



Submission
In Response to
Consultation Document
“Price Cap Plan for Cable and Wireless Jamaica”

Redacted version

Table of contents

1. INTRODUCTION.....	3
2. “BASIS FOR MAINTAINING PRICE CAP REGULATION FOR C&WJ AND THE OUR’S COMMENTS ON C&WJ’S PROPOSED PLAN MODIFICATIONS”⁴	
2.1. PRICE CAPPING AND WHOLESAL SERVICE.....	4
2.2. UNIVERSAL SERVICE.....	4
2.2.1. <i>Voice</i>	4
2.2.2. <i>Internet</i>	6
2.3. COMPETITION AND ANTI-COMPETITIVE BEHAVIOUR	7
2.4. INTERNATIONAL DATA SERVICE	7
2.5. INTERNATIONAL OUTGOING CALLS & WORLDTALK.....	8
2.6. INTERNATIONAL INCOMING SERVICE REVENUES	8
2.7. LEASED LINES AND INTERNATIONAL DATA SERVICES	9
2.8. SERVICES PROVIDED TO BUSINESS CUSTOMERS	10
2.9. CHANNELIZED T1	11
2.10. PROMOTIONAL DISCOUNTS	11
2.11. NOTICE FOR PRICE CHANGES	12
2.12. COST OF CAPITAL	12
3. CONCLUDING REMARKS	12
4. THE OUR’S SPECIFIC QUESTIONS.....	14

1. Introduction

Digicel is pleased to participate in another OUR consultation process. Digicel believes that through consultation stakeholders can help to shape the landscape of Jamaica telecommunication industry. On this basis Digicel urges the OUR to seriously consider all responses received.

The succeeding comments are not exhaustive and Digicel's decision not to respond to any particular issue raised by the OUR or any party does not necessarily represent agreement, in whole or in part with the OUR's or that party's position on these issues,; nor does any position taken by Digicel in this document mean a waiver of any sort of Digicel's rights in any way. Digicel expressly reserves all its rights. Any questions or remarks that may arise as a result of these comments by Digicel may be addressed to:

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2. “Basis for Maintaining Price Cap Regulation for C&WJ and the OUR’s Comments on C&WJ’s Proposed Plan Modifications”

2.1. Price Capping and wholesale services

The regulation of access to upstream (wholesale) bottleneck services is a legitimate and occasionally necessary area of regulation. However, price capping is generally not suited to upstream wholesale services. It was designed for retail price controls for monopolised services.¹

Digicel considers that price capping of very different upstream services, such as (i) partial private circuits and (ii) unbundled local loops (ULL), by placing them into the same price capped basket should not be attempted. One obvious weakness with doing so is that it would enable a regulated fully vertically integrated incumbent to behave strategically in pricing these services;² something that seems likely to result in unintended negative consequences for the development of competition.

Digicel therefore urges that regulated upstream essential facilities are not placed in a retail price cap or to mix them with unrelated other wholesale services within a wholesale price cap.

2.2. Universal Service

2.2.1. Voice

The rationale for maintaining a price cap plan that involves retail services is to provide a surrogate for competition where competition is not possible in the near to medium term. Such regulations are typically reserved for monopolists and near monopolists. The main reason for this are that price capping is an aggressive policy and in many cases other regulatory remedies are very likely to provide for better sector performance in the medium to long term. It needs to be remembered that price controls tend to make markets unattractive for new entrants to enter and invest in; i.e. markets that are largely monopolised are more likely to remain so if retail price controls are administered.

¹ Where there are several jointly purchased cost elements involved in the provision of access to an essential facility which have been costed or priced separately, it can make sense to place these elements within a price-capped basket. We have seen this done with interconnection for example when following 2 years of cost analysis in 1995 Oftel placed the various elements into a price capped basket to apply to BT.

² For example, if C&W considered that it faced a greater competitive threat in retail market A and B it may choose a larger reduction in price the upstream wholesale component used to provide B.

