

December 21, 2011

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Dear Mr. Archbold

Number Portability: SS7 versus SMPP Signaling

We write further to LIME's letter to the Authority of 19th December entitled "LIME Response to LNP – SMS Protocol". We should like to make a few comments in reply.

We acknowledge LIME's frankness in paragraph 1.1 of its response where it stated that SS7 is the 3GPP SMS signaling standard.

LIME has underlined the time and expense it has incurred in readying itself for LNP. In turn Digicel must underline that we have also devoted significant time to and incurred substantial costs in upgrading our systems for LNP. The work required to ready the Digicel network was completed by Ericsson. Ericsson precisely followed the defined 3GPP standards and at no point was it suggested that the 3GPP standard was the wrong way forward.

LIME makes reference to the routing solution implemented for MNP in Panama. While this may be interesting to note that is no determinant of what routing solution has to be used in the Cayman Islands.

We must strongly contest LIME's claims that "*this behavior*" (with reference to Digicel) is "*inconsistent with an operator with a real interested in implementing number portability*". Digicel has implemented the 3GPP standard for MNP SMS routing and we had expected LIME to do likewise. To our minds the industry standard should be followed except in the absence of a reason to deviate from it. No such reason has been provided by LIME other than it being helpful to LIME's business alone. LIME suggests that Digicel should have sent it technical information or proposals if we wanted to use SS7. We are not clear what we are supposed to have sent to LIME given that LIME's network already supports SS7 signaling.

Digicel did state that a switch to SS7 "*is a pre-requisite for LNP*". This was not a suggestion that MNP could not be implemented by any other means under any circumstances – clearly that is not the case. Digicel's statement reflected the fact that it takes significantly more expense to implement a more complex SMPP approach, rather than a standardised SS7 approach, to SMS MNP routing. Clearly, no rational investor will incur expenditure unnecessarily. The default

position was therefore, and naturally from Digicel's perspective, to stick with the standardized approach that was the simplest and most cost effective to implement.

In order to accommodate an SMPP solution for MNP Digicel will have to undertake bespoke modifications (Digicel Cayman and Panama use different relevant systems in this respect so Panama is no guide here). Digicel has received quotations for this work amounting to approximately US\$100,000. We can provide the authority with a copy of said quotation if required. We are not clear why LIME has redacted its figures or how this can be justified if it believes them to be true and wants to be transparent about its cost claims. It would also be interesting to know how much LIME claims it spent on implementing the SMPP routing approach for SMS MNP – if it were hundreds of thousands of dollars for example it would truly throw in to question on a cost basis alone any justification for an SMPP approach. We can also provide further information on the differences between the Panama and Cayman infrastructure if the Authority wishes.

Suggested Issues with SS7

LIME has made suggestions that there could be problems with SPAM if SMPP is not used. We are not clear why this should be a particular problem given that Digicel operates SS7 SMS signaling elsewhere and has no such issues. We believe that a major part of LIME's cost estimate for using SS7 here could relate to the cost of installing a firewall based on its claim that it will need to control messages in some additional ways if SS7 is used. If this firewall is in fact unnecessary however then most if not all of LIME's claimed cost of using SS7 for MNP routing may vanish.

LIME also suggests that SMS could not be charged for if SS7 is used. Again we are not clear why this should be the case given that a billing record should be generated by each SMS as it enters the LIME network.

LIME has also stated that it has an SMSC platform for value-added services and that these will not work with a SS7 solution. That may be the case, but this is the first time that LIME has raised this issue as far as we are aware. In any event we imagine that any such services are probably offered to a very small number of account holders and that a workaround solution could be found for the small number of people involved if necessary (at least in the interim).

Workarounds

Notwithstanding that Digicel feels it has done everything it reasonably can and should have done to implement SMS routing within MNP, and in a spirit of possible compromise, we are investigating if there is any possible workaround which might enable us to deliver SMS using an SMPP solution. Especially given that LIME claims that it is operating services for some of its customers that it could not provide with SS7 signaling. In turn we ask that LIME investigate possible workarounds of its own to see if it can implement SS7 signaling functionality to facilitate the SMSC interworking.

Should any party be required to make amendments to its network to overcome SMS routing issues in this instance, we suggest that, under the circumstances, and exceptionally, those costs should be shared amongst the consortium members affected.

In either case we believe that it will now be extremely challenging, if not entirely impractical, to meet a deadline for LNP implementation of Jan 31st 2012. For example, Digicel's vendor has indicated a timeline of up to three months to implement a proposed SMPP solution and would therefore ask the ICTA to also extend the target date for at least Mobile Number Portability if not Fixed Number Portability as well.

Yours sincerely

"Signed"

Victor Corcoran
CEO