

## Options for Reform

### Preferred Option (A)

It is proposed that the following approaches to price regulation be adopted. These are consistent with best practices in a growing number of countries.

- **Rate rebalancing** – Should be implemented as soon as possible, to raise the level of local rates to real economic costs. This reform will provide a financial incentive to GT&T, and to other service providers that may be licensed in the future, to expand services to all consumers and businesses that will pay the costs of such expansion.

It is proposed that a Rate-Rebalancing Plan be developed as part of the National Telecommunications Policy. The purpose of this plan would align local rates more closely to costs, taking into account benchmark rates for similar countries.

The work in developing the Rate Rebalancing Plan may be conducted in co-operation with other regional regulatory authorities, such as ECTA. This would permit the development or estimation of reasonable 'benchmark' rates for the economic costs of an efficient operator providing services to the region. Such rates may provide a reasonable proxy for local rates in Guyana, and a good starting point for rebalancing.

- **Introduce Incentive Regulation** – GT&T's current rate-base / rate of return form of regulation should be replaced with a form of incentive regulation. This step should be taken in conjunction with rate rebalancing and the introduction of competition.

As indicated earlier in this section of the Paper, rate base / rate of return regulation of GT&T has been problematic. It is a difficult task for regulators, in the best of circumstances to design a rate-base/rate of return method that sends proper market incentives to regulated companies. Most countries have abandoned this form of regulation, and it is proposed that the new Guyana National Telecommunications Policy should do the same.

Under incentive regulation, GT&T's initial rates should be set at a level that is reasonably cost based, taking into account benchmark rates in comparable countries. Once these rates are set, GT&T should be permitted to adjust its prices annually in accordance with a 'price cap formula'.

The price cap formula will allow GT&T to increase rates to keep pace with inflation. The price cap formula will typically also include an X factor, to reduce costs annually in line with expected industry productivity improvements. If GT&T is successful in increasing its revenues, or reducing its costs, it should keep the resulting profits. If GT&T not successful in doing so, consumers will be protected, because prices may not increase above the 'price cap'. GT&T would have a strong incentive to operate efficiently and to grow its business revenues. It would not have any incentive to increase its costs, since increased costs could not generally be recovered through rate increases.

- **Deregulation of Competitive Rates** - Price regulation will only apply in markets where there is a dominant operator. Only the prices of the dominant operator in a market will be regulated. Prices of new entrants and other non-dominant operators will not be regulated. As soon as sufficient competition develops in a market that an operator becomes non-dominant, its prices will be deregulated.
- **Other Consumer Protection** – Rules to ensure consumer protection will generally apply to dominant operators. Some basic provisions to ensure consumer protection will also apply to other operators that obtain an individual licence (see discussion under Licensing Policy).

### **Implications**

The implications of this option are generally addressed under the heading Improving Sector Performance.

## 6. Universal Access

### Proposed Objectives

It is proposed that the National Telecommunications Policy should include initiatives to increase the level of access to telecommunications services to all citizens of Guyana. This means that those citizens who live in remote areas or do not have the economic means to subscribe to individual telecommunications services should have a reasonable means of access to shared public telecommunications facilities.

In Guyana, and countries with a similar level of economic development, it is not reasonable to expect that penetration of individual access lines will ever approach the high levels of OECD countries. Accordingly, it should be a major policy thrust of the Government to bring access to 'shared' telecommunications services to a large proportion of the unserved population. Shared access facilities should include not only public pay telephones, but shared access to the Internet and other advanced telecommunications services. Such access can be provided, for example through public 'telecentres' located in schools or other public places.

The challenge of financing expansion of such shared access services, which will often be uneconomic, is addressed under the title, Options for Reform, below.

### Current Situation

As indicated in Annex 1, Guyana currently has high levels of teledensity for individual line services, relative to its level of economic development. However, Guyana's level of 'public teledensity' is not high.