A price cap is not a suitable mechanism for pursuing universal service objectives. It is not designed for this purpose and is not an effective remedy to use for the pursuit of universal service objectives. Economic theory and empirical evidence shows that price controls tends to reduce the supply of price capped services. This has occurred in most middle and lower income countries in regard to fixed line access. There is a great deal of evidence showing that maintaining access prices (primarily line rental) at less than the average long-run incremental cost of providing access lines, is a primary cause of low household penetration rates in such countries, i.e. a price cap on line rentals has a negative impact on universal service and not a positive one – as the OUR appears to be claiming as a reason for adopting price cap regulation. In other words, research shows that regulating line rental prices at below cost in order to foster high household penetration rates, has the opposite effect; it causes the under-supply of access lines.³ The reason for this is that incumbent operators have no incentive to invest in growing the access network since new customers will likely contribute as much or more to costs as they did to revenues.⁴

The basic data in Jamaica suggests a match with the supply-side problems found in other countries. C&W's fixed network is focussed on providing service to the well-to-do and moderately well off and is largely an urban network. The data also provides pretty overwhelming evidence that universal service in Jamaica is primarily provided by the mobile networks.^{5,6}

In Jamaica we believe the impetus to switch to mobile from fixed is partly explained by the convenience of personalised phones, the poor quality of service offered by C&W, as well as the long waiting period that applicants must endure – which incidentally is a tell-tale sign of the undersupply of access, caused primarily by too tight a control of access prices.

³ A long waiting time to get a fixed line phone is a key indicator of this supply-side constraint.

⁴ For example, the empirical evidence from South and Central America shows that as line rentals were allowed to raise so too did investment in signing up new customers. However, most middle and lower income countries still have under-developed fixed access networks even after we take into account their lower GDP per capita; a problem that is likely to persist as mobile phone networks are now providing universal service in middle and lower income countries in place of fixed networks.

See for example Ros, R. (1999), "Does ownership or competition matter? The effects of telecommunications reform on network expansion and efficiency". *Journal of Regulatory Economics*, 15: 65-92. And see also Ros, R., and A. Banerjee, (2000), "Telecommunications privatisation and tariff rebalancing: evidence from Latin America". *Telecommunications Policy*, 24, 233-252.

⁵ Digicel believes that a key reason for the reduction in fixed line subscribers is fixed to mobile substitution. It is for this reason that in numerous countries there is a negative correlation between mobile and fixed subscriber numbers. In Jamaica we believe the impetus to switch to mobile from fixed is also partly explained by the convenience of personalised phones, the poor quality of service offered by C&W, as well as the long waiting period that applicants must endure – which incidentally is a tell-tale sign of the undersupply of access, caused primarily by too tight a control of access prices.

⁶ According to the OUR one of the factors that has caused the decline in the number of fixed line subscribers is the relatively high rate of bad debts which it thinks is partly due high fixed to mobile calling rates. We have serious doubt about this since it seems to suggest that a prepay system for fixed line service (the vast majority of Jamaicans use a prepay service for their mobile phone) would reverse this trend. The reasons for the decline are likely to be numerous but Digicel suggests that competition especially from mobile, it probably the most important.

In Summary, Digicel contends that the evidence shows that mobile operators are the primary providers of universal service in Jamaica, not the fixed network; and the evidence suggests that price controls on access services is a major cause of the under-supply of access services to Jamaican households. Price capping is not positively related to universal service, rather it is an important cause of universal service problems.

2.2.2. Internet

The OUR goes on to discuss the role of broadband access in providing universal access to the internet. It says,

“Although access to the Internet backbone has become more competitive, the retail market for internet access is still controlled by C&WJ with an estimated market share of about 92% as at September 2007. This is symptomatic of the limited competition at the wholesale level and the relatively slow role out of competitor services”.

