

GUYANA CONSUMERS ASSOCIATION
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31st August, 2017

The Chairman
Public Utilities Commission
106 New Garden Street
Queenstown, Georgetown

Dear Madam Chairman,

We refer to GTT's letter of August 22, 2017 which would be the subject of the Hearing on 7th September, 2017.

GTT had "applied for review and amendment of Order No.2/17 in considering the following terms". These "terms" are

1. GTT's Position regarding Order No.2 regarding the installation of one thousand (1000) landlines and
2. Order regarding the Attendance to Fault Reports.

In GTT's "1 ... regarding the installation of 1000 landlines" the caption of their so-called amendment has no relationship to the content in support of it. The content simply said that the figure of 19,000 persons who needed landlines and had not been supplied by GTT is an incorrect figure presented by GTT. It had become incorrect because GTT had delayed so long in installing such landlines that "many of the applicants had relocated, had died, migrated, or lost interest in the landline service". For a telephone company to make such a damning admission of its ineptitude and inability to perform is astonishing. In its submission under its Caption 1. , GTT was merely asking the PUC to substitute a smaller number of outstanding applicants for landline service than the 19,000 they had presented. This is not an application for review or amendment to order 2. as stated on page 3 of PUC Order 2/2017 and should be dismissed as a nullity.

The relevant order 2. of PUC Order 2/2017 requiring installation of 1000 landlines per quarter still stands. In any case, as long as there are 1000 applicants for landlines remaining unserved, the PUC's Order remains effective.

GTT's second "amendment and review" of Order 2/2017 is captioned: Order regarding the Attendance to Fault Reports and asserted it related to "Point (vi) of the Order". There is no Point (vi) of the PUC Order No.2/2017. Since GTT's application for review and amendment was based on a nullity, then the application itself becomes a nullity and must be dismissed by the PUC and the GCA urges that the PUC does its duty in this respect. If however the PUC does not wish to dismiss this application for "review and amendment", then the only segment of Order 2/2017 to which GTT's application may have some tenuous relationship is order 3. of page 3 of PUC Order No.2/2017. This order reads:

3. The Commission finds that GTT has been tardy in their response time and remedial action with respect to fault reporting. To this end the Commission requests a quarterly report from the date the rates take effect showing details of the average time taken to resolve consumers' complaints - residential and business. And for the Company to determine a

daily compensatory credit for consumers which will be contingent on its failure to supply.

GTT, in no way, requires order 3. of PUC Order No.2/17 to be disturbed - the quarterly report and the compensatory credit to consumers still stand and accepted by GTT. GTT are merely asking to have defined the time-frames at which the compensatory credit will take effect. Twinning with this time limit for repairs which GTT is asking to be redefined is the fixing of the quantum of the compensatory credit. Both the time-frames and the compensatory credit are inseparably intertwined and will have to be agreed upon at the Hearing.

GTT has already made its proposals for the fixing of the time-frames. For the compensatory credit we will suggest rent rebate of \$70. per day residential plus economic losses of various kinds - \$130. per day plus inconvenience e.g contacting the Police or a medical help - \$100. per day. This would make a total of \$300. per day for residential subscribers.

Relating to GTT's letter, there is another concern which we would ask the PUC to address:

In July, 2017, GTT circulated an undated letter entitled BLAZE to telephone subscribers wherein they made reference to PUC Order 2/17. In that letter they indicated that they were charging the new rates prescribed in the Order but gave no cognizance whatsoever to the conditions precedent to charging those rates.

These conditions precedent were set out on pages 2 and 3 of the Order and in very abbreviated form were:

We set out herewith the new rates which will take effect from 1st August 2017 and they will be temporary rate subject to the following:

1. GTT must complete...
2. GTT must submit quarterly...
3. The Commission finds GTT has been tardy...

GTT's attempt to partially effect the Order in their own interest was dishonest and they should be ordered to return the monies they would have collected from the increased rates.

Yours sincerely

J. Deonauth MA
Secretary, Guyana Consumers Association