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**Joint Response of the CBL Group to the Public  
Consultation on URCA's Draft Annual Plan 2023.**

Submitted to

The Utilities Regulation & Competition Authority

**17 February 2023**

## **1. INTRODUCTION**

The Cable Bahamas Ltd. Group of Companies (The Group/we) incorporating Cable Bahamas Ltd. (Rev) and Be Aliv Limited (Aliv) are appreciative of the opportunity to review URCA's Draft Plan for 2023 and to constructively contribute to the annual planning process of the proposed work projects. The Group recognizes the invitation for contributions to the Draft Annual Plan as an important progressive element in the evolution of the sector and hence takes this invitation as a most important obligation and with the utmost seriousness in anticipation of URCA onboarding proposals and constructive criticism into its final published Plan. The Group's response will focus mostly on the ECS related matters however comments regarding the ES will be made where appropriate.

The work of the ECS increases in its importance to the nation with every year that passes and its strong attachment to the ICTs (Information, Communication, Technologies) which were designated as the third pillar of our country's economy is directly linked to the socio economic improvements of the country and of its sustainability goals agreed with the United Nations in 2015 with implications for the Commonwealth keeping pace with international standards rather than falling backwards with dire consequences as a leading Financial Services and Tourism destination. Indeed, the Group strongly advocates for bringing our third pillar ICTs into the forefront and highlighting its importance with focused campaigns and education and mission objectives and action plans in order to ensure continuous forward movement.

### **GENERAL COMMENTS AND OVERVIEW**

Regrettably the Group has observed a decrease in collaboration on matters with URCA in the past year and anticipates a resumption of the practice which is also vital to regulatory practice at a more harmonized and less aggressive level having regard to the International Telecommunications Union's (ITU) Five Generations of ICT Regulation introduced by URCA earlier. A comparative of the region's regulatory stages and practices saw The Bahamas at the forefront at stage 4 of the five generations.

The Group is pleased to note in the Draft Plan that its earlier call for URCA to facilitate educational sessions for relevant Ministry officials associated with responsibilities for the regulated sector as a part of its Corporate and Consumer Education portfolio is intended in URCA's 2023 general projects. Telecommunications is a highly specialized area with its own jargon and knowledge and understanding cannot be assumed on the part of those officials who are on the periphery of the sector. It is important that

decisions made at the higher levels of government are done so on the basis of knowledge about the sector.

Of particular concern to the Group with this Draft Annual Plan 2023 are the URCA Budget increases which we have vigorously addressed in Section 6 herein. URCA is urged to take note of our constructive criticisms and revise the draft Budget so that it demonstrates the fiscal prudence that is required in this post pandemic era.

URCA has identified a leading strategic imperative for 2023 as “... *creating an impact that reflects that URCA is furthering the interests of the public*”. The Group also notes that through this imperative URCA has reflected its Vision Statement: “*A globally respected Regulator championing the interests of people in The Bahamas and of the sector we regulate*” and we urge URCA to keep this Vision Statement top of mind as it executes its duties in order to ensure that the appropriate balance is made when factoring in the interests of all relevant stakeholders.

## **2. STRATEGIC OVERVIEW FOR 2023**

As the country emerged from the two Covid-19 years (2020 & 2021) in 2022, with its global impact, we acknowledge with URCA the “dynamic environment” caused by the pandemic and the “innovative approaches” taken by us all as Licensees to meet the explosive growth in demand for services during that period and the gradual restoration of normalcy of operations across socio-economic sectors together with the increased reliance on ICTs and telecommunications services, especially broadband. As a major Licensee in the sector, the Group is satisfied that it rose to the challenges and provided high quality services to consumers. We acknowledge URCA’s role in stepping back from rigorous regulation and allowing Licensees to respond in innovative ways as we saw fit to meet the exponential demands. Indeed, the digital transition agenda was propelled by the pandemic with the result that the Group recognized that it could no longer be business as usual and as the sector continues to rebound we have been able to capitalize on lessons learnt and introduce new and more efficient ways of doing business.