We wish to remind the OUR that 3 to 4 lots of 2.5Ghz spectrum is supposed to be licensed in Jamaica in the near future. Digicel applied for this spectrum in early 2006, but was informed by the SMA that the spectrum was not available. Since then Digicel has lobbied the SMA and the GOJ for the release of this spectrum. The 2.5Ghz range is the spectrum range within which broadband WiMAX wireless networks and services are provided.⁷

The businesses other than C&W that obtain these licenses will be completing head-on with C&W in the provision of internet access and service provision in Jamaica. This along with regulated access to C&W's upstream wholesale ISP service, and the growth in FLOW's fibre-coaxial access network, ought to make the regulation of wholesale access to C&W's xDSL access service at the DSLAM unnecessary – indeed, counterproductive.

What is more, in regard to internet access, Digicel is firmly of the view that providing liberal licensing conditions enabling commercial WiMAX service provision is the superior regulatory policy remedy for a lack of competition in from access at a fixed location. It would preclude the OUR from having to get involved in regulating wholesale internet access to end-users and foster infrastructure competition – practically the best of all outcomes. Along with the OUR's plans to have C&W make available unbundled local loop (ULL), Digicel believe the bottleneck in the “last mile” will very soon be a thing of the past in Jamaica. Between them – WiMAX and ULL and FLOW's triple play – would provide the majority of subscribers in Jamaica with alternative access to voice and internet services at a fixed location.⁸

⁷ Clearly the licensing criteria needs to be sufficiently permission and not so onerous as to make it commercially unviable for WiMAX networks to roll out in Jamaica; which Digicel suggests is the current situation regarding the proposed/existing 2.5GHz licensing rules.

⁸ Digicel has plans (on hold) to included additional infrastructure which would enable voice handover such that WiMAX would become a genuine 4G technology.

Digicel believes that the OUR's proposed policy of regulation access to C&W's internet users by imposing access conditions to C&W's DSLAM would not be in the public interest as competition can be expected to solve this problem. Digicel can point at Cayman as a prime example of what competition will do. On September 27th, 2007 Digicel launched the Caribbean's first Mobile WiMAX network in Cayman where Cable and Wireless enjoyed a 85-90% market share. Digicel's WiMAX offering managed to grab █% within 180 days of launch and is aiming to become market leader during 2009.

The view expressed by the consultation suggests a view of the sector that is rapidly being overtaken by developments in new technology and planned and actual investment and as such the consultation sends the wrong signals to investors in alternative broadband access facilities.

2.3. Competition and Anti-competitive Behaviour

Digicel wishes to reiterate the importance of a forward-looking approach to regulation. In our view the OUR's requirements that, "*in aggregate, other competitors have capacity in place to meet a large portion of the total output of the relevant market*" needs further words to be added like, "*or that the entry barriers, available technology, and other pertinent factors, suggest that this capacity will be in place in the medium term future*".

Furthermore, the tests outlined in this section of the Consultation can fail if existing laws, regulations or licensing rules would prevent competitive investments from being undertaken, which, for example, we believe is a distinct risk in regard to 2.5GHz spectrum licensing (discussed above).

Digicel suggests that even if investigation suggests a negative answer to each of the 3 tests identified in paragraph 2.5, this does not constitute sufficient evidence for a price cap to put in place.

2.4. International Data Service

At a wholesale level international data services is an area that lacks effective competition.

All internet service providers – Digicel is one of these – need to provide for service resilience. Therefore we must have more than one upstream ISP from which we get internet connectivity, and at more than one point. Digicel thus has one connection point in Miami where we buy connectivity, but we must also buy connectivity from C&W in Jamaica. We pay \$J█ per Mbit per month to C&W; in the USA the rates per Mbit are under \$J█ per month and under \$J█ if the purchase is large enough. We do not have any choice but to pay the rate C&W asks!

Although Digicel considers that it is important to address these problems, it is not a problem that the OUR should attempt to address by placing the wholesale service into a price capped basket with other wholesale or with retail services for reason we outlined

near the beginning of this document. Even the specific control of C&W's wholesale interconnect connectivity service may not be the best way to address the problem if there are other less obtrusive regulations that would enable competition to help solve this problem, i.e. to enable downstream ISPs like Digicel to secure the necessary network resilience.

Digicel suggests that the OUR look into the excessive pricing of wholesale internet connectivity in Jamaica and the factors that enable it to continue. This will aid the OUR to design and target the most appropriate remedy.