As a result, it appears that a small number of people in the middle and upper income levels of Guyana enjoy access to telecommunications services, including telephony and the Internet. However, there appear to be large communities and groups of Guyanese citizens in the country's interior, as well as on the coastal plain, who have no real access to modern telecommunications. In the parlance of telecommunications and development, these citizens are often described as being on the wrong side of the 'digital divide'. It should be the policy of the Government to bridge this divide.

## Options for Reform

The Options for extending Universal Access are essentially those discussed earlier in this paper under the heading Improving Sector Performance. These options are:

**Option A** - Imposition of Mandatory Network Expansion Obligations on GT&T

**Option B** - Establishment of Access Deficit Charges

**Option C** - Government or international development funding of network expansion by GT&T

**Option D (Preferred Option)** - Market-based Reforms, including

- Rate rebalancing
- Open all markets to competition in an orderly fashion
- Introduce Incentive Regulation
- Establish a Universal Access Program

The main aspects of the Universal Access Program, which is a key element of this option are described below:

**Universal Access Program** – The purpose of this program is to expand the provision of telephone and Internet access to non-economic areas and low income subscribers.

Based on the very successful experience of Peru, Chile and other countries, it is proposed that this Universal Access Program would be funded through a Universal Access Fund (UAF). Revenues to the UAF would be contributed by all licensed telecommunications service providers, in proportion to their gross revenues from licensed services, net of intercarrier payments (e.g. for interconnection charges).

Additional revenues would be sought for the UAF from other sources, particularly international financial institutions and donors. There has been increasing interest in funding this type of UAF on the part of The World Bank and other international and bilateral agencies. Such funds are seen as an effective means to provide efficient and effective subsidies to increase access to the 'Global Information Infrastructure', to foster economic development and to reduce poverty.

As previously indicated, payments out of the UAF would be based on a competitive bidding process. Service providers, including GT&T could bid to receive a UAF subsidy to extend networks and provide access services, such as community telecentres and public payphones, to unserved areas, such as those in the interior. A variety of technologies could be used to build such networks, including VSATs and Wireless Local Loop services. The bidder with the lowest subsidy requirement would receive the subsidy, conditional upon meeting its service expansion commitments.

### Implications

Details and implications of these options are discussed in the section on Improving Sector Performance. For the reasons set out there, none of options A, B or C are likely to be effective in promoting universal access in Guyana today. However, a number of the measures included under the preferred option D will promote universal access.

From the perspective of universal access, the most negative measure included in this option is rate rebalancing. However, as indicated in Annex 1, Guyana currently has relatively high teledensity levels given its level of economic development. When this factor is combined with the relatively large waiting list, it is unlikely that rate rebalancing would drive basic teledensity levels below levels for comparable countries. In fact, rate rebalancing and competition should increase teledensity for individual line services.

As Annex 1 also illustrates, however, Guyana's level of 'public teledensity' is not high. It is understood that a significant percentage of the public pay phone usage in the country is for international calls that are billed collect or billed to calling cards.

Accordingly, if the Government's policy is to extend telephone and Internet access to unserved citizens, there must be a significant new initiative to establish a Universal Access Program, such as the one described in the preferred option.

## 7. Interconnection

### Proposed Objectives

The objective of interconnection policy should be to provide a clear, transparent and fair basis on which existing and new operators and service providers interconnect their networks.

An effective interconnection policy should promote the development of a 'network of networks' within Guyana and internationally, allowing communication between subscribers of all networks on a seamless basis. Such an interconnection policy should permit new entrants to access customers on the networks of incumbent operators, and vice-versa, on reasonable cost-based terms.

The policy should benefit both the incumbent operator and new entrants by providing wider connectivity for their customers, stimulating overall national telecommunications demand, and creating new sources of revenues for all players in the market.

### Current Situation

There is not a clear or detailed regulatory approach to interconnection today. This is not surprising, given the early stage of the process to introduce competitive telecom services in Guyana.

The lack of clear interconnection rules has been cited as a reason for the lack of competition in the cellular market. While an interconnection order was issued by the PUC earlier this year, it has been subject to litigation, and there is some uncertainty about its current status. The existing PUC decision on interconnection (Decisions 4 of 1997) does not cover many of the issues normally found in the regulatory framework for interconnection.