It is of interest to note that URCA intends to take a more strategic approach to deliver on its mission of “improving lives through effective utility regulation” in furthering the interest of the public, however the Group reminds URCA that such an objective must be balanced with the interests of Licensees so as not to cause harm to the proper functioning of operators or to their financial health. Certainly, building stakeholders’ confidence as a part of URCA’s activities begins with the knowledge that URCA consists

of skilled employees with requisite specialized expertise in regulation who are retained over a period of time and build institutional knowledge in order to keep abreast of the demands of a dynamic industry . The employee turnover at URCA has been a cause of concern for sometime and we trust that URCA carries out exit interviews to better understand the reasons. Perhaps it is time for URCA to take an in-depth examination of the organization as a whole in order to identify the systemic reasons for such high turnover, particularly in certain areas which, by URCA's admission has impacted its ability to start and complete projects particularly in the past two years, causing a carry over of more than 50% of the 2022 projects which will surely impact the competition of the 2023 projects.

### **3. PRIORITIES FOR 2023 – 2024**

With regard to new initiatives by URCA in its new strategic direction and revised approach is the intention to bring a more structured approach to International and Government relations in 2023 with the formation of an International and Government Relations Unit (IGRU) designed to focus on regulatory strategic imperatives. Given the significance of the 2023 Budget increase, in both the combined Budget and the individual ECS Budget, further on in this Response we have found ourselves constrained to demand a "full accounting" as per the URCA Act of this additional Budget expenditure. Additionally, the Group is requesting a report of all meetings attended, number of attendees and outcomes (if any) as a part of the 2022 published Annual Report under its own heading and going forward in order to confirm to Licensees the value of having the Unit which, after all is paid for by the Licensees. It is essential that Licensees are fully informed on the allocations intended within the budget for this new Unit which should be expected to demonstrate fiscal restraint and that it is not merely treated under the general Budget heading of Conference, Training and Travel.

The Group naturally supports the intention to have more strategic interactions with Small Island Developing States (SIDS) as an important learning exchange opportunity, together with the fact that there is strength in numbers. The Group, however, notes the omission of the CANTO telecommunications organization from the list of international telecommunications bodies due to the fact that URCA is not a member of CANTO although URCA does attend CANTO meetings. CANTO has been in existence for almost 40 years with a 34 country membership of service providers, equipment suppliers, government Ministers and ministries, consultants and educational institutions from the Caribbean and the Americas and presents "a forum to explore, champion and advocate for a regional digital ecosystem with safe universal connectivity, inclusion policy frameworks and a datasphere that is resilient and secure ". (CANTO 2023 AGM registration

promotion). It is the first line of problem vetting and regulatory intervention and innovation and is of particular benefit to our region which consists primarily of CARICOM members. We would certainly not want URCA to overlook the relevance of CANTO and its benefits.

The facilitation of ongoing digital transition initiatives is of course, essential and we note that globally a standard has also been introduced and speaks to the quality of the digital experience in the transformation.

Accessibility and Affordability of connectivity in underserved and unserved Family Islands is not to be underestimated as a general priority for 2023 as it brings the considerations of all stakeholders into focus on the challenges of financing and affordability including opportunities for Public-Private Partnerships, foreign investment and waivers of the taxation elements in telecommunications as well as reduced taxation of telecommunications companies, all of which must be taken into consideration in the era of declining profits for operators due to robust competition and grey market threats and intrusions and a less attractive investment market due to the high costs of new networks (fibre optic and 5G wireless) and spectrum. These are elements which must be given serious consideration with all of the stakeholders involved in the decision making process in order to determine the most beneficial outcomes for our country. It remains to be seen whether the proposed reductions in the Communications Licence Fee as per the Order of the Minister with Responsibility for the ECS in May of 2022 followed by the Public Consultation on the Guidance Note to implement these reductions issued on the 2<sup>nd</sup> December 2022 will have sufficient incentives for operators to deem it attractive and feasible to expand "emerging technology" networks into some Family Islands and whether the reduction is actually a reimbursement. The Group is also curious as to the implications of the amended Schedule 3 of the Communications Act for the establishment of a Universal Service Fund which has been delayed for at least seven years! The ECS Sector Policy for the next three years (2023 -2026) is a timely opportunity to capture the new administration's policy objectives and decisions so that participants in the sector will know what to expect and where they stand.

### **Sector Priorities for 2023-24**

We agree with URCA that digital transformation and integration is a journey and that its acceleration has changed the world which is challenged to adjust to the new normal. We acknowledge the work yet to be done to address the challenges regarding accessibility and affordability of connectivity and access in many of the Family Islands but the objective will be challenged to advance the cause in the absence of work plans. The development of a new ECS Sector Policy that reflects the Government's vision and objectives for the

sector for the next three years will be mere impressive words on paper as evidenced by the 2020-2023 Sector Policy, albeit the pandemic's intervention and shutdown played a part in the delays. We urge that working groups are made to put their noses to the grindstone as an approach, and returns on investments from those sent to conferences and training in the form of tangible contributions to the actual work that must be done is mandatory.