2.5. International Outgoing Calls & Worldtalk

Digicel contends that there is no separate market in Jamaica for international outgoing calls from fixed locations.

Given that many more people in Jamaica have a mobile phone than a C&W or FLOW fixed phone, and a large number have both fixed and mobile, there appear to be ample substitution possibilities on the margin between fixed and mobile originated international outgoing calls.⁹ Digicel suggest that there is but one market – “international outgoing calls from Jamaica”. This will include calls from fixed lines, mobile phones and VoIP calls. Indeed, the technology is increasingly pointing toward VoIP calls taking shares from fixed and mobile. In this market no firm is dominant and thus no retail price regulation is justified.

In addition Digicel wishes to point to the fact that broadband WiMAX services provided by the 3 or 4 new WiMAX network works that the authorities plan to license in the near future will add to this competition. Future WiMAX subscribers will be making international outgoing calls from a fixed location. WiMAX service providers will thus be competing in the provision of international outgoing calls with C&W's and FLOW's fixed line service. They will also be competing with a very similar service provided by the mobile network operators (MNOs). The evidence suggests that “fixed line” / fixed call definitions are increasingly out of date.

2.6. International incoming service revenues

In the past it was important for regulators to address the area of incoming international calls as this was a monopolised service. Even in otherwise liberalised countries it was for a long period a market that could only attract competitors if there was specific supporting regulation.

The USA and the UK, for example, imposed a proportionate return rule in order to allow for some level of competition for the provision of incoming international calls. Now that the international sectors of many countries are liberalised this is no longer a workable regulation in liberalised countries. In countries where there remains a monopoly for

⁹ Even if prices differ between services provided by different network technologies, if on the margin the substitution possibilities are real for enough customers, the services will be in the same market.

bringing into the country incoming calls from abroad, liberalised countries have insisted on lower international transit and termination charges in order to keep net out-payments to foreign operators at a reasonable level.

The situation for international calls in Jamaica is liberalised. Digicel currently collects from abroad for than half of the calls that are for termination on its Jamaican network. The remainder are brought in by other providers and sent to us through an interconnection link. It also appears likely that a percentage are presented to us as domestic calls such as can occur through break-out from a PABX situated on a network in Jamaica in which calls come into the PABX via alternative means.¹⁰ Furthermore, an increasing number of VoIP calls terminated via IP devices.

Other licensees in Jamaica face a similar situation although with some notable exceptions in regard to C&W.¹¹

Network operators abroad that originate calls for termination in Jamaica have every incentive to find the cheapest way possible to have the calls delivered and terminated in Jamaica. In the markets originating large volumes of calls for termination in Jamaica the network operators employ an array of technical and networking options offered by the markets in which they compete, to get the calls to handover points in Miami and Kingston, and if it results in lower charges, to any other jurisdiction that has links into Jamaica. Further more, international *refile* via 3rd countries is now a substantial arbitrage business all around the world and provides further downward pressure on incoming call prices.¹²

Digicel submits that the market for incoming calls for termination in Jamaica, like the market for international outgoing calls, is subject to competitive pressure.

2.7. Leased Lines and International Data Services

There is significant competing infrastructure providing international capacity to and from Jamaica. C&W and Fibralink are now operating cable systems into Jamaica. Apparently Trans-Caribbean Cable Company has a license to roll out an undersea cable to Jamaica in the near future although there is no sign as yet that its plans are being acted upon. Digicel also owns a satellite earth station while C& W owns two stations and there are numerous private VSATs (Very Small Aperture Terminal) operating in Jamaica.

¹⁰ Many if not most of these calls are likely to be illegal in the sense that they bypass the official system and do not pay the USO tax.

¹¹ C&W has constructively refused to reach an agreement with Digicel to pass toll free traffic over its network despite Digicel agreeing to CW rates.

