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March 10, 2009

Ms. Sandra Sealey
Director of Utility Regulation
Fair Trading Commission
Manor Lodge, Lodge Hill
St. Michael, Barbados

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REP.	
OFF.	
DATE:	April 03/10/09

Comments on Consolidated RIO

Dear Ms. Sealey,

We have examined the draft Consolidated RIO prepared by LIME. We believe this document should reflect current Government policy and past rulings by the FTC, and provide for the competitive operation of all licensed carriers in a fully liberalized telecommunications environment.

Blue wishes to highlight several areas:

(1) Service Descriptions

We believe the draft is deficient as there is no Service Description for Outgoing International Call Termination from PSTN and PLMN. As two-stage dialing and equal access have both been mandated by Government, these sections must be added in order for the draft to cover all available services.

In addition, Blue has been authorized by the Telecommunications Unit to obtain a CIC code and has been issued 1011258 on March 6, 2008 by NAMPA. We therefore require that CIC code access be addressed in the draft.

See Appendix A for supporting documentation.

(2) Service Descriptions – Sections 1.5.3, 2.5.3, 3.5.2 and 4.5.3

There is an annotation next to Call Duration Charges which refers to an “Access Deficit Charge”. The Access Deficit Charge was specifically prohibited by the FTC in its ruling of October 28, 2003 and should be removed from the draft.

See Appendix B for supporting documentation.

(3) Service Descriptions – Sections 3.2.2

The draft states “The Service Taker will not convey Incoming International PSTN Termination Calls pursuant to this Service Description addressed from number ranges within countries with whom the Service Taker does not have a correspondent relationship.”

RIO III clarified that calls may be conveyed through another correspondent relationship which may specifically allow the conveyance of calls from that Third Party International Telecom Provider. This has been left out and should be reinstated.

(4) Tariff Schedule – Schedule 6, Part 2

All of the proposed costs for interconnection are based on historic costs estimated in 2003. Cost-based services have been mandated by the FTC, specifically requiring LIME to break down component costs to their lowest common denominator. Blue believes that an examination of current costs in light of ever improving network efficiencies and falling equipment prices will result in significant downward adjustment in the interconnection components specified in the Consolidated RIO.

Specifically, call setup charges were historically based on stepping and crossbar switching technologies which no longer exist in LIME’s network. Modern SS7 and IP networks have call setup costs so negligible as to have been eliminated in other jurisdictions, including Jamaica in its RIO 5A1. We therefore recommend the call setup charge of \$0.0402 to PSTN and \$0.031 to PLMN be eliminated.

Similarly, transit charges have a negligible cost in modern networks, as evidenced by a recent decision in Trinidad to reduce transit charges to less than US \$0.003. We therefore recommend the transit charge to third party PSTN and PLMN of \$0.011 also be examined.

See Appendix C for supporting documentation.

We have attached additional documentation in Appendix D so that we may be able to refer to it during oral submissions.

Blue welcomes the opportunity to provide comment on the draft Consolidated RIO and to expand on its views during the upcoming public discussions.

Sincerely,

A handwritten signature in black ink, appearing to read 'ES', with a stylized flourish extending to the right.

Elliot Sachar
President

Appendix A

1. voippolicy.doc
2. Cable and Wireless response to Reliant RIO3.doc
3. Extract from the Barbados Telecom Act 282.doc
4. CIC Award NANP Administration System.doc
5. FTC Reference Interconnection Offer – Phase 1 RIO v1.0.doc
6. Ministry letter 2 stage dialling NOT indirect dated Nov12th2006.pdf
7. Jamaica Two_Stage_Dialling_Determination.pdf
8. Appendix 2 Approved Equal Access and Indirect Access policy.doc
9. Appendix 1 Approved Barbados Two Stage Dialing Policy.doc
10. WTO Annex on telecommunications Formated.doc

Appendix B

1. FTC Decision Reference Interconnection Offer Phase 1 RIO v1.0.doc
2. RIO 1 No ADC Allowed.pdf
3. Jamaca ADC.pdf
4. FTC Interconnection Guidelines Decrypted.pdf
5. Review of Cable Wireless Key points Guernsey.doc

Appendix C

1. ECONOMIC PARTNERSHIP AGREEMENT re Telecom.doc

Appendix D

1. Note of Meeting of the Telecommunication Act Review Committee held on November 09.doc
2. fundamentals_of_convergence Telcordia.pdf
3. eircom's ReferenceRIO.pdf
4. Interconnection Issues In Telecom Sector India.pdf
5. Cost based interconnection article.pdf
6. Blue Cable and Wireless Opening up Interconnection Agreement FEB 2008.pdf
7. Barbados regulation use of International Signalling Point Codes.doc
8. NXX Assignment Guidelines.pdf
9. Ofcom CW Indirect Access DisputeA Direction under Regulation 6.doc
10. Ofcom CW.ppt
11. Ofcom_LocalCallDisadvantgae_c_w.doc
12. MOU between BDS Gvt and CW.pdf
13. Barbados GreenPaperTelecomSecPol1.pdf

14. Cotonou ARTICLE 43.docx
15. Telecoms_Report_Oct_12_06.pdf
16. Ofcoms Strategic Review of Telecommunications.doc
17. 2003-10-07_guide_anti-competitive__conduct.pdf
18. 2003-07-01_interconnection_guidelines.pdf
19. RIO 3 - International - Oral Presentation.ppt
20. AAA_Fair Trading Commission Issues Findings in Fair Competition on Abuse of Dominance Investigation.doc
21. Quotes from Cable and Wireless re British Telecom.doc