



October 17, 2018

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

Dear Ms. Britton,

Re: Application for the Approval of a Tariff Regime for Access and Landline Metered Charges

We refer to your correspondence dated October 5 and October 11, 2018.

Please note the following explanations below that address the concerns of the Commission *seriatim* as highlighted in the correspondence of October 11, 2018.

1. ATN Shared Services

The cost noted at each of the items highlighted by the Commission in the Cost Allocation Methodology of 2017 represents costs that Atlantic Tele-networks incurred on behalf of the Guyana Telephone and Telegraph Company (GT&T). This includes services for contractors and consultancies to aid the development of the company.

2. Capital Assets

- a. Capital Loss on Exchange stated at GY\$21,499,286,818.00. This should be noted as Outside Plant Expense as expenses to the Network.
- b. Work in Progress stated at GY\$3,925, 259,762.00. Please see the itemized details at Appendix A.
- c. The figure of GY\$1,471,617,254.00 is net of consumer deposits as depicted at page 6 of the 2017 financial statement.

3. Licenses and Permits

The information regarding this request is governed by agreements as to confidentiality; we can state the amounts that are paid to the third parties who are business partners that provide support

to GT&T's business. Also, as this information will be in the public domain, for competitive reasons, we would ask for the forbearance of the Commission in disclosing only the total amount that have been paid to these third parties.

4. Internet Lease Charges

- a. Please see Appendix B outlining the statement being requested by the Commission on this point.
- b. GT&T has contractual arrangements with Atlantic Teleconnection Operating Company and Intelsat in support of internet lease charges. Due to the terms of confidentiality of this agreement and for competitive purposes, we ask forbearance for the Commission on this matter.
- c. Particulars of the financials for the GT&T subsidiaries can be found in each of the financial statements

5. Reclassification of Expense Items in the Financial Statement

Item	2016 and Corresponding GYS Value	2017 and Corresponding GYS Value	Variance	Reason for Variance
Corporate Expenses	3,251,241.00	4,378,185.00	(1,126,944.00)	Increase in licensing and support cost
Customer Operations	2929,822	1,327,140.00	1,602,682.00	Increase in Marketing and Branding expense

The reason for the reclassification of the international long distance expenses from GY\$2,676,832,000.00 to GY\$455,868,208.00 is due to a request from our local auditors to move ATOC internet lease charges to other expenses in the statement. This explains the reclassification of the other expenses from GY\$1,343,208,000.00 in the 2016 financial statement to GY\$3,564,172,000.00.

6. Cost Account Input

There are no hidden numbers from line 181 onwards in the CAM as it relates to the model. As proof of this position, please see Appendix C as a reference in support of our position.

7. Gigabit Passive Optical Network

We do not have this information on hand now but anticipate that this information may be available to Commission when the yearly business development plan is presented.

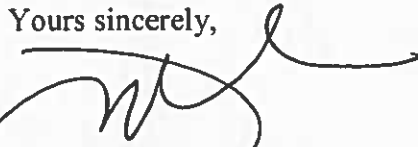
8. Fixed Assets Information

Please see Appendix D as it relates to information of fixed assets that is being requested by the Commission.

9. 2017 Audited Financial Statement:

GT&T provided this information to the Commission on October 8, 2018.