¹² Indeed, in the early days in which this strategy was starting to become popular some well placed incumbent networks were offering this service to developing country incumbents as a way for them to get some of their traffic into liberalised countries at much reduced rates. We have experience from 2001 of representatives of Belgacom (the Belgian incumbent) travelling throughout north and western Africa offering a *refile* service for international calls

In addition to these we need to consider the roll of IRUs (Indefeasible Right of Use).¹³ IRU capacity can be subdivide and re-let and should be seen as providing competitive capacity “as if” it were competing infrastructure.

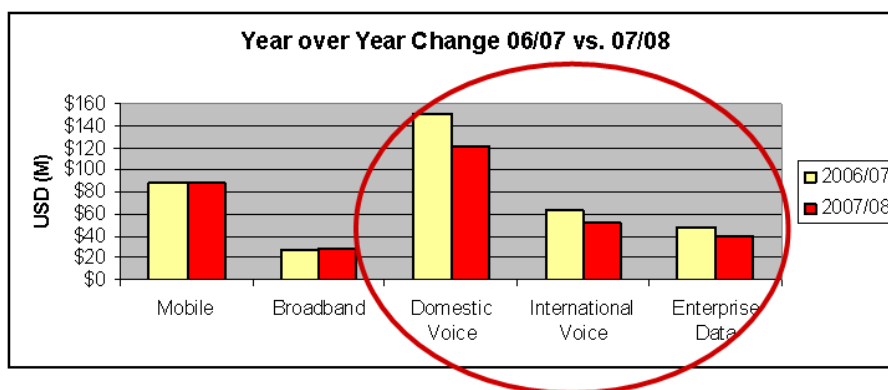
Digicel purchases IRUs and is looking to lease excess capacity to corporate entities that require an International Private Leased Circuit. The price regulation of C&W international leased lines services will undermine Digicel’s and other firm’s such as FLOW’s incentives to enter this market.

In light of the abovementioned Digicel asks the OUR to refrain at this time from regulating C&W’s international leased lines services.

We have discussed internet services above. If we understand correctly the subject the OUR is addressing here, data services are covered under “internet” discussed above.

2.8. Services Provided to Business Customers

Digicel competes to provide voice, data-networking and broadband services to businesses. Digicel has approximately █% market share already, almost all obtained from C&W in the last 1½ years. If we compare C&W Jamaica’s annual report from 2006/2007 with the results from 2007/2008 one can see a decline of 16% or US\$47M form the areas of Domestic Voice, International Voice and Enterprise Data where Digicel and FLOW now compete with C&W (see the figure below). The fact is, the only area of slight growth for C&W during this period was in its broadband business; and with 3 to 4 licensed WiMAX providers coming onto the market in the next year to 18 months Digicel suggests that this market can be regarded as competitive.



Source : <http://www.cw.com/images/pdf/results-2007-08-annual.pdf> (page 27)

¹³ IRUs are capacity purchased on a submarine cable after the original owners have concluded a Construction and Maintenance Agreement (C&MA). Often IRUs are purchased after the cable system has come into service and there is excess capacity available. IRUs are indefeasible, the capacity is not returnable and operating and maintenance costs are an obligatory element of such contracts. The capacity can be resold or leased to other parties.

2.9. Channelized T1

In the near future Digicel intends to provide leased line services in competition with C&W and FLOW. Digicel sees no reason why channelized T1 leased circuits should be regulated differently from other leased lines services.

2.10. Promotional Discounts

There are two related points of concern here:

1. The need to avoid putting in place an additional incentive in favour of C&W strategically discounting certain services with the intention of discouraging competition, and
2. Where C&W is providing a wholesale service to competitors and discounting the price of a service in a downstream market which uses this input in which it faces competition. The risk that exists in such cases is that the retail discounts impose a margin squeeze on the downstream competitor.

In the case of (1) above where competitors are not buying an upstream input from C&W (i.e. there is no possibility of a margin squeeze), the service that C&W would strategically discount with anticompetitive intent needs to be one where entry and investment and competition can reasonably be prevented, delayed, or minimised by C&W's strategic discounting. Potential third party investors would need to view the situation as one where C&W would be able and willing to engage in a sustained predatory pricing campaign. For C&W to be able to commit to this strategy theory suggests that C&W would need to have the deepest pockets and to believe that it would be permitted to behave in this way by the authorities – otherwise investors are likely to see the strategy as a bluff. Digicel does not think that the factors that would enable C&W to commit in practice to engage in strategic anticompetitive discounting exist in important markets in Jamaica and thus we feel that if a retail price cap is to apply to C&W, discounts can be included in the price cap.

