



# **Fair Trading Commission**

**Analysis of Cable & Wireless (Barbados) Limited  
Annual Standards  
of Service Report**

**April 1, 2021 - March 31, 2022**

December 13, 2023

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## INTRODUCTION

This report analyses Cable & Wireless (Barbados) Limited's ("C&W") Standards of Service performance from April 1, 2021 to March 31, 2022. Analysed herein are the Guaranteed Standards of Service (hereinafter referred to as "Guaranteed Standards" or "GTS"), which measure C&W's compliance in relation to the standards of its fixed-line services. Failure to meet a Guaranteed Standard requires C&W to compensate the affected customer. Thus, this report also documents C&W's compensation to customers for the period under review while also comparing compensation paid to consumers from 2019 to 2022. Included in the reporting of customer claims is analysis of the number of customer claims eligible for compensation and actual compensation paid.

This report also analyses Overall Standards of Service (hereinafter referred to as "Overall Standards" or "OTS"). Overall Standards measure C&W's efficiency in delivering its regulated services to its customers at the national level.

The analyses in this document are a continuation of the Commission's approach which has been used since the establishment of the Standards of Service regime. The target applied to each standard has been informed from public consultation where all stakeholders had the opportunity to participate. With respect to a threshold of non-compliance where there is no specific target, the Commission makes an informed determination based on previous enforcement experience since the imposition of the Standards of Service framework, to determine whether C&W's performance is satisfactory.

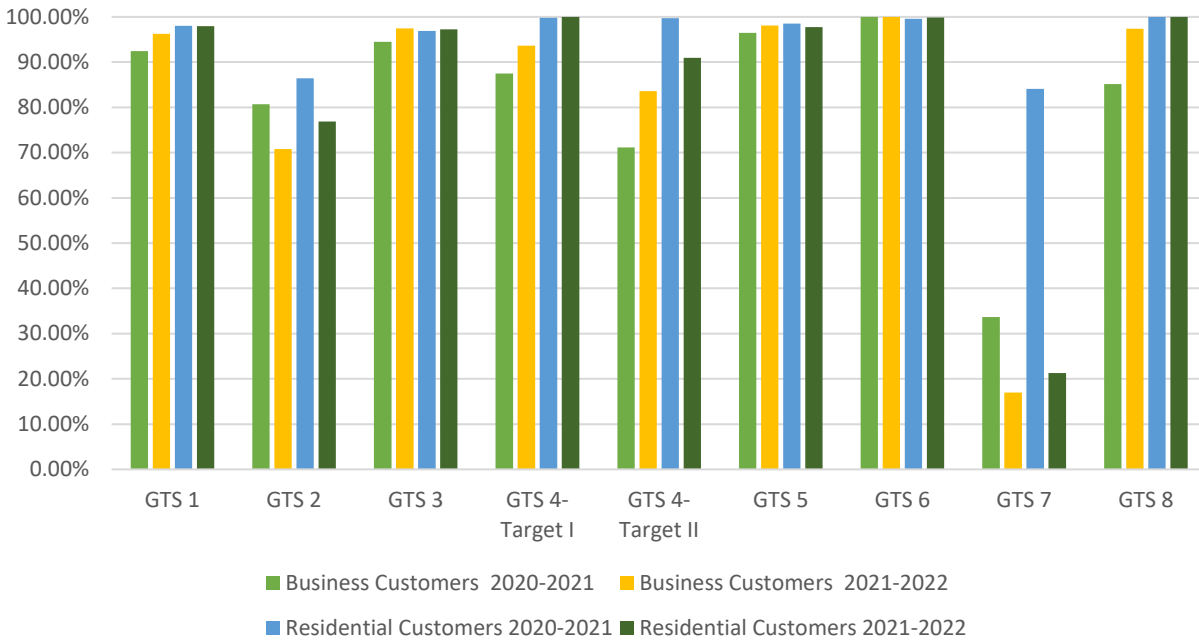
## 1.0 GUARANTEED STANDARDS OF SERVICE

This section contains a review of C&W's compliance with regard to the eight (8) categories of Guaranteed Standards. Each Guaranteed Standard is assessed based on the percentage of compliance, and is compared to the level of compliance in the previous review period. Failure to meet Guaranteed Standards requires C&W to compensate each affected customer via credits to their accounts. For most Guaranteed Standards, a breach results in automatic compensation.