The establishment of clear rules for interconnection is a pre-requisite for the development of effective competition, not only in the cellular market, but also in most other telecommunications markets in Guyana.

### Options for Reform

#### Preferred Option (A)

As a preferred option, it is proposed that a clear set of guidelines for interconnection be drafted in the form of a regulation. These guidelines should be prepared in consultation with the industry and

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other interested parties. The guidelines would provide a framework for negotiations of specific interconnection agreements between operators.

It is proposed that the interconnection regulations be based on the following principles. After consultation, based on this Paper, the interconnection principles should be finalized in the National Telecommunications Policy.

The following interconnection principles are proposed:

1. **Interconnection of all Networks Encouraged** - All operators should be encouraged to interconnect with each other, so as to provide seamless end-to-end interconnectivity between all ICT services in Guyana and internationally.
2. **Mandatory Interconnection with Dominant Operators** - Dominant operators should be required to interconnect with all other licensed operators and service providers registered under general authorizations.
3. **Non-Discrimination** - Dominant operators should not discriminate unduly in terms of interconnection between operators, or between the dominant firm's own operations (e.g. cellular operations) and those of interconnecting competitors.
4. **Points of Interconnection** - Dominant operators should establish standard points of interconnection with their networks (often a major tandem exchange). Interconnection should be permitted at any other technically feasible point, but the requesting operator should pay any additional costs of non-standard interconnection.
5. **Payment of Interconnection Costs** - Interconnection costs should generally be borne by the service provider whose activity causes the costs to be incurred.
6. **Cost-based Interconnection Charges** - Over the longer run, interconnection charges should be cost based. However, as an interim measure, rates may be set by the regulator based on benchmark rates in other countries.
7. **Unbundling** - Charges for interconnection should be unbundled, so that interconnecting operators only pay for the services or facilities they require. Essential facilities, including local loops, shall be provided on an unbundled basis.
8. **Reference Interconnection Offer** - GT&T, as the major network operator in Guyana, should prepare a Reference Interconnection Offer (RIO) in accordance with the practice in many countries. The RIO should set out standard terms and conditions for interconnection with GT&T's network, based on the rules set out in the interconnection regime.
9. **Approval and Publication of Interconnection Agreements** - All interconnection agreements entered into with dominant operators would be subject to approval by the regulator, to ensure conformity with the regulations. Such agreements would be publicly available, subject to orders by the regulator to exempt from disclosure schedules or other information the release of which would result in competitive or other demonstrable harm to the parties.

10. **Interim Interconnection Agreements** - Pending completion of the interconnection regulation and publication of the RIO, GT&T should be encouraged to interconnect with cellular and other licensed operators, on terms that are mutually negotiated. However, the terms should be subject to review and amendment to conform with the interconnection regulations, once they are implemented.
11. **Dispute Resolution** – Interconnection disputes between operators should be resolved by the regulator, in a timely, independent and fair manner. The regulator, or the parties, may refer technical and financial aspects of interconnection to outside experts for mediation and/or arbitration.

**Key Implications:**

The preferred option is generally consistent with good interconnection practices throughout the world. It also complies with the interconnection principles established in the regulation reference paper adopted as part of the 1997 WTO Agreement on Basic Telecommunications (*The Fourth Protocol to the GATS Agreement*).

This option will take somewhat longer to implement than Option B, namely leaving interconnection agreements to be negotiated among operators. However, experience around the world has demonstrated that regulatory guidance is required to ensure that efficient interconnection agreements are reached on a timely basis.

## Option B

Under this option, operators and service providers would be encouraged to freely negotiate their own interconnection agreements. Little or no explicit guidance would be provided to operators on the terms and conditions of interconnection agreements.

Under this option, operators that failed to reach a mutually acceptable interconnection agreement within a reasonable time could return to the regulator, or an independent mediator/arbitrator for assistance in resolving any outstanding disputes.

Under this option, the power of the regulator to approve interconnection agreements would normally be retained, as would the duty to disclose such agreements.

