



August 22, 2017

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PUBLIC UTILITIES COMMISSION

Ms. Dela Britton
The Chairwoman
Public Utilities Commission
106 New Garden Street, Queenstown
Georgetown, Guyana

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SECRETARY'S OFFICE
PUBLIC UTILITIES COMMISSION

Dear Chairwoman Britton,

Re: Application and Review of Order No.2/2017 - In the Matter of a Review of Order No. 1 of 2015 on an application by GTT+ - Review of Terms of Order pursuant to Section 77 of the Public Utilities Commission ('PUC') Act

We write with reference to yours of July 24, 2017. We would like to highlight two issues that are of great concern to us regarding the order and we would like to have the opportunity to clarify these points with you in order to manage the Public Utilities Commission's ('PUC') expectations regarding our ability to comply with the terms of the Order. To that end, in confirming our position outlined in our previous correspondence, pursuant to **Section 77 of the PUC Act**, we hereby apply for the review and amendment of the Order in considering the following terms. As the legislation does allow for GTT+ to be given a reasonable opportunity to be heard, we do hope that this forum will allow for us to articulate our position with evidence to support our position. Where necessary, we would like to rely on our position articulated in our letter to the PUC dated July 11, 2017 as well as the following points:

- i. **GTT+'s Position regarding Order No. 2 regarding the installation of one thousand (1,000) landlines** per quarter. You have referred to a letter dated June 16, 2016 from Pamela Briggs, our former Director of Customer Services who is no longer with the company. In that letter, she made reference to numbers that were generated from a defunct system that was used to capture records of landline applications. The records include aged service applications. The figure overstates the actual demand because the database she relied on has not been cleared or reviewed. The figure of over 19,000 outstanding applications is an overstatement. Many of the applicants among the 19,000 among that number have relocated and have been served at entirely different addresses. Others have died, migrated and lost interest in the landline service given their reliance on mobile for both voice and data services. It is important to note that this information was not part of our substantive pleadings in the application for the increase of landline rates and was not raised as a point of concern when investigations were being done by the PUC subsequent to our hearing for the appeal.

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We no longer utilize this system to support our application and now operate the new Converse system to support our record for landline applications. That being said, the letter that the PUC is relying on to support its position is not an accurate representation of the records of our outstanding landline applications. To that end, we implore the Commission to give us the opportunity to present a current record of pending applications in order for a more reliable and accurate estimate.

ii. **Order regarding the Attendance to Fault Reports.** As it relates to Point (vi) of the Order, we would like for the PUC to consider the following time periods in which the company is able to address faults. In determining the fault times and repairs, consideration must be given to industry standards as what can be achieved in light of the physical terrain of Guyana. That being said, to correct reported wire line faults within 48 hours for all of the regions throughout the country is an overly difficult standard to meet. GTT+ does not have readily available resources in remote areas of Guyana that would allow us to rectify faults within 48 hours. As such, GTT+ believes that the standard should be established for three distinct geographical zones: urban, suburban, and rural/hinterland. To that end, we would like for the formal order to be amended to reflect the following standards for the respective zones are set out below:


- a. In the urban centers, **4 to 5 working days** would be a fairer standard to set;
- b. In the suburban areas **5 to 7 working days** would be more achievable; and
- c. With regards the rural/hinterland areas (Ituni, Mabaruma, Kwakwani, Lethem, Port Kaituma, etc.) where GTT+ has no installation and repair personnel stationed, it is unlikely that a standard less than **15-30 days** would be achievable.

Having raised these concerns with you, we do hope that the PUC will take this information and guidance into consideration so that the Order can be adjusted in managing the expectations regarding compliance with the orders that have been made.

In light of the forgoing, please advise us of a date when we are able to present arguments in support of our position to the Commission in considering the review of this subject order.

We await your urgent response.

Sincerely,



Justin Nedd
Chief Executive Officer
GTT+