is needed or new services are being provided, since tendering for the services that C&WJ already provides will encourage inefficient duplication of infrastructure and divert funds from the communities that need it most.

C&WJ thus recommends that the Company be designated the universal service provider for those areas and services which it already covers and that the Company be compensated for

the net cost of maintaining these services at 'affordable' geographically averaged rates. For areas which are unserved, competitive tendering is recommended to select the USP.

C&WJ sees 'pay or play' and 'competitive bidding' as alternatives rather than complementary options for the provision and funding of universal service. Under 'pay or play' a service provider chooses voluntarily to provide service to an unserved area (i.e. it "plays" without bidding) which meets the universal service criteria. As a result, it becomes the exclusive provider in that area (ie other operators have chosen to "pay"). The 'net cost' of serving that area is then subtracted from the total universal service contribution for that service provider. Therefore the service provider still contributes to the fund, once the cost of providing service to the unserved area is less than the service providers total universal service funding obligation.

By contrast with competitive bidding, the regulator offers all operators the opportunity of serving a given area which meets universal service criteria and seeks estimates from the industry as to how much the cost of rolling out service to that area will be.

Of these two options, C&WJ supports competitive bidding because it provides incentives for efficient provision of services (the best candidate will win the tender) and will more effectively identify the net cost of rolling out service to a unserved area (the initial net cost will effectively be the amount of subsidy requested).

Without the 'bidding' process, it would be difficult to verify the value of infrastructure roll-out delivered by an operator which chose to 'play'. Thus, there could be loss of efficiency in the economy and potential for higher subsidy requirements within the industry as a whole (ie increase in subsidy required would have a corresponding increase in contributions required from other operators).

10. Internet Service for Schools

While C&WJ agrees with Mr. Wright that internet access to schools is expensive, the Company nonetheless believes that providing narrowband access to schools should take priority over access in Post Offices and libraries. Like Infochannel, C&WJ believes that it is important to encourage the provision of Internet access to schools so that children will become familiar with and obtain the benefit of the information society from an early age. Furthermore, Internet use at school would be more effective in producing a future generation that is more technology literate and who could leverage the use of technology and knowledge in developing the country.

However, it should be remembered that a ceiling of 5% of revenues has been applied to universal service. This means that it is particularly important to limit the scope of USO to that which is affordable and prioritise services appropriately. C&WJ considers that the main focus should be provision of basic telephone services to all Jamaicans (and to schools, some of which currently lack basic access), including the maintenance of 'affordable' service in

existing areas as well as any expansion to currently unserved areas. Support for Internet access in schools should be limited to narrowband access and be provided only to the extent that it can be achieved without in addition to (but without jeopardising) the objective of ensuing basic telephone access.

C&WJ supports Infochannel that a separate programme should be established to get computer hardware and software into schools. The telecommunications industry should not be required to subsidise the provision of a non-telecom related product such as computer hardware. To do so would effectively result in the imposition of a tax on the telecoms industry to subsidise the IT industry. Instead, as Infochannel and Mr. Wright have suggested, companies could donate PCs to schools on a voluntary basis, even as C&WJ has done. In addition, a partnership between the government and computer /software vendors could be created to provide schools with PCs and software.

C&WJ's conclusion as set out in its initial response to the USO consultation is that the Government should address the issue of Internet access to schools, but:

- The initial focus should be on ensuring that schools have access to basic telephony
- Targets for Internet access for schools should be realistic (bearing in mind the limits of the universal service fund) and relate to narrowband rather than broadband access. They should not displace funds to ensure affordable access to basic telephony.
- Telecommunications providers should not fund the provision of hardware. This should be part of a separate initiative, perhaps conducted with the assistance of IT manufacturers and businesses
- Compensation must be provided for the net cost of provisioning ISP services to schools,
- C&WJ should be designated the Universal Service Provider where it already offers such services.
- The provision to currently unserved schools (to the extent that such provision is possible within the constraints of the fund) should be opened to competitive tender.