Another consideration worthy of note is the difference which occurs between eligible compensation and actual compensation paid. This occurs because credits are normally applied to customers' accounts in the month following the confirmation of the breach of the Standard, and for that reason, actual compensation and eligible compensation for the review period may differ.

Captured in **Figure 1** is C&W's performance from April 1, 2021, to March 31, 2022. Note, the level of compliance is divided into two categories, namely, compliance with regard to residential customers and business customers. Discussed herein are the different targets which apply to each category of customer for each Guaranteed Standard.

## Guaranteed Standards of Service Compliance Rates



GTS 1 - Installation or Transfer of Service  
 GTS 2 - Fault Repair  
 GTS 3 - Repeated Loss of Service  
 GTS 4 - Response to Customer Complaints  
 GTS 5 - Customer Appointments  
 GTS 6 - Reconnection after Disconnection for Non-payment  
 GTS 7 - Wrongful Disconnection  
 GTS 8 - Billing Accuracy

GTS 4 Target I - acknowledgement of complaints forwarded by registered mail shall occur within seven (7) working days of receipt of the complaint. Complaints delivered to C&W's head office on its approved official complaint form must be acknowledged immediately.

GTS 4 Target II - acknowledgement of telephone, fax or email complaints shall occur within five (5) working days of receipt of the complaint.

**Figure 1: Guaranteed Standards of Service Compliance Rates (April 2021-March 2022)**

### GTS 1 - Installation or Transfer of Service

GTS 1 refers to the time taken between the customer’s application for a new service or a transfer of service and the actual installation or transfer of service. The targets for compliance are as follows:

- i. **Business customer** – service installation or transfer should take no more than five (5) working days.

- ii. **Residential customer** – service installation or transfer should take no more than seven (7) working days.<sup>1</sup>

**Table 1: GTS 1 Installation or Transfer of Service Compliance Rates**

April 1, 2020 – March, 30, 2021		April 1, 2021 – March 31, 2022	
Business Category	Residential Category	Business Category	Residential Category
92.46%	98.00%	96.26%	97.93%

***Business category***

For the year under review there were 10 reported breaches resulting in an average compliance of 96.26%, compared to 92.46% in the previous period, a difference of 3.80% in compliance.

***Residential category***

For the residential category, there were 43 reported breaches resulting in an average compliance of 97.93%, a marginal decline of 0.7% in compliance when compared to the previous period.

**GTS 2 - Fault Repair**

This Standard requires that faults due to failure of C&W’s network/equipment are corrected in no more than two (2) days for both residential and business customers. This does not include faults which result from customer-owned equipment or the inside wiring at the customer’s residence.<sup>2</sup>

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<sup>1</sup> “Working Days” refers to Mondays to Fridays from 8:00 a.m. to 4:00 p.m. only and excludes public holidays and weekends. In measuring the response time for targets expressed in terms of working days, the day the complaint is made is excluded. Any other reference to days means calendar days.

<sup>2</sup> ‘Fault’ and ‘Loss of Service’ have the same definition.

**Table 2: GTS 2 Fault Repair Compliance Rates**

April 1, 2020 - March, 30, 2021		April 1, 2021 - March 31, 2022	
Business Category	Residential Category	Business Category	Residential Category
80.71%	86.42%	70.78%	76.87%

***Business category***

C&W reported 411 breaches, resulting in an average compliance of 70.78% compared to 80.71% in the previous period. C&W attributed the decline in its performance to the impacts of the “freak storm” which occurred on between June 15 -16, 2021. The storm caused power outages, fallen trees and infrastructure damage and disruptions due to severe thunder showers with over 4,7000 lightning strikes in an hour, high winds, and heavy rainfall. In light of nature of the event, C&W compliance is considered under *force majeure*.

***Residential category***

Compliance for the residential segment averaged 76.87%. There were 2,747 breaches in total, 43.42% of which occurred in the month of July - the aftermath of the aforementioned storm in June.

**GTS 3 - Repeated Loss of Service**

Loss of service is defined as disrupted or degraded service including, inter alia, no dial tone. This Guaranteed Standard dictates that there should be no reoccurrence of a fault of the same nature on C&W’s network within 30 days of occurrence of the original fault.

**Table 3: GTS 3 Repeated Loss of Service Compliance Rates**

April 1, 2020 - March, 30, 2021		April 1, 2021 - March 31, 2022	
Business Category	Residential Category	Business Category	Residential Category
94.50%	96.88%	97.43%	97.26%



### *Business category*

During the period under review, the business category saw an increase in compliance. Compliance for the period was 97.43% compared to the previous result of 94.50%. There was a total of 29 breaches for the year.

