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UPGRADE VINCY

Ref: LIME/ntrc44.15

30 April 2015

Mr. Apollo Knights
Director / Secretary
National Telecommunications Regulatory Commission
Upper Bay Street
Kingstown

Dear Mr. Knights:

Re: Public Consultation on Recommended Price Cap Plan

Cable & Wireless St. Vincent and the Grenadines Ltd, trading as LIME ("**LIME**") thanks the Commission for the opportunity to submit the following comments in response to the Consultation Document "Recommended Price Caps Plan for the Regulation of Price Capped Retail Services Provided by LIME", issued by the Commission on 31 March 2015 (the "**Consultation Document**"). Failure to address a given issue raised in the Consultation Document should not necessarily be construed as LIME's agreement with the position taken on that issue.

General Comments

With the one exception described further below, LIME believes that the Commission should adopt the Price Cap Plan (the "**Plan**") as agreed between LIME and ECTEL and attached to the Consultation Document. It should be noted that we do not agree with all of the conclusions drawn by ECTEL with respect to the definitions of the relevant retail markets. In our view, ECTEL's own arguments demonstrate that mobile services represent

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a strong constraint on LIME's fixed line pricing and, given recent advances in mobile broadband (for example, the roll-out of 4G services) and high mobile penetration (121% in St. Vincent and the Grenadines as of 2013, according to ECTEL's most-recent Annual Sector Review), regulating fixed prices is no longer necessary. Notwithstanding this, we appreciate the steps taken by ECTEL to move in this direction and to simplify the Plan.

Bridge Period

Because of the passage of time and because the current Price Cap Plan was extended, the use of a Bridge Period between 15 January 2015 and 31 March 2015 is no longer applicable. It would also be difficult to comply retroactively with requirements under the Plan that apply to the Bridge Period. Instead, LIME recommends that the effective date of the 2015 Plan be applied retroactively at the conclusion of this proceeding to 1 April 2015, which would eliminate the need for a Bridge Period. Rules 1.1 and 1.2 would read as follows:

RULE 1 – DURATION AND TERM OF PCP

1.1 Effective Date:

The 2015 PCP takes effect on April 1, 2015.

1.2 Duration and Periods:

The duration of the 2015 PCP is 3 years and shall expire on March 31, 2018.



The 2015 PCP consists of the following time periods:

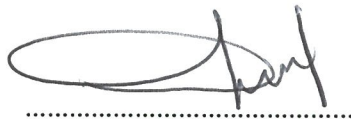
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|--------------------------|---------------------------------|
| a) First Annual Period: | April 1, 2015 to March 31, 2016 |
| b) Second Annual Period: | April 1, 2016 to March 31, 2017 |
| c) Third Annual Period: | April 1, 2017 to March 31, 2018 |

The removal of the Bridge Period would also lead to consequential changes in a few other rules which reference the Bridge Period. These include:

- Rule 7.2 – deletion of the second sentence;
- Rule 8.2 – deletion of the second sentence;
- Rule 9.1 – deletion of the second sentence;
- Rule 13.3 – deletion of the second paragraph; and
- Rule 13.4 – deletion of the last paragraph.

LIME reserves the right to comment on any comment received by the Commission on this Consultation Document. In the meantime, please do not hesitate to contact the undersigned if you should have any questions.

Yours sincerely,



Wayne Hull

General Manager (Ag.)

cc Mr. Embert Charles, Managing Director, ECTEL

