



January 21, 2011

Mr. Usman Saadat,
Chief Executive Officer,
Utilities Regulation & Competition Authority,
Fourth Terrace, Collins Avenue,
P.O. Box N-4860,
Nassau.

Dear Mr. Saadat

Re: Consultation Document ECS26/2010 Utilities Regulation & Competition Authority Three Year Strategy & Annual Plan for 2011 (the “Plan”)

Please find below the comments of Systems Resource Group Limited (“SRG”), d.b.a. IndiGO Networks[®] (“IndiGO”), with respect to the above captioned.

Promoting Competition

SRG notes that rules and regulations for spectrum trading remain unpublished. In the interests of promoting competition, SRG respectfully suggests that early in 2011 URCA publish such rules in accordance with section 38(2) of the Communications Act 2009.

URCA’s Budget

At a time of economic downturn, when businesses are faced with taking aggressive steps to contain and cut their overhead, SRG is concerned that URCA proposes to engage in quite the opposite by instead substantially increasing its overhead in 2011.

With the greatest respect, SRG believes that in the current economic climate URCA’s proposed increase in budgeted overhead of 9.3% over 2010, representing an additional \$449,637, is inappropriate. Like private companies in the sector that it regulates, URCA must be prepared to be seen to be acting in a fiscally responsible manner and avoiding becoming bloated with excessive costs simply because it is able to demand additional funds from sector operators to pay for its excess.

In its response with respect to URCA's plan for 2010, SRG made the following comments:

“SRG's respectful view is that by any measure URCA's budget is excessive, and would certainly not pass muster in a commercial business. Given that it is the commercial operations of a handful of licensees whose largesse must fund URCA, SRG considers that the burden placed on those operators is too high”.

In the circumstances, SRG believes its comments to be equally relevant today in the context of URCA's 2011 budget.

If URCA feels unable to take the step of cutting its overhead like so many in the private sector, then at the very least SRG respectfully urges URCA to exercise fiscal restraint in setting its budget for 2011 to be no higher than that for 2010.

Spectrum Fees

SRG notes that the spectrum fees in the Fee Schedule 2011 are unchanged from the prior year, and are said to be “the same level of fees that the legacy regulator, the Public Utilities Commission (PUC), charged for spectrum”.

SRG has corresponded separately with URCA with respect to charges levied for spectrum fees in 2010 and 2011 that are not reflective of fees charged by the PUC. SRG considers that little would be served by repeating its position in the response to this public consultation. However, SRG should point out that its decision to not respond does not represent agreement by SRG in whole or in part with URCA's past position. SRG reserves the right to comment further at any time and expressly reserves all of its rights.

Yours sincerely,



Paul Hutton-Ashkenny