In relation to (2) above, the situation in Jamaica regarding the prevention of margin squeezes has been unacceptable. Digicel believes that the risk of margin squeezes where C&W is selling wholesale inputs used by its competitors to compete downstream with C&W, strongly suggests that discounts for such retail services should not be included in any price cap. This of course does not prevent a margin squeeze but it does prevent C&W being rewarded twice for undertaking such anticompetitive strategies, i.e. obtaining an anticompetitive effect and at the same time being able to have discount counted toward the weighted average price restriction imposed by a price cap.

Any price cap that is placed on a group of elements that make up a wholesale service, discounting would have no obvious place, unless perhaps this wholesale service was

subject to competitive entry – in which case it ought not to be in a price cap. However, the same lack of conditions needed for it to be a credible strategy as discussed for retail service above, would likely apply here also.

However, what can be effective is where the discounts are provided to “meet the competition” in that part of the market that is subject to competitive entry, and to retain higher prices in that part of the market that is not subject to competitive entry. This type of strategic discounting strategy has a better chance of being effective. Thus, discounts that are targeted to a very specific group that is much less than “all buyer of the service”, should not be included in any price cap.¹⁴

2.11. Notice for Price Changes

We believe 7 day notification will provide some help in preventing cases in which strategic price discounting would otherwise be adopted by C&W (e.g. those discussed in the last paragraph above). Digicel believes that if a retail price cap is applied to certain service provided by C&W, then the present system of notification is appropriate.

2.12. Cost of Capital

Digicel has commented previously (20th June, 2008) on the cost of capital and this remains Digicel's position on the topic – see “*Submission in Response to the OUR's Consultation Document, 'Estimate of the Weighted Average Cost of Capital for Cable and Wireless Jamaica'*”.

3. Concluding remarks

Digicel recommends that the OUR investigate further the markets in which it thinks it might regulate C&W's retail prices, which in the absence of such regulation today, may become competitive in the short to medium term. Digicel urges the OUR to employ a forward-looking approach as this will assist in providing an appreciation of the technology that may not yet be on the market but will be shortly. New technologies have the potential to force open presently monopolised markets. In this regard it is understood by regulatory economists that aggressive regulation of markets that are potentially competitive will undermine the future development of competition in those markets. Price regulation, for example, is understood to be one of the causes of long term market monopolisation. For this reason we believe that the prudent thing for the OUR to do will in some cases be not to price regulate where it is presently planning to do so. Patience may be what is required along with the withdrawal of any regulations that work against such a solution. But this can result in investment by infrastructure competitors – the best of all solutions.

¹⁴ Such practices may represent an anticompetitive predatory strategy by C&W. Where competition law is not highly developed, as in Jamaica, it is normal practice for regulators to put in place a rule that prevents the incumbent from offering narrowly targeted discounts due to the high risk of them being anticompetitive.

Such an approach relies on the price mechanism to orchestrate investment, a task it generally does very effectively. Indeed, this is understood to be the main reason why market based economies have been so economically successful. When prices (profits) are high new investment and competition is attracted to the market which has the effect of reducing prices and profits to 'normal' levels. This process tends to take time to occur – perhaps one year but often two. Regulators need to allow time for this process to work. With regulatory forbearance and good spectrum licensing practice, Digicel believes that with regulatory forbearance and good spectrum licensing practice C&W's market power in the provision of fixed line services (internet and voice) will quite substantially disappear over the next few years. Regulatory forbearance is in this context the prudent strategy.