Yours sincerely,



Mr. Mark Reynolds
Director, Legal and Regulatory Affairs
GTT+

Appendix A - WIP Unassigned Breakout as at DEC 2017

Description	GYD
LTE Wimax Replacement PO 26236 Increase BW to Essequibo LTE Server (28150022) - Replacement commencement Failed WiMax deployment- LTE 1800Mhz- Data Offering	761,899,327
Switch to Routing IP Data Network - GDT (26350001) - GTT Core IP network upgrade: switching to routing	655,128,955
SSW Upgrade - ASR Upgrade New ATCA PO 26831 (28150017) - Enhanced Redundancy. Changes required to extend the useful life of the switch	414,134,308
Virtual Pocket Core TOP (Packet Core Expansion) - 28150036 - Mobile Data Core upgrade	336,052,135
DSL Network Upgrade PO 25187 (29600002) - DSL port capacity expansion, avoid network to run out of ports (network equipment) for 3000 new customers	313,353,248
3G Expansion 9 Sites (28100017 - facilities management department) (28150034 - technical team) - 9 NEW GSM SITES FOR GEORGETOWN	182,489,233
MetaSolv Implementation (28150023) - Facilities Server for GPON Facilities initially hosted in Castle Rock	169,491,630
10 LTE SITES - LTE Expansion 10 Sites (28150033) - To add LTE to 10 Existing RBS -	161,961,028
Test Systems Comverse/Amdocs	122,285,682
Coriant Migrate SGT	118,077,212
DC Plant Battery (organized by PO#)	75,389,627
Others - Furniture, fixtures, Electronics, etc.	70,887,084
Inventoy Items	68,033,843
OTT Over the Top Project (28400003)	63,871,386
Sandvine Deployment 2 (26100006) - Sandvine Deployment - IP Policy Management Phase 2	57,667,873
Software Enhancements - Comverse/Amdocs	54,422,550
NOC (28150030) - Upgrade NOC Sonoran Systems	47,796,367
DPWR Other (Power) - Other capitalised expenses that are not a Specific Project or a Major Routine Capital expense	45,970,849
Middleware Software	36,026,687
DNS Other (Data Network Systems)	23,741,993
Bartica Services' Microwave Upgrade 28150021 - Backhaul Upgrade & 3G/4G deployment in Bartica - Microwave	20,735,523
IP address 19 block	18,822,090
GTT Store in Store (Others) 26100002 - (organized by store name)	17,317,809
Reconciling items	17,073,271
Billing System	15,743,207
Bartica upgrade (Manika Site)(28150021 - Backhaul Upgrade & 3G/4G deployment in Bartica - Microwave	12,060,300
Astra Metasolv	9,080,400
Troy Mining Deployment	8,485,562
FMD fire surpression	6,635,726
Remodeling of Warehouse	4,751,585
KwikTag for Dynamic GP (GTT+HRIS) 24300004 - To be used for HR Transformation Plan. This is to reduce the volume of paper work throughout the Company.	3,555,930
Computer Equipment in transit	2,427,115
Generator	2,103,600
Corentyne River Fiber Crossing	1,986,600
55 Brickdam AC	1,401,480
SIM Application 26100010 - To reduce the amount of paper work when dealing with Vendors in the Vendor Sales section.	1,035,300
GTT Store in Store Concepts (Buildings) (organized by store name)	695,000
Netsuite	680,400
Multi Tester	484,218
Telephone house light change LED	403,535
Vendor Management Self Topup machine	360,468
Surveillance Equipment	212,000
Self service portal - To enable 'do it yourself access to GTT services'	200,000
Security of Generator batteries: Two sites	175,000
Sita Room Renovation	80,600
Vehicle Cabinet 28000008- Insert one vehicle cabinet	62,500
Rectifiers DC Plant Batteries	9,525
Grand Total	3,925,259,762