**Key Implications:**

The major advantage of this option is that it can be implemented immediately. However, experience in various countries has shown that this advantage is illusory. It often takes just as long, or longer for parties to negotiate an interconnection agreement. Moreover, given the inequality in their bargaining power, the dominant operator normally has no incentive to enter into an interconnection agreement that will allow competitors to compete effectively.

In some cases, new entrants have had to agree to manifestly one-sided interconnection agreements, as the only basis on which they could enter the market. This has deprived the market of the benefits of effective competition.

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Finally, this option can be unfair to dominant operators, who may agree to a series of trade-offs with interconnecting operators, only to have a finely negotiated balance overturned by the regulator on review.

This option was frequently used by regulators in the early days of telecommunications competition, before the development of much real regulatory 'know-how' on interconnection. However, the option is considered a less desirable one by most telecommunications experts and policy makers around the world today.

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Annex 1  
Teledensity in Guyana

**Summary**

- This Annex provides a world-wide and regional comparison of Guyana's teledensity<sup>6</sup> levels compared to countries with a similar level of economic development.
- Both a world-wide comparison and a more specific regional comparison suggest that Guyana's basic teledensity level is relatively high.
- The Annex also examines Guyana's 'public teledensity' level. The ITU defines public teledensity as the number of public telephones per 1000 inhabitants. Based on available data, it appears that Guyana's public teledensity level is average for comparable income countries.
- These conclusions relate only to the relative size of the fixed telecommunications network. Other performance indicators, including quality of service, waiting lists, price of service, and network provision in rural and other traditionally-underserved areas are not covered in this analysis.

**Basis of Comparison**

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<sup>6</sup> The ITU defines teledensity as the number of main lines divided by 100 inhabitants.

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- The most important determinant of teledensity is economic development. There is a strong relationship between national teledensity and the nation's per capita income. Figure 1 below illustrates the relationship between teledensity and per capita income<sup>7</sup> for all countries in the world.
- The strong relationship between teledensity and per capita income provides an explanation for the major differences in teledensity in different countries. This relationship has been recognized by researchers and analysts, including at the ITU and the World Bank. The relationship holds true at all levels of per capita income.

### Guyana and income-comparable countries around the world

- According to the World Bank, Guyana's per capita gross national income ("GNI") for 1999 was U.S. \$760. In order to study Guyana's teledensity performance on a global basis, we have determined that the principal comparison parameter be GNI per capita and that the appropriate comparison range would be countries around the world with GNI per capita of between \$400 and \$1,600 in 1999. The lower range is approximately half of Guyana's GNI per capita, while the upper range is approximately double that of Guyana's GNI per capita. According to the World Bank, there are about 52 countries, including Guyana, within this range.
- From this gross sample of countries we exclude 13 countries of the former Soviet Union or Eastern Block<sup>8</sup>. These countries generally have significantly higher teledensities than the rest of the sample due to their historical heavy investment and continuing subsidisation of infrastructure, including telecommunications. It is also a holdover from the previously higher economic classification of these countries. After excluding these 13 countries, we refer to the remaining 39 countries as the World income-comparable group.
- As shown in Figure 2, Guyana's teledensity performance relative to the World income-comparable group is very good. In fact, based on a simple regression analysis, Guyana's teledensity appears to be about double what may be expected given its GNI per capita.
- Within the World income-comparable group of 39 countries, only six have a higher teledensity than Guyana. Three of these countries, Maldives, Cape Verde and Tonga, are small island states that have less than half-a-million people and high population densities. The other three countries are China, Syria and Ecuador.
- With respect to public teledensity<sup>9</sup>, Figure 3 plots public teledensity and GNI per capita for the World income-comparable group of countries. The relationship between public teledensity and GNI per capita appears to be less strong than that of teledensity and GNI per capita. Nevertheless, based on a simple regression analysis, Guyana's relative performance is average.