### *Residential category*

Compliance in the residential category was 97.26% with 362 breaches; a marginal improvement was recorded.

## **GTS 4 - Response to Customer Complaints**

This Standard stipulates the maximum allowable time in which C&W shall acknowledge a customer's complaint relating to billing, malfunctioning network or quality of service. An acknowledgement occurs when C&W communicates to the customer orally, in writing or electronically that it has received their complaint. The targets for compliance are segmented in two general categories as follows:

- i. **Target I**— acknowledgement of complaints forwarded by registered mail shall occur within seven (7) working days of receipt of the complaint. Complaints delivered to C&W's head office on its approved official complaint form must be acknowledged immediately.
- ii. **Target II**— acknowledgement of telephone, fax or email complaints shall occur within five (5) working days of receipt of the complaint.

**Table 4: GTS 4 Response to Customer Complaints Compliance Rates**

April 1, 2020 - March, 30, 2021				April 1, 2021 - March 31, 2022			
Business Category		Residential Category		Business Category		Residential Category	
Target I	Target II	Target I	Target II	Target I	Target II	Target I	Target II
87.50%	71.14%	99.82%	99.75%	93.62%	83.63%	100%	90.95%

***Business category***

The level of compliance for Target I and Target II were 93.62% and 83.63% respectively, compared to 87.50% and 71.14% for the corresponding targets in the previous period. For the period under review there were 11 breaches under Target I and 169 breaches under Target II. Although 83.63% is a relatively high level of compliance, 169 breaches that affect businesses, when considered in context, gives some cause for concern.

***Residential category***

Compliance for Target I and Target II were 100.00% and 90.95% respectively. C&W's 100% performance under Target I and 36 breaches under Target II with a 90.95% performance do not raise any compliance concerns.

**GTS 5 - Customer Appointments**

This Standard covers scheduled appointments by C&W's agents to correct faults on the network where access to customer premises is necessary but restricted. The appointments are to correct faults on the C&W's network up to and including the network interface device. Appointments are to be kept but may be rescheduled upon notifying the customer at least eight (8) hours prior to the scheduled appointment. All customer appointments should be honoured with the following compliance targets:

- i. Appointments may be scheduled: Morning (8:00 a.m. to 12:00 noon) or afternoon (12:01 p.m. to 4:00 p.m.)
- ii. Appointments may be rescheduled; however, the customer must be notified at least eight (8) working hours prior to the scheduled appointment.

**Table 5: GTS 5 Customer Appointments**

April 1, 2020 - March, 30, 2021		April 1, 2021 - March 31, 2022	
Business Category	Residential Category	Business Category	Residential Category
96.45%	98.50%	98.07%	97.72%

***Business category***

There were 27 breaches in total for the year. These breaches, translate to an average compliance of 98.07%. This is also a marginal increase in compliance compared to the previous period, which had an average compliance of 96.45%. Overall, this is a high level of compliance.

***Residential category***

With 349 breaches and an average compliance of 97.72%, when considered in context, the marginal decrease of 0.78% in compliance compared to 98.50% in the previous period does not raise compliance concerns.

**GTS 6 - Reconnection after Disconnection for Non-Payment**

This Guaranteed Standard requires that both residential and business customers be reconnected within six (6) working hours<sup>3</sup> of notification of payment.

**Table 6: GTS 6 Reconnection after Disconnection for Non-Payment**

April 1, 2020 - March, 30, 2021		April 1, 2021 - March 31, 2022	
Business Category	Residential Category	Business Category	Residential Category
100.00%	99.55%	100.00%	99.84%

***Business category***

There were 40 instances of disconnections and all were resolved within the target-time, resulting in 100% compliance (the same level of compliance in the previous period).

***Residential category***

For this category, there were 61 breaches and an average compliance of 99.84%. This is a marginal increase of 0.29% in compliance compared to 99.55% in the previous period, a commendable performance.

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<sup>3</sup> "Working hours" are between 8:00 a.m. and 4:00 p.m. on a working day.

## GTS 7 – Wrongful Disconnection

This Guaranteed Standard refers to the loss of service due to system errors by the service provider. The target for residential and business customers is reconnection within one (1) working hour of notification by the customer. Note, this does not apply where disconnection arises out of circumstances pertaining to an overdue amount.

