

GUYANA CONSUMERS ASSOCIATION

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1st October, 2018

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

Dear Madam,

Re: Rate for Subscriber Activated Call Blocking Feature

I refer to the submission of the Guyana Telephone and Telegraph Company (GTT) on the above-mentioned subject.

There are five objections/considerations we are hereby raising on GTT's submission:-

- (I) GTT's new rates are subscription-based and not use-based. This implies that the consumer/customer must pay GTT a rate for which he may not be enjoying the service at all. For example, the telephone service could be disrupted for numerous reasons - GTT's failure to effectuate repairs; force majeure; an accident to the transmission pole and so on. **To avoid the consumer being exploited, charges whatever they may be, must be use-based.**
- (II) GTT has not indicated that they have made any new investment for this feature nor have they given any indication how they arrived at a rate of \$310 per month. Indeed, if they had a notional figure of 10,000 subscribers, they would be harvesting \$37 million per annum from the consumers without any investment.
- (III) On the other hand, if GTT claims that they had made any investment, they should itemize such alleged investment with the year in which it was made. Thereafter, the rate should be arrived at by calculating on a pro-rata basis.

GTT should have done such a fundamental requirement with its submission to the PUC and in asking the public to pay new rates of this kind.

- (IV) The GCA feels that if such a service must be provided, it should be done without charge to the GTT customer.
- (V) There are two clarifications GTT should make to their submission: The first is how an emergency call is exempted and being able to avoid the PIN and the second is to give an explanation of 900 calls since such an explanation had never been given to the Guyanese public.

Yours sincerely

Patrick P. Dial, CCH; AA; JP

Copied: Secretary, PUC