### Guyana and income-comparable countries in the Americas

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<sup>7</sup> The World Bank uses Gross National Income (GNI) per capita as its preferred indicator for the classification of economies. For the most recently available data year, 1999, the classification of economies was in current US dollars: low income, less than \$755; lower-middle-income, between \$756 and \$2,995; upper-middle-income, between \$2,996 and \$9,265; high income, more than \$9,266.

<sup>8</sup> These countries include Moldova, Azerbaijan, Armenia, Georgia, Turkmenistan, Uzbekistan, Ukraine, Albania, Yugoslavia, Bosnia & Herzegovina, Kazakhstan, Bulgaria, and Romania.

<sup>9</sup> The ITU defines public teledensity as the number of public telephones per 1000 inhabitants.

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- Including Guyana, there are eight countries of the Americas in the World income-comparable group. In order to study Guyana's teledensity performance on a regional basis we examine these eight countries, which we refer to as the Americas income-comparable group, in Table 1<sup>10</sup> below.

Table 1: Guyana and the Americas income-comparable group of countries

Country	GNI / Capita (US\$)	Population (m)	Urban Population (%)	Main Lines (k)	Teledensity (main line / 100 pop.)	Public Telephones (k)	Public Teledensity (public phones / 1000 pop)
Nicaragua	410	4.9	56	150	3.04	2.36	0.48
Haiti	460	8.1	35	70	0.87	0.02	0.00
Guyana	760	0.9	38	64	7.49	0.43	0.50
Honduras	760	6.3	52	279	4.42	3.11	0.49
Bolivia	990	8.1	62	503	6.17	11.42	1.40
Cuba	1,329	11.2	75	434	3.89	11.85	1.06
Ecuador	1,360	12.4	64	1,130	9.10	3.31	0.27
Paraguay	1,560	5.4	55	297	5.54	1.93	0.36

- Note that in the Americas income-comparable group we have not included a number of countries of the Americas. The principal reason for this exclusion is that they have a GNI per capita significantly higher than that of Guyana. For instance, we have excluded lower-middle-income countries of the Americas with GNI per capita above \$1,600, including Belize, Colombia, Dominican Republic, El Salvador, Jamaica, Peru, St. Vincent and Suriname. We have also excluded upper-middle-income<sup>11</sup>, and high income<sup>12</sup> countries of the Americas.
- In terms of teledensity, Guyana compares very well to the Americas income-comparable group of countries. Only Ecuador, with a GNI per capita 75% higher than that of Guyana, has a higher teledensity than the 7.49 of Guyana. Guyana has the same GNI per capita as Honduras, yet it has a teledensity that is 70% higher.
- Guyana' good teledensity performance is in spite of two factors that would otherwise be expected to make it more expensive to install and maintain Guyana's network. One

<sup>10</sup> All data are for 1999. Telecommunications-specific data is from the ITU, the remaining data is from the World Bank.

<sup>11</sup> Antigua and Barbuda, Argentina, Brazil, Chile, Dominica, Grenada, Guadeloupe, Mexico, Panama, Puerto Rico, St. Kitts and Nevis, St. Lucia, Trinidad & Tobago, Uruguay and Venezuela.