**Table 7: GTS 7 Wrongful Disconnection**

April 1, 2020 – March, 30, 2021		April 1, 2021 – March 31, 2022	
Business Category	Residential Category	Business Category	Residential Category
33.66%	84.08%	17.00%	21.29%

### *Business category*

Performance in this category has been less than satisfactory with significant decline in compliance compounded by an already poor performance in the prior period. C&W's stated reason for its 17% compliance is the same as last period, which is cited below.

### *C&W's justification for not meeting target*

C&W's justification is the same as the last quarter. C&W said the following:

*"Customers are calling the Contact Centre to report these disconnections. Because they are business accounts, if they are not straightforward issues, the [Contact Centre] escalates to the business Support teams for investigation. This process usually takes more than an hour and so the standard cannot be met."*<sup>4</sup>

### *Residential category*

C&W's performance has been less than satisfactory. According to C&W:

" Though recording average times in excess of one hour, the majority of recorded breaches did not arise due to the fault of the company. Payments in these instances were made through a third party and not recorded on our system at the point of disconnection.

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<sup>4</sup> Cable and Wireless (Barbados) Limited. FTC Reporting Notes Q3-2021.pdf

These require investigation to track and apply the payment to the account and in most cases this process would inevitably mean the one working hour deadline is missed on this standard.”<sup>5</sup>

**GTS 8 - Billing Accuracy**

This refers to the incidence of billing errors on customers’ individual billing statements. The target for residential and business customers is that billing errors are to be corrected within thirty (30) days of notification by the customer.

**Table 8: GTS 8 Billing Accuracy**

April 1, 2020 - March, 30, 2021		April 1, 2021 - March 31, 2022	
Business Category	Residential Category	Business Category	Residential Category
85.15%	100.00%	97.37%	100.00%

***Business category***

For the period under review average compliance stood at 97.37%, a marked improvement over 85.15% in the previous period.

***Residential category***

Full compliance was again achieved over this period.