Appendix C - Cost Account Inputs

Cost accounts

Account code	Account description	EOY 2017 (in GYD)	EOY 2017 (in USD)	Classification financial statements
40010.1001	COGS - Equip Exp - Handsets	374,514,638	1,783,403	Customer operations
40010.1010	COGS - Equip Exp - Data Only	-16,457,946	-78,371	Customer operations
40010.1035	COGS -Equip Exp-New Add-LTE Modems	14,546,808	69,271	Customer operations
40010.1100	COGS - Equip Exp - Inventory Write-off	42,617,745	202,942	Other
40010.1850	COGS - Equipment Costs	29,597,220	140,939	Customer operations
40010.1855	COGS - Equip Exp - Cellular Handsets (Warranty Replacement)	20,399,400	97,140	Customer operations
40010.1860	COGS - Equip Exp - SIMS	44,935,399	213,978	Customer operations
40010.1865	COGS - Equip Exp - Cellular Accessories	9,259,072	44,091	Customer operations
40010.1875	COGS - PBX Equipment	52,804,170	251,448	Customer operations
40010.2000	DSL - Equipment Expense	84,529,754	402,523	Customer operations
40010.2100	COGS - Product Materials	-9,190,125	-43,763	Customer operations
40035.3000	ILD Outbound Wireline Expense	238,982,145	1,138,010	International long-distance expenses
40036.2000	COGS - Direct Costs - Wholesale Roaming Voice and Data	25,355,078	120,738	International long-distance expenses
40037.1001	COGS - Direct Costs - Billing - Rating/Billing/Registrations	6,994,907	33,309	Customer operations
40038.1005	COGS - Direct Costs - Spectrum - Cellular Frequency	180,000,000	857,143	Plant specific operations
40038.1015	COGS - Direct Costs - Spectrum - Network Frequency	67,508,796	321,470	Plant specific operations
40200.1450	COGS - Prepaid Cards	64,278,361	306,087	Customer operations
40200.2100	COGS - Blackberry Enterprise Cost	20,908,486	99,564	Local network services
40600.2220	COGS - Direct Costs - Facilities - Pole Rent	38,010,000	181,000	Plant specific operations
40600.2250	COGS - Direct Costs - Facilities - Cell Site Maintenance	73,349,983	349,286	Other
41100.1110	Termination Exp - Land to Digicel	551,299,490	2,625,236	Local network services
41100.1130	Termination Exp - Int'l incoming to Digicel	196,643,735	936,399	Local network services
41100.1150	Termination Exp - Cellink to Digicel	738,860,324	3,518,382	Local network services
41100.1160	Termination Exp - Cellink SMS to Digi SMS	14,361,998	68,390	Local network services
41100.2050	Intercompany COGS - GFiber	58,165,758	276,980	Local network services
41400.1000	TV - Programming	4,040,751	19,242	Customer operations
42000.1200	COGS - IPL Backhaul Charge	15,568,094	74,134	International long-distance expenses
42000.1500	COGS - Internet Lease Charge	2,606,849,540	12,413,569	International long-distance expenses
42900.1010	Intercompany Expense - Video Transmission	22,680,000	108,000	Local network services
42900.1020	Intercompany COGS To Be Eliminated	439,562,620	2,093,155	Local network services
49000.1200	Bad Debt Expense - Wireline	223,959,761	1,066,475	Bad debt expense
51000.1001	ATN Shared Service - Accounting	110,621,179	526,768	Corporate operations
51000.1002	ATN Shared Service - Billing	44,109,975	210,048	Corporate operations
51000.1003	ATN Shared Service - Call Center	35,701,029	170,005	Customer operations
51000.1005	ATN Shared Service - Engineering/NOC	31,135,784	148,266	Plant specific operations
51000.1006	ATN Shared Service - IT Services	168,701,532	803,341	Corporate operations
51000.1007	ATN Shared Service - Revenue Assurance	43,277,277	206,082	Corporate operations
51000.1008	ATN Shared Service - Roaming	55,194,197	262,830	International long-distance expenses