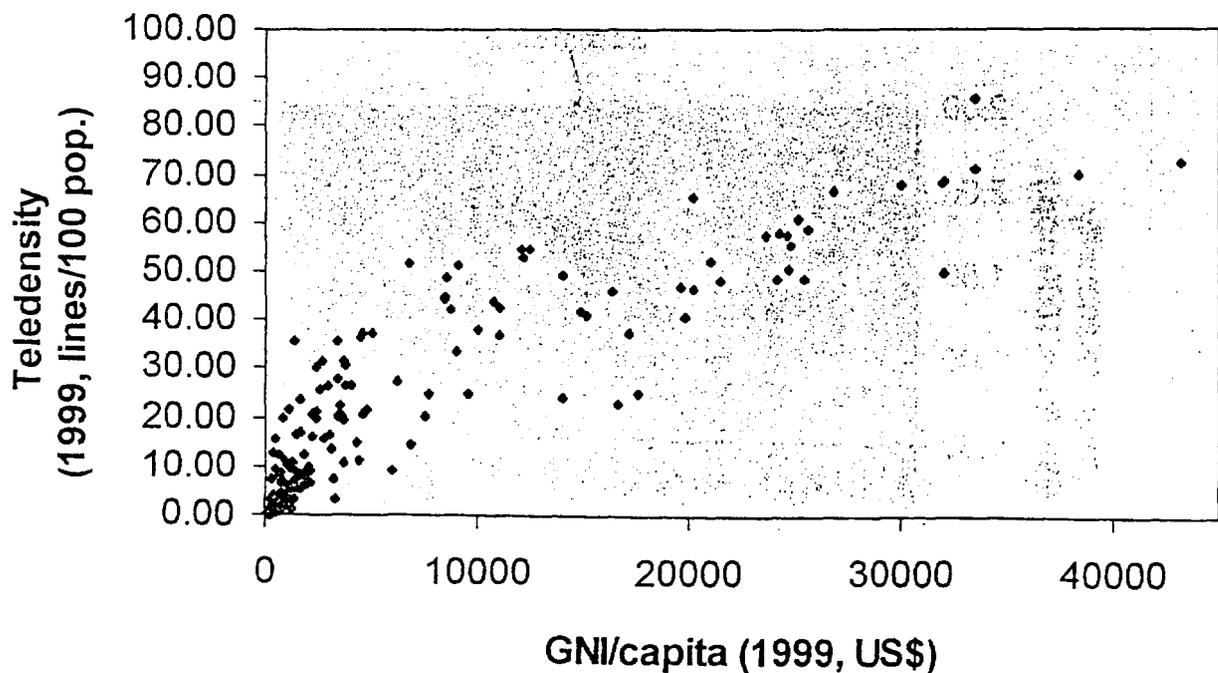
<sup>12</sup> These countries include Aruba, Bahamas, Bermuda, Canada, French Guyana, Martinique, Netherlands Antilles, United States and Virgin Islands (U.S.).

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factor is overall population size; the other is percentage of urban population. All of the Americas income-comparable group countries have a bigger population than Guyana. Most also have a higher percentage of urban population than Guyana.

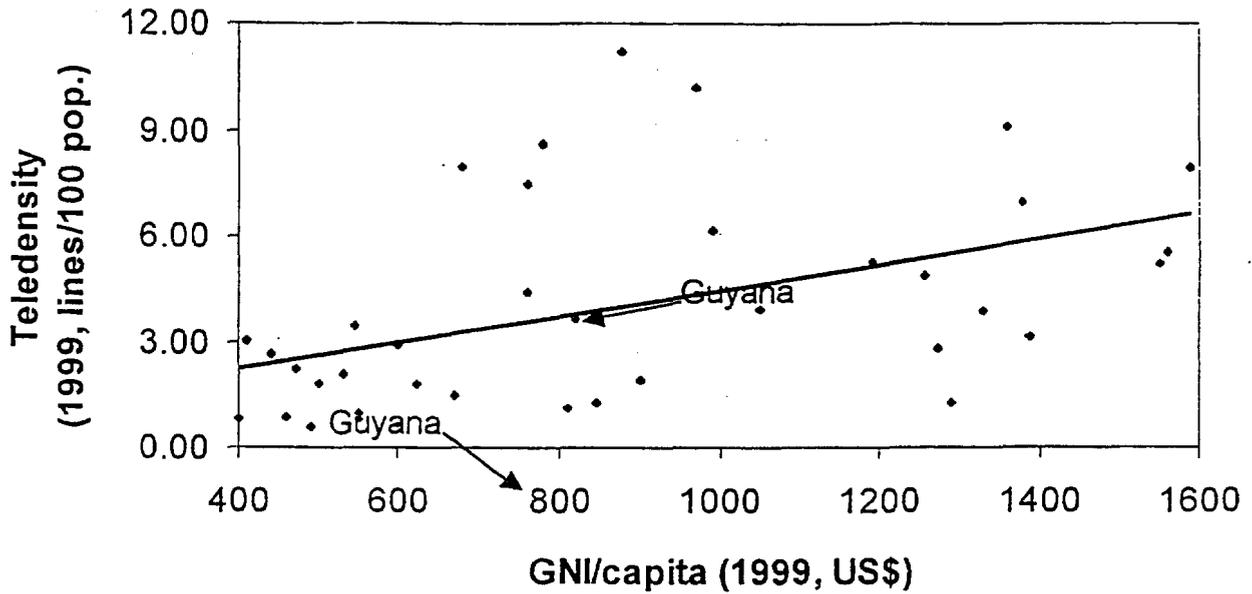
- Overall population size may be a determinant of teledensity, given that telecommunications networks are generally thought to be subject to economies of scale. These economies mean that, on a per line basis, it will be relatively cheaper to install larger networks than smaller networks. Hence, holding everything else equal, countries with larger populations will have relatively higher teledensity than those with smaller populations.
- The percentage of a country's population that lives in urban areas may also be determinant of teledensity. Local telecommunications networks are subject to economies of density. That is, the higher the subscriber density, the lower the per line cost. Hence, holding everything else equal, countries with relatively larger urban populations will have relatively higher teledensity than those with smaller urban populations.
- In terms of public teledensity, Guyana is average compared to the Americas income-comparable group of countries. Guyana's public teledensity of 0.50 is around the average of the group. Guyana scores higher than 5 countries, but significantly lower than the two leaders, Cuba and Bolivia.