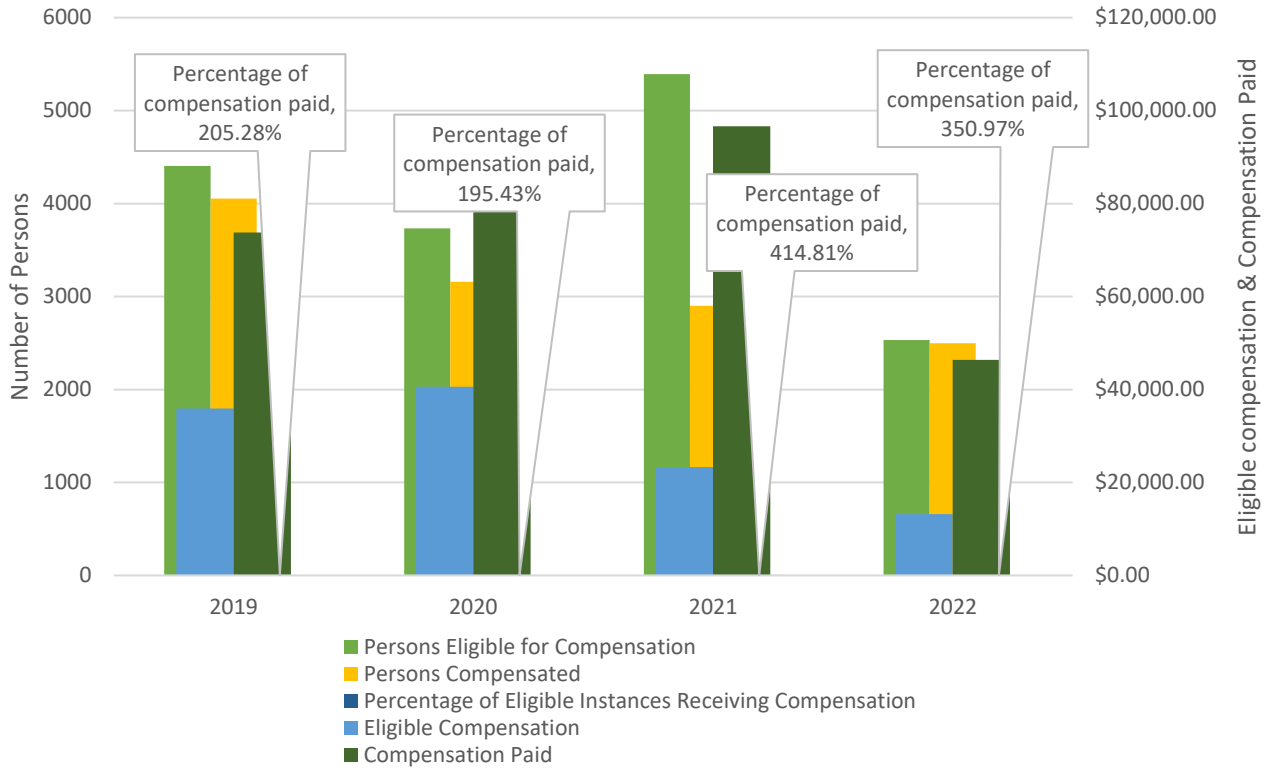
**Customer Claims Summary**

Customers are compensated by direct credit to their accounts for breaches of Guaranteed Standards of Service. **Figure 2** shows compensation for 2019 to 2022. In 2021 and 2022, C&W paid out \$96,360 and \$46,380, respectively. In 2021, there were 5,391 persons eligible for compensation, whereas in 2022 there were 2,533 persons. As eligible compensation is

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<sup>5</sup> Ibid.

usually brought forward from one period to another due to the lag in settlement of claims, one sees that the percentage of compensation paid normally exceeds 100%. See **Figure 2**.

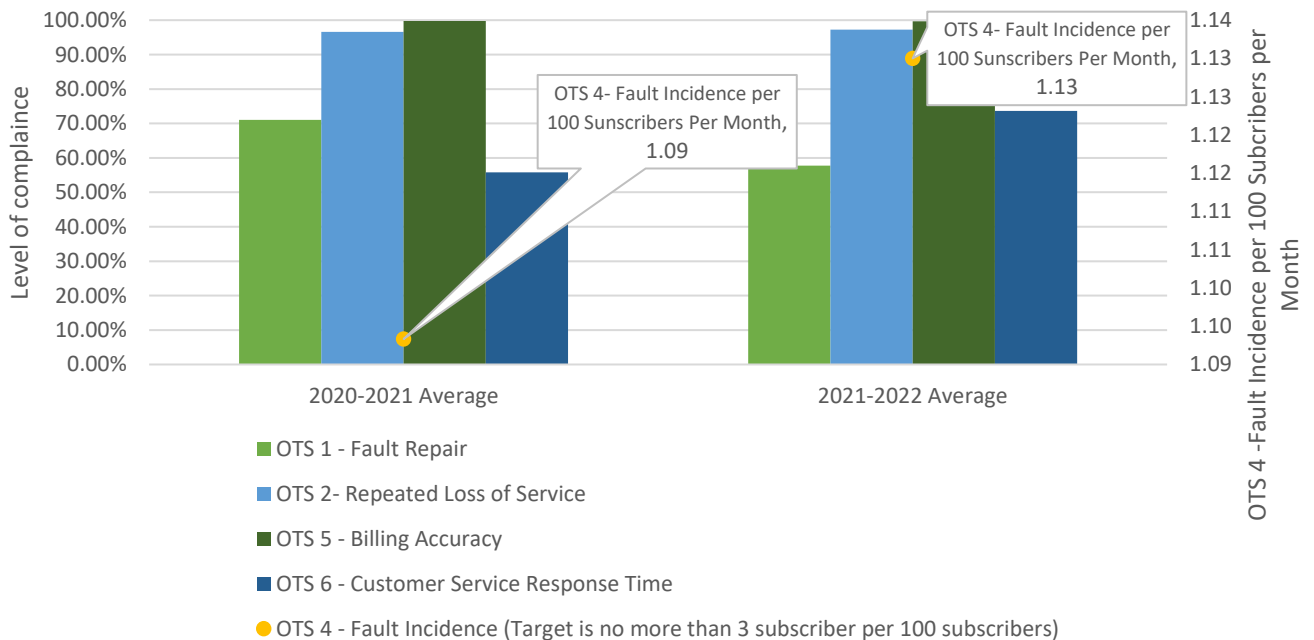


**Figure 2: Customer Claims Summary (2019-2022)**

## 2.0 OVERALL STANDARDS OF SERVICE

Overall Standards of Service (OTS) assess C&W's performance at the national level. Similar to Guaranteed Standards, it covers the provision of fixed line telephony services, however there is no compensation to individual customers in the event of a breach. Where a breach persists, the Commission may invoke Section 43 of the Fair Trading Commission Act, CAP. 326 of the Laws of Barbados and Sections 31 and 38 of the Utilities Regulation Act, CAP. 282 of the Laws of Barbados, which allow for the imposition of fines.

