



# Digicel

## Digicel Comments on Comments

### **Draft Mobile Electronic Communications (Roaming Services) Bill and Draft Mobile Electronic Communications (Roaming Services) Regulations**

16<sup>th</sup> January 2016



We thank you for inviting Digicel to provide its Comments on Comments

The comments as provided herein are not exhaustive and Digicel's decision not to respond to any particular issue(s) raised in the Comments of other participants in the Consultation or any particular issue(s) raised by any party relating to the subject matter generally does not necessarily represent agreement, in whole or in part nor does any position taken by Digicel in this document represent a waiver or concession of any sort of Digicel's rights in any way. Digicel expressly reserves all its rights in this matter generally.

Please do not hesitate to refer any questions or remarks that may arise as a result of these comments by Digicel to: -

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## **Comments on Comments**

### **Submission of Anselm Gittens**

Mr. Gittens' submission addresses two areas.

The first of these relates to inadvertent roaming in a specific location within St Lucia. Unfortunately due to the topography of the ECTEL contracting states it is neither technically or economically practical to provide 100% geographic mobile coverage. Due to the proximity of adjacent island states, coastal areas with coverage gaps may be subject to signal over reach from these adjacent islands given rise to inadvertent roaming. Digicel believes that the current proposed wording of the draft legislation recognises the impossibility of eliminating inadvertent roaming but balances this with requirements that operators take reasonable steps to minimise its occurrence.

Digicel is happy to engage with the NTRCs in the contracting States to explore whether the Universal Service fund could be utilised to provide coverage in currently underserved areas.

The second area that Mr. Gittens' submission addresses is the issue of a Central Equipment Identity Register. Digicel notes that this is not a roaming related issue and would more appropriately be addressed elsewhere. Given the relatively small size of the individual jurisdictions in the Caribbean and the ease with which stolen handsets can be relocated to countries outside of the ECTEL contracting States an approach which is limited to ECTEL is unlikely to yield the benefits anticipated by Mr Gittens. Digicel suggests that this issue might more effectively be addressed via the recently constituted Caribbean ICT Collaboration Committee under the auspices of Caricom.

### **Submission of Flow**

Digicel strongly endorses the views put forward by Flow regarding the process and the timelines.

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