Figure 1: Teledensity vs. GNI/capita  
(All Countries)



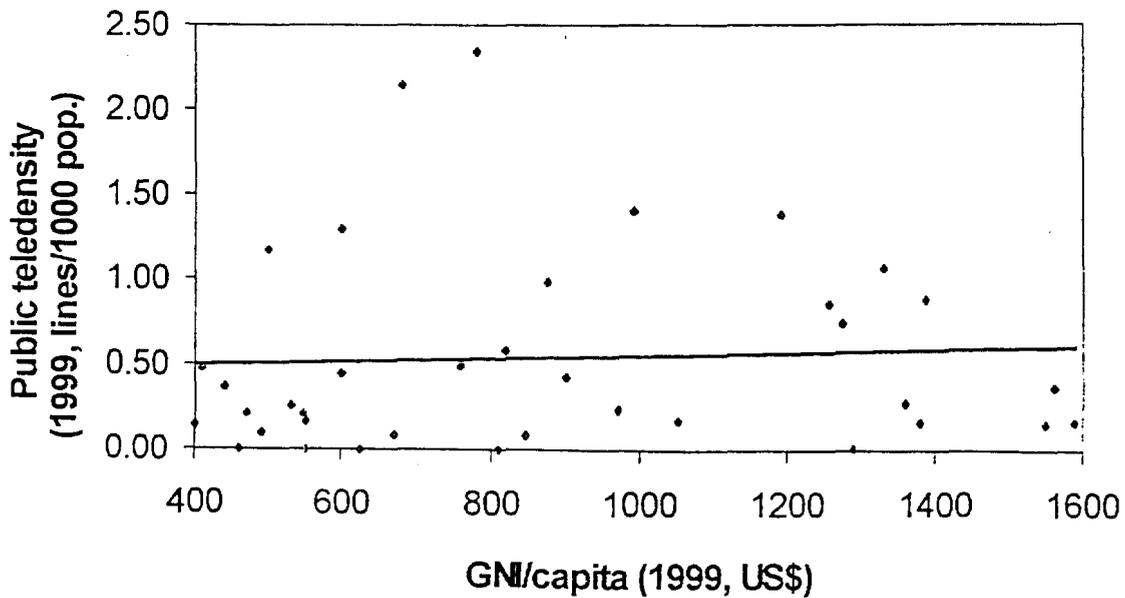
**Figure 2: Teledensity vs. GNI/capita**

(Countries with GNI/capita of US\$400-1600, excluding ex-Soviet Union and Eastern Block)



**Figure 3: Public Teledensity vs. GNI/capita**

(Countries with GNI/capita of US\$400-1600, excluding ex-Soviet Union and Eastern Block)



## Annex 2

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Project Execution Unit for Modernization of the  
Telecommunications Sector

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# Consultation Paper on Issues and Options for Reform of the Telecommunications Sector

## Annex 2

### A Comparison of Local Telephone Rates in Guyana and the Americas Region

#### Introduction

- It is difficult to make accurate comparisons between local telecommunications rates in different countries. Pricing structures and boundaries of local areas vary significantly from country to country. However, it is useful to make some comparisons, in order to provide a sense of local rate levels in Guyana. Please note that the data set out in this Annex is subject to the comments in the text.