To Digicel the Consultation document conveys the idea that inclusion of a service in a price cap is sometimes the first line of regulation to be imposed by the OUR if it considers that a market is not effectively competitive. The OUR does of course regulate other sectors which are not subject to competition so this is to some extent understandable. Digicel stresses that retail price controls should be rare and should only be imposed if there are no less aggressive remedies available that would provide a solution to the problem. Price controls are a very aggressive remedy. Price regulation – particularly in a retail market – is rarely a prudent regulatory policy where competition in the sector is evolving.¹⁵

We also note that price capping is not a mechanism that is generally well suited to the regulation of upstream wholesale prices. If C&W owns facilities which can not be by-passed by competitors through the use of new technologies, then regulated access to these facilities should be considered and not the price regulation of down-stream retail markets. Access to these upstream facilities should generally be regulated quite separately to retail price capping.

¹⁵ The European Regulators Group (ERG) states, "*The problem with imposing obligations at the retail level is that given it is only appropriate to impose such obligations where obligations at the wholesale level are not effective*". ERG (06) 33, Revised ERG Common Position on the approach to Appropriate remedies in the ECNS regulatory framework, Final Version May 2006, p.49.

4. The OUR's Specific Questions

Question 2.1

Is the wholesale ordering process for xDSL transparent and free from intervention by C&WJ's Carrier Services Division or its retail Division? Please provide a detailed response.

Digicel cannot speak definitively to the transparency of C&W xDSL ordering process. However, we stress that soon to be offered WiMAX services by 3 or perhaps 4 competitors are highly likely to make price capping of C&W's xDSL services the wrong thing to do at this time.

Question 2.2:

Do respondents believe that international outgoing calls and other similar services should be removed from the regulated services basket? State the reasons (along with available traffic and other data) for your response.

Yes, please see section 2.5 above

Question 2.3:

Should international leased lines be removed from the regulated services basket? Where possible, provide data to support your response.

Yes, please see response in section 2.7.

Question 2.4:

Should any service provided to business customers be removed from the regulated services basket? If yes, provide data to support your response, defining the relevant markets and the conditions of market entry and exit.

Digicel believes that all services to business customers should be removed from the price cap plan. For further illustration see section 2.8 above.

Question 2.5:

Do respondents believe that promotional discounts should be included in determining price cap compliance? Provide reasons for response.

In some cases yes, but not where: (i) they are narrowly targeted, (ii) where there are market competitors who buy an upstream input from C&W. Please see the response in section 2.10

Question 2.6:

Do respondents agree with the proposed change in the notice period given for a rate decrease? If not, why?

No, Digicel believes that the current notification period is adequate. Please see section 2.11 above.

Question 2.7:

Should international incoming service revenue be removed from price cap regulation? Please justify your response using relevant data.

Yes, please see section 2.6 above.

Question 3.1:

Is a four-year Plan (commencing April 1, 2009) appropriate for the next Price Cap Regime? If no, provide reasons to justify your response.

Except for the first price cap four years is usually considered the minimum period for a price cap. However, Digicel believes there are few if any telecommunications services that should be price capped at this time.

Question 4.1:

Do you agree with the proposed set of quality of service standards and associated conditions? If not, state why.

Quality of service is a competitive parameter and one which Digicel has used very effectively to enter new markets. Unless the service is clearly not going to be subject to competition in the near to medium term Digicel believes the quality of service should be left to competitors to decide on.

Question AI.1:

Given regulatory intervention and changes in market conditions, should toll free services and D-Slam ports be included in the basic services basket? If yes, justify any proposed adjustments.

No – but C&W strategies that undermine the ability of competitors to provide these services must be vigorously pursued.

Question AI.2:

Are there any additional adjustments to the service classification that are necessary? If yes, justify any proposed adjustment.

Digicel believes that most of the service that are currently priced cap ought to be removed from any future price cap. We invited the OUR to look into the likelihood that significant competitive provision of substitute services can occur in the next 12 to 24 months. Where this appears likely given any licenses and regulatory modifications to allow it, Digicel urges the OUR to withdraw these service from the price cap.

Question All.1:

Do you agree with the proposed set of imputation test rules? If no, explain.

Digicel has no comment at this time on the OUR's proposals regarding imputation tests.