11. Charging for Internet Service at Post Offices and Libraries

C&WJ agrees that post offices and libraries should be able to charge for Internet services and hopes that in many cases, these activities will be self-financing obviating the need for universal service support. As regards subsidies for students, charges levied by post offices and libraries could usefully be structured so as to allow for cheaper provision for students than for other individuals. However, providing that overall, the service recovers its costs, it should not be necessary for additional support to be provided from the universal service fund.

The OUR should bear in mind that commercial Internet cafes and access points will be competing with post offices and libraries in the provision of public Internet access. It is thus important to ensure that provisions for public institutions do not distort the competitive

landscape. This means that subsidies should be provided only where the institutions in question would not be able to recover its costs and where competitive supply is limited.

12. Cross Subsidisation

As Infochannel / Reliant Corporate Communications Ltd has stated, C&WJ, like any other company, has the right to structure its business in the most efficient and effective way to make the Company competitive in the marketplace.

All services provided by C&WJ for which there is a competitive concern are under a price cap imposed by the OUR. The prices of interconnection and wholesale services in markets where C&WJ has been presumed dominant are also controlled. Indeed in order to arrive at interconnection charges, C&WJ went through a painstaking process with the Office of Utilities Regulation to disaggregate the relevant cost and to arrive at the per minute interconnection charge.

This means that there is little scope for C&WJ to cross-subsidise between services. The only exception is the cross-subsidy between access to the Public Switched telephone Network (PSTN) and international services, where the cap imposed by the OUR on C&WJ's access charges has prevented it from charging customers the full cost of access.

C&WJ agrees that accounting separation would serve to make its cost and price structure even more transparent. The Company has been pro-active in engaging the Office in discussions to make progress on accounting separation and awaits further direction from the Office on this matter.

13. ADC and Universal Service Funding

C&WJ notes Infochannel's proposal that ADCs need to be reviewed to take account of universal service funding contributions. C&WJ agrees that it is important that access deficit and universal service costs are identified separately, though of course the methodologies employed must ensure that there is no double counting.

Establishing a fund for recovery of universal service costs should not therefore require a review of ADCs. For as long as tariffs are not rebalanced, the access deficit must be recovered through non-discriminatory access deficit contributions (ADCs) spread across all call minutes that hit C&WJ's Public Switch Telephone Network (PSTN). The net avoidable costs of universal service should be recovered quite separately through a universal service fund.

15. Contribution to Fund

C&WJ agrees with Mr Wright that contributions to the universal service fund should be spread across all telecom network and service providers. C&WJ believes that pegging contributions to revenues is fair and equitable. By so doing the burden on all operators is minimized and the contributions to the recovery of the funding is spread among all the consumers rather than a specific group or type of customer being burdened with the recovery.

Universal service is for the benefit of the entire society and therefore all service providers must contribute to any physical fund or virtual mechanism established to compensate Universal Service Providers.

14. Services to the Disabled

C&WJ already voluntarily offers specific services to the disabled, and some of the new interactive interfaces it has developed are also conducive to use by disabled persons.

Access to 114, the national directory enquiry service is provided free to members of the Jamaica Society for the Blind and the national directory is provided on diskette to the Society. C&WJ is also pleased to say that all its payphones facilitate use by the disabled.

DQ Enquiry is available as an interconnection service in Cable & Wireless Jamaica's Reference Interconnect Officer (RIO) and is available to any Service Provider. C&WJ believes that the service currently offered goes a long way to meeting the needs of the disabled and does not believe that further requirements will be necessary, although the Company will continually review its service offerings that are particularly useful to the disabled.

16. Review of Spectrum Policy

Georgia Gibson-Henlin has contributed an interesting submission in response to the OUR's consultation suggesting a review of spectrum policy in Jamaica. C&WJ believes that any review of spectrum policy would raise a number of important issues apart from its implications for universal service provision, and therefore would need to be the subject of an entirely separate proceeding.

Ms. Gibson - Henlin had included in her submission a table indicating wireless and wireline distribution for C&WJ. C&WJ however is not aware of the source of the information and therefore is unable to comment on its veracity. However, less than 2% of C&WJ customers are served by Wireless in the Local Loop (WLL).

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