



June 9, 2020

Mr. Carlton Smith
Director of Policy & Regulation
Utilities Regulation and Competition Authority
Nassau, Bahamas
Via E-Mail

RE: Review of Wholesale Broadband Access Services under Sections 39 and 40 of the Communications Act, 2009

Mr. Smith:

Below please find our comments as it relates to the above referenced consultation document:

Consultation questions – Focus on wholesale DIA services

Q1. Please provide comments on URCA's focus on wholesale DIA services in this preliminary determination. Please substantiate any responses with supporting evidence.

We believe that URCA should have reviewed the DIA Wholesale services several years ago. We are pleased that URCA is finally looking at this critical aspect of competition. We also believe that Local Loop services should be reviewed as well.

Q2. Please provide comments on URCA's market definitions of WBA services as set out above. Please substantiate any responses with supporting evidence.

We agree

Q3. Please provide comments on URCA's reconfirmation of the prevailing SMP designations in the WBA markets in The Bahamas. Please substantiate any responses with supporting evidence.

No Comment

Q4. Please provide comments on URCA's preliminary views on the main competition problems or market failures that could arise from a licensee having SMP in respect of the provisioning of wholesale DIA services.

We agree with URCA on its preliminary views.



Q5. Please provide comments on URCA's preliminary views on the need for ex-ante regulation of wholesale DIA services.

We strongly agree with URCA and believe that all "Downstream" services to Other licensed operators should be regulated as well.

A handwritten signature in black ink, appearing to read "Matthew Carey".

Matthew Carey
President