51000.1009	ATN Shared Service - Mediation	27,814,374	132,449	Corporate operations
51000.1012	ATN Shared Service - Vendor Management	20,134,296	95,878	Corporate operations
51000.1014	ATN Shared Service - Project Management	30,423,141	144,872	Corporate operations
51000.1025	ATN Shared Service - Ops Support	16,631,303	79,197	Corporate operations
51000.1100	ATN Shared Service - Premium	783,831,407	3,732,531	International long-distance expenses
52610.1100	Compensation - Salaries	620,475,668	2,954,646	Plant specific operations
52610.1110	Compensation - Bonuses	56,426,400	268,697	Corporate operations
52610.1130	Compensation - Vacation Allowance	-3,473,955	-16,543	Corporate operations
52610.1135	Compensation - Vacation Days	143,416,433	682,935	Plant specific operations
52610.1153	Compensation - Employee Commission - Handsets	4,826,700	22,984	Plant specific operations
52610.1155	Compensation - Employee Commissions - Postpaid Service Sale	30,900	147	Plant specific operations
52610.1158	Compensation - Employee Commission - Prepaid Service Sale	5,941,102	28,291	Plant specific operations
52610.1161	Compensation - Employee Commission - GPON Sales	2,152,800	10,251	Plant specific operations
52610.1164	Compensation - Employee Commission - Modem Sales	1,447,800	6,894	Plant specific operations
52610.1999	Compensation - Other	197,294	939	Corporate operations
52610.2150	Compensation - Salaries Management	985,179,699	4,691,332	Corporate operations
52610.2200	Compensation - Salaries Overtime	160,540,613	764,479	Corporate operations
52610.2300	Compensation - Standby	-22,887	-109	Customer operations
52610.2350	Compensation- Night Differential	2,113,365	10,064	Corporate operations
52630.1000	Benefits - Health Insurance	11,976,811	57,032	Corporate operations
52630.1005	Benefits - Life Insurance	4,720,800	22,480	Other
52630.2020	Benefits - Cell Phones	43,000	205	Corporate operations
52630.2030	Benefits - Employer Pension	-179,897,835	-856,656	Corporate operations
52630.2035	Benefits - Appreciation	3,716,591	17,698	Corporate operations
52630.2100	Benefits- NIS Employer Portion	124,460,615	592,670	Corporate operations
52630.2200	Benefits- Meal Allowance	15,655,598	74,550	Corporate operations
52630.2400	Benefits- Subsistence	86,059,705	409,808	Corporate operations
52630.2500	Benefits - Vehicle Allowance	22,281,573	106,103	Corporate operations
52630.2999	Benefits - Other	-550,831	-2,623	Corporate operations
52640.1200	Professional Fees - Dues/Memberships	18,082,175	86,106	Corporate operations
52640.1310	Professional Fees - Legal- General	13,889,964	66,143	Corporate operations
52640.1311	Professional Fees - Legal- ETC	1,142,344	5,440	Corporate operations
52640.1315	Professional Fees - Legal- PUC	50,000,000	238,095	Corporate operations
52640.1400	Professional Fees - Tax Work and Consultation	943,400	4,492	Corporate operations
52640.1500	Professional Fees - Auditing	12,306,926	58,604	Corporate operations
52640.1510	Professional Fees - Accounting	4,460,456	21,240	Corporate operations
52640.1600	Professional Fees - Recruiting	2,226,808	10,604	Corporate operations
52640.1800	Professional Fees - Contract Labor	172,454,005	821,210	Corporate operations
52640.1850	Professional Fees - Consulting	44,064,721	209,832	Corporate operations
52640.1900	Professional Fees - Licenses and Permits	934,248,135	4,448,801	Corporate operations
52640.2175	Professional Fees - Training and Education	53,696,453	255,697	Corporate operations
52640.2200	Professional Fees - Outside Services	9,122,927	43,443	Plant specific operations

