

See below CCT responses to the questions included in the Framework for Market Review:

**Question 1:** Are there other market areas with competitive problems other than those identified under 4.2 that should be addressed through the market review?

We do not see currently any other market areas with significant competitive problems

**Question 2:** Do you agree with the list of market clusters set out in 4.3 for analysis by the TRC?

Basically, the list contains the most significant current market clusters

**Question 3:** Is this the appropriate prioritization of markets for review?

In our opinion, based on the urgency and impact on competition, the prioritization should be changed as follows:

1. Wholesale call termination to specific Caribbean destinations – A formal specific complaint was filed more than 15 months ago. It is imperative to resolve it without delay, given its current impact on BVI competitive arena, including the survival of one of the players
2. International roaming in the Caribbean (retail and wholesale) - A formal specific complaint was filed more than 15 months ago. It is imperative to resolve it without delay, given its current impact on BVI competitive arena, including the survival of one of the players
3. Wholesale International connectivity – In our opinion, without (i) having a clear idea of the capacity available, (ii) guaranteeing a fair and competitive access to the limited available international connectivity, and (iii) setting up clear rules for its usage, including terms and prices, it is going to be impossible to be able to provide a better and cheaper retail internet and other related services in the BVI. This matter is very urgent.
4. Wholesale Call and SMS termination on individual fixed and mobile networks
5. Fixed Broadband Access (and fixed voice services; may include analysis of related wholesale markets)
6. Multi-channel TV services and distribution of broadcasting content

**Question 4:** Do you have any comments on the proposed market definition and analysis procedure?

Our main comment is related to the criteria used to consider a provider as a dominant provider. In our opinion, the TRC should have into account not only the local situation in the BVI market but also, and very importantly, the presence of BVI service providers in other countries, especially in the Caribbean. In calls where a service provider is present at both ends, both in the BVI and in the destination country, that particular service provider is vertically integrated and controls wholesale and retail prices, then been able to implement price squeezing practices, as we understand it is currently happening. Those criteria are crucial in determining dominant positions, especially in the BVI, given the high percentage of our population coming from other Caribbean nations, and, consequently, the high impact on the overall market of any dominance in terms of international and roaming traffics.

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