### **2022 Projects carried over**

URCA's earlier statement regarding the causes for the carry-over of projects from 2022 are noted although as Licensees we also have similar challenges particularly with unexpected employee turnover but nevertheless are required to meet our licensee obligations. URCA should deliberately seek to avoid circumstances in which a significant amount of the Plan projects are abandoned or not completed as and when intended as this has implications, sometimes serious, for delayed progress of the sector.

The 2022 carry over of six projects is not a good reflection and we note that one of the 2022 projects, a Review by URCA of its position on OTTs was not commenced and appears to have been abandoned in 2023 without explanation. It would be good if URCA could provide its reasons for same. Further, the review of the Universal Service Framework was a to-do item in the 2020-2023 ECS Sector Policy which required URCA's attention....such an important review in our view has taken far too long.

The reinstatement and expansion of URCA's collaborative regulatory approach, initiated in 2021, which will seek the engagement of a cross section of ECS stakeholders, regulators and critical national and international agencies to expose (and explore) different perspectives on critical issues is extremely important and URCA is applauded for this progressive approach particularly given the pressures on the ECS and the Licensed Operators to provide the infrastructure and networks to support new services including high speed fibre broadband, 5G, Smart Cities, IoTs, Technology Hubs etc. Certainly a more relaxed regulatory framework is beneficial to all in the sector. The changing face of the telecommunications investment model requires all relevant stakeholders to sit and collaborate for a mutually beneficial outcome for all.

### **URCA's General Priorities /Government & International Relations Priorities 2023**

URCA's list of three 2023 General Projects is agreeable and we have noted as aforesaid the Government and International Relations priorities which will include the formation of a unit to focus on "regulated strategic imperatives" (although we would like this term to be further explained/defined for the purposes of the Plan !). We do repeat however, our call for sufficiently informative annual reports to the sector given the increased costs to Licensees. We also note the intention of the Unit to work with the Bahamian Ambassador

in order to advance the ICT policy objectives of the Government through the ITU, OAS, CITELE and the CTU. (We have previously commented on the omission of CANTO from this list) and the intention to form greater alliances with other SIDS for “universally beneficial growth development”, HOWEVER, we caution that flying off to conferences and meetings will be for naught if a vehicle is not established within our country between URCA, Licensees, and relevant Government Ministries to perform the “grunt” work and to lay the ground work, the mission objectives and the action plans and to take concrete steps to do the hard work to turn paper projects into a reality. Travelling incessantly beyond a point becomes counter productive to the hard work necessary to create the structures needed to achieve the results. And , of course, we heartily support educational sessions and updates for relevant Ministry officials.

### **The List of ECS Projects for 2023**

URCA has listed eight Tier 1 projects, six of which are reviews, and reflective of a maturing market. There are also an additional two consultations not listed by URCA in the 2023 Plan but rather as additions to the Project Plans, namely ECS57/2022 , published on 2<sup>nd</sup> December 2022, (Guidance Note for the Reductions in the Communications Licence Fees), with responses due on January 30<sup>th</sup> 2023 and ECS01/2023, published on January 13<sup>th</sup> 2023 on the National Alert Warning System. Given the length of this ambitious list and URCA’s performance to date, it is reasonable to infer that many of these projects will be carried over into 2024 and beyond.

As the Group did last year, we are immediately and urgently constrained to highlight the Review of Fixed Retail Services including the Pay TV service which awaits a review that is critical given the status of Paid TV services , acknowledged by URCA in the 2022 Annual Report to have shown the steepest decline in subscribers at 11% year over year. The review has implications for the Significant Market Power Designation which is screaming for removal with the competition from the grey markets such as Netflix, Hulu etc. and the addition of competition in this market since 2016. This review has been listed and subsequently cancelled on an ongoing basis since 2018. When reviews are consistently postponed, data collected for the purpose of the review becomes stale dated and must be collected again. At the present time Rev is not optimistic that the Review will be completed with a Final Statement of Results by T3 of 2023 as indicated by URCA. The Group calls for the escalation of this review in the Plan so that it can be addressed with the urgency which it deserves.

