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**Supplementary Consultation for the Cost Model
for the Assessment of Fixed Infrastructure Sharing Rates**

**Question 1: What are your views on the figures presented in Table 1 above?
Please provide reasons inclusive of any data or other relevant evidence to
support your response. Also, please indicate any additional disaggregation in the
network elements (e.g. considering different configurations) present in your
Network.**

The CACU considers this area to be the domain of the network operators to give a response based on their operations.

**Question 2: What are your views on the figures presented in Table 2 above?
Please provide reasons inclusive of any data or other relevant evidence to
support your response and, if applicable, the useful lives that you consider
appropriate to be included in the Fixed Infrastructure Sharing Cost Model.**

This is another area directly in the domain of the operators. The CACU notes that following cursory observations:

- 1. Wooden poles and concrete poles are assigned that same useful life.*
- 2. A landing station with only 20 years of useful economic life seems unusually low.*

- 1. All documentations I have read have provided different useful life and the challenges with both.*
- 2. I concur that most of the useful life seen is much longer than 20 years - It is important to look at the source of the information and it would be useful for references to be provided. It appears also that different treatments are available to extend the useful life.*

“A survey of 150 utility companies found the average service life of utility poles to range from 25 to 37 year” One of numerous document reviewed. Source of information is important.

[How Long Will Utility Poles Last? \(hanspolebuildings.com\)](http://hanspolebuildings.com)



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Question 3: What are your views on the percentage of fully depreciated assets included in the draft Model? Please provide reasons inclusive of any data or other relevant evidence to support your response and, if applicable, the percentage you consider appropriate to be included in the Fixed Infrastructure Sharing Cost Model.

*While the CACU will again defer to the operators for their response, it is not apparent where the document has included the actual figures of the **percentage of fully depreciated assets included in the draft Model.***

Cornell University did a complete study on this subject, but to inject portions of that here may not add value to the discussion.

Question 4: What are your views on the inputs concerning staff-related costs? Please provide reasons inclusive of any data or other relevant evidence to support your response and, if applicable, the figures that you consider appropriate to be included in the Fixed Infrastructure Sharing Cost Model.

The CACU agrees that staff related costs are to be included.

It is logical that the cost of staff (labour cost) will contribute to the overall cost of installation and maintenance of the poles.

Question 5: What are your views on the figures considered for unit costs for landing stations? Please provide reasons inclusive of any data or other relevant evidence to support your response and, if applicable:

- i. the unit costs that you consider appropriate to be included in the Fixed Infrastructure Sharing Cost Model; and**
- ii. any costs related to landing stations that should, in your view, be considered in this calculation.**

The proposed principle for including the cost of landing stations seems reasonable. Again it is not clearly indicated where those figures are in the document.

Whilst we may not see the cost of the landing stations, it is an essential component to allow workmen to splice and perform maintenance work thus, it should be included in the cost.



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Question 6: What are your views on the figures considered for the percentage of aerial cables? Please provide reasons inclusive of any data or other relevant evidence to support your response and, if applicable, an alternative percentage that you consider appropriate to be included in the Fixed Infrastructure Sharing Cost Model.

*It is public information that the mobile companies have laid fiber underground. The CACU hopes that the operators are willing to share information regarding the same.
<https://nearshoreamericas.com/digicel-begins-build-underground-fibre-network-jamaica/>*

Question 7: What are your views on the figures considered for the network inputs presented in Table 3 above? Please provide reasons inclusive of any data or other relevant evidence to support your response and, if applicable, the network parameter figures that you consider appropriate to be included in the Fixed Infrastructure Sharing Cost Model.

The CACU considers this area to be the complete purview of the network operators

Question 8: Do you consider that there are any additional ancillary services that should be included in the Fixed Infrastructure Sharing Cost Model? If yes, please describe such service(s), and provide detailed information on the labour and material costs associated with these service(s).

The CACU notes that the mobile operators should highlight any additional ancillary services required