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## The Bahamas Telecommunications Company Ltd.

January 28, 2011

**Mr. Usman Saadat**  
**Chief Executive Officer**  
**Utilities Regulation and Competition Authority**  
UBS Annex Building  
East Bay Street  
Nassau, The Bahamas

Dear Mr. Saadat,

**Re: Addendum to BTC's submission on URCA's Three (3) Year Strategy  
& Annual Plan (ECS 26/2010)**

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Further to BTC's submission dated January 20, 2011 on URCA's Three (3) Year Strategy and Annual Plan, the company would like these additional points to be considered as the Authority reviews comments from interested parties.

BTC is minded that URCA should give due consideration for the inclusion of the following as part of its list of planned activities for 2011:

- **Review of the Retail Pricing Rules for SMP Operators (ECS 15/2010)**

BTC in its substantive response to URCA's Three (3) Year Strategy and Annual Plan (ECS26/2010) pointed out that the Retail Pricing Rules are quite onerous and in some cases disproportionate to their purpose.

The company is of the view that given BTC's experience with the rules thus far, there is value in an engagement relative to a review of the rules. It is in the interest of both parties (URCA and BTC) to ensure that for all practical purposes, the application of the rules takes into account the need to efficiently utilize resources on both sides.

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Re: Addendum to BTCs Submission on URCA Three (3) Year Strategy & Annual Plan (ECS 26/2010)

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- **Establishment of a Universal Service Fund**

BTC would have provided comments on the initial Public Consultation on the Universal Service Obligations to be imposed on SMP operators, of which there was a discussion on the establishment of a Universal Service Fund. Further, BTC has noted that URCA's plans relative to a USO Public Consultation for 2011 will depend on the government providing greater clarity on various aspects of its universal service policy.

With the liberalization of fixed line services and URCA's plans for an Efficiency Study of BTC in 2011, there is a sense of urgency to establish a Universal Service Fund. The move towards the establishment of a Fund should parallel the discussions on an Efficiency Study for BTC.

- **Wholesale access to television services**

BTC takes the position that Cable Bahamas should be required to provide access to its pay television services by other operators wishing to provide pay television services.

BTC is cognizant that the deadline of January 21 has passed for the submission of comments, however, the company is of the view that the additional comments are of value and that it would be beneficial not only to BTC but to the sector, should generally URCA include them for consideration in planning its activities for 2011.

Should the need arise, please feel free to contact the undersigned.

Yours sincerely,

**The Bahamas Telecommunications Company Limited (BTC)**



Felicity L. Johnson  
Vice President of Legal, Regulatory Affairs & Interconnection  
& Company Secretary