As was the case in the previous period, **Figure 3** shows deficiencies in compliance with regard to breaches in OTS 1 and OTS 6.



**Figure 3: OTS Compliance Rates (April 2020-March 2021 and April 2021- March 2022)**

## **OTS 1 – Fault Repair**

The target for this Standard is that at least 80% of faults should be repaired within the first 24 working hours of reporting. For the period ending March 31, 2022, average compliance was 57.73%, a decline from 71.09% in the previous period. As the approved target is 80%, failure to meet that mark in this instance is less than satisfactory.

### **C&W's justification for not meeting the target**

According to C&W:

*“An increase in fault report volumes in June due to the "Freak storm" on June 16th 2021. This was followed directly by an issue impacting voice services where legacy equipment was affected due to loss of power.”<sup>6</sup>*

## **OTS 2 – Repeated Loss of Service**

This Standard refers to the repeated or frequent loss of phone service resulting from a fault of the same nature within thirty (30) days of the occurrence of the original fault. The target for this Overall Standard is 95% compliance. The average compliance for the period under review was 97.23%, marginally higher than 96.61% in the previous period. As C&W continues to meet this target there are no compliance concerns.

## **OTS 3 – Working Payphones**

This Standard refers to the number of payphones which are fully functional on a daily basis. The compliance target for working payphones is 75%. C&W's report indicates that no data for payphones was submitted for the period under review and as such this is recorded as 'N/A' for the period. NB: C&W no longer utilizes an automatic Payphone Management System as the revenue from payphones does not support the cost. Instead, C&W relies on manual reports from G4S coin processing. Given the ubiquity of mobile services and the highly diminished use of payphones, consideration will be given to the

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<sup>6</sup> Cable and Wireless (Barbados) Limited. (2021, July). FTC Reporting Rebates and Notes Q2-2021(002).pdf



removal of this Standard. Even though C&W is currently tasked with the provision of universal service, including payphones, global ICT trends suggest an evolution of universal service to include broadband, while acknowledging that payphones are fast approaching obsolescence.

#### **OTS 4 - Fault Incidence**

This measures the percentage of faults occurring on C&W's network. The minimum acceptable level of performance is no more than three (3) faults per 100 subscribers per month (i.e. a fault rate of no more than 3% per month). Average compliance for this review period was 1.13, compared to 1.09 in the previous period. C&W continues to meet this target with satisfactory performance.

#### **OTS 5 - Billing Accuracy**

This reflects the accuracy of the service provider's billing system. This Overall Standard allows for an inaccuracy rate of no more than 0.5% for all issued bills. The average percentage compliance for the period ending March 31, 2022 was 99.70% - almost identical to the previous period which calculated at 99.74%.

#### **OTS 6 - Customer Service Response Time**

This Standard stipulates the target for the time taken by a customer service representative to answer a call after it is handed off by the interactive voice response (IVR). At least 80% of the calls must be answered within sixty (60) seconds of hand-off from the IVR system. C&W achieved 73.62% compliance under this Standard for the period ending March 31, 2022. In the previous period, compliance was 55.81%. Though this is an improvement C&W nonetheless falls below target. C&W attributed its low performance to a "...combination of outages and staffing challenges due to covid isolations (sic)."<sup>7</sup>

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<sup>7</sup> Cable and Wireless (Barbados) Limited. (2021, October). FTC Reporting GTS Notes Q3-2021.pdf

### 3.0 SUMMARY

This report assessed C&W's Standards of Service performance. Performance under the Guaranteed Standards were, for the most part, similar to the previous review period and is generally considered to be commendable with the exception of GTS 7, wrongful disconnection. C&W claims that the cause for the poor performance was that all queries needed to be thoroughly investigated in order to verify the claims. This led to significant delays in the resolution of all matters. As it relates to the Overall Standards of Service however, C&W's performance was again affected by the social and economic fallout from the COVID-19 pandemic. Certain Standards such as OTS 6 continue to miss the target due to deficiencies in staffing caused by the pandemic.

On average, C&W continues to perform satisfactorily with respect to the Standards of Service. Staff is of the view that many of the problems identified herein stemmed from the challenges which ensued from the global response to the COVID-19 pandemic. Staff will continue to monitor all Standards to ensure C&W remains compliant. In order to ensure continuous improvement, there may be the need to institute a compliance plan for areas where there are deficiencies in performance.