#### Comparison of customers with similar local usage

- Table 1 sets out information from a survey of Americas region telephone rates conducted periodically by the US-based Alexis de Tocqueville Institution. A description of the survey methodology and of the Alexis de Tocqueville Institution can be found on that organization's web sites, at [www.infoamericas.org](http://www.infoamericas.org) and [www.adti.net](http://www.adti.net).
  - The survey results are extracted here for illustrative purposes. The survey uses a 'basket' of services approach to compare the prices of different telecommunications services in different countries of the Americas region. Only the local services comparison is included in this Annex. Other comparisons can be found on the organization's web site.
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- Unfortunately, Guyana has not been included in recent versions of the organization's survey. However the results of its 1998 survey give a general picture of the comparative level of Guyana's local rates.
- The following table sets out the comparative monthly bills for a telephone customer with 240 minutes of local calls, in 20 countries of the Americas region.

Table 1		
Monthly Customer Bill for 240 minutes of Local Calls (in US dollars)		
Country	Cost (\$US)	Rank
Argentina	40.52	20
Bolivia	22.85	18
Brazil	12.43	13
Chile	32.14	19
Costa Rica	4.30	6
Dominican Republic	5.67	7
Ecuador	3.41	2
El Salvador	10.28	11
Guyana	1.88	1
Haiti	4.13	4
Jamaica	3.76	3
Mexico	18.52	16
Nicaragua	7.40	8
Panama	7.40	8
Paraguay	3.84	4
Peru	19.37	17
Trinidad and Tobago	14.57	14
United States	18.42	15
Uruguay	10.95	12
Venezuela	8.81	10

Source: Alexis de Tocqueville Institution, [www.infoamericas.org](http://www.infoamericas.org)

- As noted in the introduction, survey data such as that set out in Table 1 does not provide a comprehensive or truly accurate comparison of local rates. There are many reasons for this. The size of local exchange areas varies considerably from country to country. Thus calls similar to those considered to be 'local' calls in some countries would be considered 'long distance' calls in other areas. Pricing structures also vary from country to country, for example between fixed and usage-sensitive rates, making comparisons difficult.

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**Comparison of monthly subscription rates**

- In addition to usage-based rates, telephone operators in most countries charge a fixed, monthly subscription rate. Table 2 sets out monthly subscription rates in US dollars for Guyana and several other Caribbean countries.

<u>Table 2</u> Monthly Subscription Rates (in US dollars)		
Country	Residential	Business
Antigua	30.00	60.00
Barbados	16.10	47.00
Belize	4.00	10.00
Cuba	6.25	9.95
Curacao	7.78	7.78
Guyana	1.40	6.00
Jamaica	4.98	11.68
St Lucia	8.98	10.09
Trinidad and Tobago	4.64	22.78

Source: GT&T, 2000

- Again, it should be noted that survey data such as these do not give a comprehensive or truly accurate picture of a local customer's costs. Pricing structures and operator pricing strategies vary from country to country. What one operator recovers through monthly subscription rates, another may recover through local usage, long distance or international rates.

## CERTIFICATE OF SERVICE

I, Theresa A. Baum, hereby certify that on this 28<sup>th</sup> day of September, 2001, I served copies of the foregoing Reply Comments of Atlantic Tele-Network, Inc., via hand-delivery or regular mail(\*) upon the following:

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A handwritten signature in cursive script that reads "Theresa A. Baum". The signature is written in black ink and extends across the width of the page.

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