We note also the Review of Consumer Protection Regulations which was abandoned for the ECS in mid-review in 2021 is now back on the list of 2023 projects and we inquire as to the reasons for its reappearance.

It may be also that a Review of Universal Service Obligations Framework and Implementation scheduled for T1 2023 should coincide with the completion of the work on the new 2023-2026 ECS Sector Policy. The Review of Licences due to expire in 2024 in order to determine whether they remain fit for purpose after 15 years is timely and appropriate.

Tier 11 Projects which do not have the same priority of Tier 1 projects consist of only two projects, the focus being on the National Spectrum Plan for 2024-2027 which is of the utmost importance to the sector with a start date of T2 2023. The revised Spectrum Plan will be most relevant to wireless networks in particular, including 5G and the new and fast developing satellite to mobile industry which is being pushed globally by new commercialized satellite companies and cannot be ignored. The Group, as have indeed many telcos globally has been advocating for a review of the spectrum rules and pricing and the removal of the Premium Spectrum category which charges significantly higher fees for what is determined to be premium band spectrum. Given that the Government and relevant Minister is responsible for determining spectrum fees etc. certainly this is a project which requires that URCA educate the relevant officials on recent global approaches to policy in the spectrum area so that informed decisions may be made. As cellular mobile operators begin to prepare their business cases for 5G services the expeditious completion of this new national spectrum plan is essential.

The Group wishes URCA well in successfully marshalling these planned projects through 2023 with the minimum of delays.

#### **4. KEY PERFORMANCE INDICATOR MEASURES FOR 2023**

Finally, as we have historically done , the Group supports URCA in its stated intentions to effectively measure its impact on the regulated sectors through the full introduction of its Organization Performance Index (OPIs) and the usual key performance indicators (KPIs) We are pleased to note in Table 4.3 under URCA's K.P.I.s on learning and development, two specific KPIs on learning and development, however, we are of the view that it may be beneficial to add one or two more on said topic as an incentive to staff, given that one of the original K.P.I.s is associated with the cost to the payroll. However, as it has done in its previous responses the Group caveats this support and underscores it with the need for URCA to put in place a tool to measure the assessment by the Licensees concerning URCA's performance or at the least introduce a tool for Licensees to provide feedback. It is curious why URCA continues to ignore this proposal and again we say that self-evaluation, even if based on objective measures cannot provide a



complete assessment to URCA of its performance as per the Licensees. Implementation of such a tool is certainly in alignment with URCA's listed strategic goals.

### **Sector Statistics**

On a subject not included in the Draft Annual Plan for 2023 but an important part of the Annual Report for 2022 together with the Final Plan for 2023 when published, is the group's concern that the annual statistics for the sector, compiled by URCA from quarterly reports etc. are not being given the importance that they require. Licensees depend on these statistics as, we are sure other Stakeholders and observers do, to be able to determine progress or decline in services and to use them in reports. The reports collected from Licensee should allow URCA to provide abundant statistical information on the sector. Indeed early in 2022 the Group's Executives were dismayed to see the IDB issue a report on penetration rates with The Bahamas being reflected poorly compared to what we knew to be the actual. Inquiries revealed that the statistics were outdated. We do not, of course, imply that this was the fault of URCA. The Group does intend however, after the ITU's Plenipotentiary in Bucharest last September, to become more actively involved with the Telecommunications Bureau for Development at the I.T.U., headed by Dr. Cosmos Zavazava. We are also committed to working collaboratively with URCA to share the most updated statistical information so that we can be correctly represented internationally. We look forward to this component of the Annual Report for the specified year becoming more informative on the sector's performance.

## **5. THE BUDGET FOR FISCAL YEAR 2023**

URCA is mandated to publish its annual draft budget for each fiscal year and this item is of particular interest for Licensees of URCA as it forms the basis for URCA's calculation of Licence fees and several other calculations.

The Group is astounded with the presentation of this year's draft Budgets' figures/amounts, both the combined ECS and ES draft Budgets and the individual ECS budget. URCA's significant increase in the Budget amounts for 2023 in the absence of detailed explanations or justification is a cause for great concern to Licensees. The days of telcos being a "cash cow" are decidedly over and the mantra of the industry today is fiscal restraint and the reduction of administrative and operating costs. There is increasing financial pressures to maintain existing networks, invest in expensive upgrades and provide new and more costly networks and services. Given the archipelagic nature of our country and the relatively small population, telecommunications is an expensive venture and with robust competition profits necessary for reinvestment are on the decline. URCA's

draft 2023 Budget reflects an “It is what it is” approach with little consideration for the changing financial dynamics of the sector and the challenges faced by licensed operators.