52640.2985	Professional Fees - FST - Shipping & Postage.	866,457	4,126	Corporate operations
52640.2999	Professional Fees - Other	354,378	1,688	Plant specific operations
52640.3000	Advertising - Other	1,000,000	4,762	Corporate operations
52645.1100	3rd Party Commissions - Cell Home Card	1,028	5	Customer operations
52645.1150	Commissions - Agencies - Bill Payments	5,197,820	24,752	Customer operations
52645.1160	3rd Party Commissions - MMG	34,855,907	165,981	Customer operations
52645.1170	Commissions - Sale of GPON Services	14,423,225	68,682	Customer operations
52645.1180	3rd Party Commissions - Other	110,299,020	525,233	Local network services
52645.1190	Commissions - Business to Business - Staff	24,423,128	116,301	Customer operations
52650.1000	Travel and Entertainment - Airfare- Charter	58,000	276	Plant specific operations
52650.1010	Travel and Entertainment - Airfare- Commercial	3,095,328	14,740	Plant specific operations
52650.1020	Travel and Entertainment - Ground Transportation/Parking	1,213,318	5,778	Plant specific operations
52650.1040	Travel and Entertainment - Lodging	5,038,725	23,994	Plant specific operations
52650.1050	Travel and Entertainment - Meals	3,281,129	15,624	Plant specific operations
52650.1060	Travel and Entertainment - Entertainment	6,000	29	Plant specific operations
52650.1070	Travel and Entertainment - Conferences and Meetings	108,262	516	Plant specific operations
52650.1999	Travel and Entertainment - Other	73,987,003	352,319	Corporate operations
52650.2100	Transportation - Vehicle Hire	71,172,305	338,916	Corporate operations
52650.2150	Licenses & Fees - Vehicles	3,662,896	17,442	Plant specific operations
52660.1001	Facilities - Rent Building	65,496,299	311,887	Corporate operations
52660.1010	Facilities - Rent - Retail	8,134,237	38,734	Corporate operations
52660.1012	Facilities - Equipment Rental	175,470	836	Corporate operations
52660.1020	Facilities - Rent - Cellsite	1,860,000	8,857	Corporate operations
52660.1160	Facilities - Janitorial	6,452,846	30,728	Corporate operations
52660.1170	Facilities - Office - Storage	2,100	10	Corporate operations
52660.1200	Facilities - Shop Supplies	369,684,489	1,760,402	Corporate operations
52660.1350	Facilities - Telephone	19,792,519	94,250	Corporate operations
52660.1600	Facilities - Utilities	28,454,886	135,499	Plant specific operations
52660.1610	Facilities - Electricity	880,031,604	4,190,627	Other
52664.1001	Billing & Software Fees	192,556,144	916,934	Plant specific operations
52665.1004	Repairs and Maintenance - Office	20,500	98	Plant specific operations
52665.1005	Repairs and Maintenance - Switch	8,212,635	39,108	Plant specific operations
52665.1100	Repairs and Maintenance - Sites	4,143,032	19,729	Plant specific operations
52665.1101	Repairs and Maintenance - Equipment	722,902	3,442	Plant specific operations
52665.1102	Repairs and Maintenance - Buildings	69,084,919	328,976	Plant specific operations
52665.1103	Repairs and Maintenance - Vehicles	40,329,110	192,043	Plant specific operations
52665.1104	Repairs & Maintenance - Vehicles Petro Diesel	66,731,394	317,769	Plant specific operations
52665.1110	Repairs and Maintenance	379,344,176	1,806,401	Corporate operations
52665.2000	Repairs and Maintenance - ACMA (SGSCS)	1,172,745	5,585	Plant specific operations
52665.1205	Small Tools, Supplies & Equipment	2,523,835	12,013	Plant specific operations
52670.1000	Office - Equipment Repairs/Rental	13,900	66	Corporate operations
52670.1020	Office - Postage and Shipping	83,783,920	398,971	Corporate operations
52670.1025	Office - Customs & Duties	4,000	19	Customer operations
52670.1040	Office - Supplies	54,041,435	257,340	Corporate operations
52670.1045	Office - Software	2,942,327	14,011	Corporate operations
52670.1047	Office - Testing Equipment	3,000	14	Corporate operations
52670.1048	Office - Staff Functions	999,050	4,757	Corporate operations
52670.1049	Office - Petty Cash Over/Under	-1,303,216	-6,206	Customer operations
52670.1999	Office - Other	555,916	2,647	Corporate operations
52670.2000	Uniforms & Protective Clothing	8,850,972	42,147	Corporate operations
52670.3000	Books and publications	112,230	534	Corporate operations
52675.1001	Advertising & Promotions - Branding	134,130,822	638,718	Customer operations
52675.1010	Advertising & Promotions - New Sub Adds	285,620	1,360	Corporate operations
52675.1020	Advertising & Promotions - Marketing Supplies	992,870	4,728	Customer operations
52675.1030	Advertising & Promotions - Website Expenses	1,882,060	8,962	Customer operations
52675.1040	Advertising & Promotions - Sponsorship	18,217,965	86,752	Customer operations
52675.1045	Advertising & Promotions - Sponsorship - CPL	46,412,127	221,010	Customer operations
52675.1048	Advertising & Promotions - Media - CPL	1,724,838	8,214	Customer operations
52675.1050	Advertising & Promotions - Newspaper	70,056,512	333,602	Customer operations
52675.1060	Advertising & Promotions - Magazine	371,219	1,768	Customer operations
52675.1070	Advertising & Promotions - Radio	27,158,515	129,326	Customer operations
52675.1080	Advertising & Promotions - Web	17,644,821	84,023	Customer operations
52675.1100	Advertising & Promotions - Television	10,216,040	48,648	Customer operations
52675.1110	Advertising & Promotions - Agency	36,418,609	173,422	Customer operations
52675.1120	Advertising & Promotions - Research	-2,504,898	-11,928	Customer operations
52675.1130	Advertising & Promotions - Promotions	95,761,161	456,006	Customer operations
52675.1140	Advertising & Promotions - Printing & Reproduction	6,803,300	32,397	Customer operations
52675.1170	Advertising & Promotions - Collateral	26,296	125	Customer operations
52675.1180	Advertising & Promotions - Signage	17,667,007	84,129	Customer operations
52675.1190	Advertising & Promotions - Events	6,977,640	33,227	Customer operations
52675.1200	Advertising & Promotions - Out Of Home	513,000	2,443	Customer operations
52675.1215	Advertising & Promotions - Other	35,241,543	167,817	Corporate operations
52675.6000	Marketing and Sales Expenses	41,287,235	196,606	Customer operations
52675.6210	Legal Charges	1,850,000	8,810	Customer operations
52680.1000	Business Insurance - Property	95,123,996	452,971	Corporate operations
52680.1005	Business Insurance - Auto	7,175,291	34,168	Plant specific operations
52680.1015	Business Insurance - General Liability	3,521,539	16,769	Corporate operations
52680.1045	Business Insurance - Umbrella	1,058,645	5,041	Corporate operations
52680.1057	Business Insurance - Errors and Omissions	1,189,843	5,666	Corporate operations
52680.1065	Business Insurance - Cargo	415,030	1,976	Corporate operations
52680.1999	Business Insurance - Other	3,000	14	Corporate operations
52690.1100	Business Taxes - Property	270,060,402	1,286,002	Other taxes
52690.1600	Business Taxes - Local Govt Rates & Taxes	55,501,324	264,292	Other taxes
52690.1999	Business Taxes - Other	26,500	126	Other taxes
52695.1010	Administrative - Bank Fees	35,637,209	169,701	Corporate operations
52695.1999	Administrative - Other	2,481,190	11,815	Corporate operations
52830.1100	Allocation to Work In Progress	-298,290,601	-1,420,431	Plant specific operations