Given that this is a draft Budget and the fact that there can be no reasonable justification for a 23% overall increase in the combined Operating Budget, URCA is urged and encouraged to REDRAFT the 2023 Combined Budget with the object of reducing the \$7,958,657.00 total operation expenditure to be recovered from Licensees which is \$1.26m over the prior year 2022 of \$6,698,000.00 and bring it more in line with 2022’s budget with, at the very most, a minimal 5% to 10% increase year over year. Indeed, the excessive Budget increases being imposed on Licensees, combined with increasing attempts by URCA to impose fines which are disproportion to the alleged matter for which the fine is being applied, amounts to an assault on the finances of Licensed Operators in the sector.

URCA undertakes to provide a “full accounting” (URCA’s words) as per Section 41 (ii)(b) of the URCA Act however, the deficient Budget increase explanations or the non-existent explanations can in no way be regarded as a “full accounting” and it may be that Licensees will be forced to resort to “challenging” the budget by various means. A blaring example is the Non-Executive Compensation item which has increased year over year by over 100% from \$184,000.00 to \$408,000.00 (Combined) and \$110,400.00 to \$249,600.00 (ECS only) WITHOUT explanation. Certainly such an increase is lacking in transparency and accountability absent a valid explanation to Licensees who are obligated to pay for same. Added to this is the Premises and Utilities costs item which shows a 48% increase year over year and which includes preventative maintenance for Frederick House. Maintaining Frederick House is not sustainable and its sale must be on the table for serious consideration.

Capital Expenditure of \$2,861,500.00 (Combined), \$2,368,528.00 of which is attributable to the ECS Budget is unacceptable given prior year 2022 being \$675,000.00 (Combined) and \$532,400.00 (ECS only) which at that time was deemed excessive. The Group in its Response last year urged URCA to sell Frederick House building which has been an albatross around the finances of Licensees who must pay for the original poor decision to purchase such an ancient building. The explanation that the expenditure is for the replacement of the elevator and generator and “smaller scale projects”, the latter having no details, is excessive in one year and must be spread over a three year period. The ongoing failure to secure tenants for the building, a selling pitch to Licensees, in all the years since purchase resulting in the burden being assumed by Licensees is unacceptable particularly as the building will continue to require major maintenance.

Again, Conference Travel and Training's leap from \$96,521.00 to \$ 627,500 (566% increase) "due to the reallocation of the majority of the 2022 budget to fund regulatory campaigns" which were clearly not anticipated in the 2022 Budget should, at the very least, cause the hosting of two regulatory fora to be rescheduled away from 2023 to eliminate further excessive spending and bring this budget item down to a reasonable amount. And whilst Professional Services has increased in the combined Budget by 51% we note the decrease in the ECS Budget from the 2022 allocation.

Again, a 45% (combined Budget) for Office Services year over year is too large an increase and we query the need for a credit facility.

URCA must be mindful that it cannot continue year after year with Budget increases without consideration for the financial pressures imposed on Licensees by other forms of taxation. The budget increases diminish the effectiveness of waivers in customs duties for telecommunications equipment in the National Budget. It is regrettable that, in hindsight, whilst the original Section in the URCA Act allowed URCA with regard to fees collected from Licensees to: (2) ... retain any excess sums collected under ss (i) for application the following financial year or years", to have been repealed and the amendment to said Act on the 1<sup>st</sup> July 2013 instead: "...at the end of each financial year pay into the Consolidated Fund all surplus funds standing to the credit of URCA.." This was a shortsighted amendment, not only because it constrained URCA financially but because it also deprived Licensees of credit for fees paid in good faith towards the ECS Sector's regulation by URCA which were in excess of what was estimated and therefore ought rightfully and legally to have been returned to Licensees by way of credit or placed into a pot/bank account for direct benefit to the ECS. A look at Trinidad and Tobago's Universal Service Fund is instructive. The Fund in mid-2022 stood at TSTT\$120m (\$US20m). The T&T 2001 Communications Act provided for all excess licence fees to be placed in said fund and in addition, since 2015 Licensees pay 1% on international gross revenue and 1/2% on domestic gross revenue into said Fund.

To date, The Bahamas has no Universal Service Fund. Preparation work has started and stopped over the years and the data collected is now outdated. Excess licence fees and fines could have been deposited in such a fund to assist the ECS operators in the development and expansion of Family Island networks which is of the utmost importance given the archipelagic nature of our Commonwealth. Such forward thinking would have lessened the need for the Government to introduce duty waivers as a concession for expensive build outs with low rates of return on investment.

## **6. DESCRIPTION AND PROGRESS UPDATE ON THE 2023 ANNUAL PLAN**

The Group notes the General Projects to be undertaken in 2023 including, the implementation of URCA's OPIs; The Market and Consumer Project Surveys; the publication of the Annual Plan; the selection of an indirect costs allocation system for the ECS and the ES budgets (this is somewhat disturbing as the assumption is that this was in place in some form), and the Digital Transition Project. The latter involves a focused and comprehensive public education and engagement campaign to create more "enlightened" subscribers and we commend URCA for this initiative. The revamping of URCA's website to increase functionality and ease of website navigation and quality content is welcomed and is overdue given the challenges for users. We take the opportunity to point out to URCA that a notification tool for licensees to be informed of important postings as occurred in one of the past iterations would be most welcome.

URCA states that it had committed to undertaking ten (10) ECS related projects in 2022 and we have noted that the majority of them have been carried over into 2023 with implications for the completion of the 2023 Plan projects.

The Group awaits the publication of URCA's recommendation on the market assessment of the feasibility of a third mobile operator, given that the assessment phase is completed and recommendations were expected by the end of 2022 and particularly given the extensive work and research that the Group put into its submission.

We query the omission of the Review of URCA's position on OTT services listed in the 2022 Annual Plan of ten ESC related projects (6.2) but dropped without explanation from the 2022 carry over projects. We are of the view that such a review would be of assistance and inform URCA having regard to the Review of Fixed Retail Services and of Paid TV services in particular.

As we write, we note the unexpected addition of the Public Consultation ECS 57/2022 Guidelines for the Reduction of the Communications Fees in December of 2022 and the further addition on January 13<sup>th</sup> 2023 of the Public Consultation ECS 01/2023 The National Alert Warning System, neither of which were on Annual Plan lists. It would have been helpful had URCA provided an indication that they were to be published as licensees do have other responsibilities to attend to.

The Group regards the 5G Public Consultation to which Responses have been submitted, the Review of Licenses due to expire in 2024 and the presentation of the

revised draft Sector Policy (2023-2026) to the Minister following on the expiration of the present Sector Policy in March 2023 as significant pieces of work. We again urge URCA to proceed as a priority with the Review of the Fixed Retail Market for Paid TV which has been promised since 2018 and is now designated to be completed as indicated in the draft Plan by T2 2023.

## **7. CONCLUSION**

URCA has undertaken quite an impressive work load for 2023 both internally and for the sector. URCA has also referred to the shortage of staff which impacted its work performance in 2021 and 2022, in particular. The hiring process takes time and there is usually a learning curve and so we caution URCA not to overload itself so that even more projects are carried over into the following years and the entire annual project plan becomes cumbersome and unmanageable. Whilst we appreciate that URCA cannot pause in order to catch up, serious consideration must be given to URCA's ability to complete projects in a timely manner, not least because time lapses lead to stale data. We also respectfully remind URCA that Licensees have a business to run for profit with network operations, new services, subscriber management, hundreds of staff to manage, Quarterly reports to prepare and send to the regulator etc. Time management is paramount in Licensee operations and URCA's Plan projects should take these Licensee obligations into consideration and ensure that the workload is not unduly burdensome on Licensees, particularly given the recent propensity to issue unexpected public consultations, surveys and requests for information.

The Group would also like to propose that as there is historically a seven week response time for the draft Plan, that URCA schedule its Stakeholders' Forum on said draft Plan to be held no less than 3 weeks prior to the response due date in order to allow for queries and clarifications to be incorporated into the response.

Ideally the Group would like to see all projects completed within the year that they appear in the Plan with carryovers being the exception rather than the rule. We all have a common objection to see our sector improve and demonstrate best global practices in regulation and to have the best information available upon which to make decisions. We are happy to work with URCA towards achieving such objectives and it is with this spirit of collaboration that the Group submits this Response.

**Respectfully submitted,**

**On behalf of CBL and ALIV**

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