



Discontinuation of the Bermuda Telephone Company Limited Copper Network

Consultation Document

Matter: 20260924
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Responses Due: 9 November 2026

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1. INTRODUCTION

1. The Regulatory Authority of Bermuda (**RA**), in accordance with sections 5(1)(e) and 9(2)(c)(ix) of the Electronic Communications Act 2011 (**ECA**), issues the first round of public consultation regarding the discontinuation of the Bermuda Telephone Company Limited (**Digicel/BTC**) copper network.
2. This Consultation Document is structured as follows:
 - a. section 2 sets out the consultation procedure;
 - b. section 3 sets out the legislative context and framework;
 - c. section 4 sets out the consultation background;
 - d. section 5 sets out the Digicel/BTC's copper network discontinuation/decommissioning plan;
 - e. section 6 sets out the RA's initial conclusions;
 - f. section 7 sets out the consultation questions;
 - g. Appendix A sets forth the summary timeline of engagement between Digicel/BTC and the RA on Copper Retirement
 - h. Appendix B sets out Digicel/BTC's proposed migration processes;
 - i. Appendix C sets forth Digicel/BTC's copper to fibre risk mitigation strategies;
 - j. Appendix D provides a list of frequently asked questions provided by Digicel/BTC;
 - k. Appendix E provides sample customer communications from Digicel/BTC;
 - l. Appendix F sets out Digicel/BTC's proposed process for the decommissioning of the copper network once customer migration has been completed;
 - m. Annex A provides the wording of the proposed initial General Determination; and
 - n. Annex B sets out the Schedule for the proposed initial General Determination including the proposed Procedures and Standards for the Discontinuation of the Bermuda Telephone Company Limited Copper Network.

2. CONSULTATION PROCEDURE

3. This consultation is being undertaken in accordance with sections 5(1)(e) and 9(2)(c)(ix) of the ECA, and sections 62 and 69 to 73 of the Regulatory Authority Act 2011 (RAA). The procedure and accompanying timelines (as set out in section 70 of the RAA), under which this consultation is taking place have been set out below. The RA plans to complete this consultation process and issue a final report, decision and order by no later than 1 March 2027.
4. Written responses should be submitted before 11:59 P.M. (AST) on 9 November 2026.
5. The RA invites comments from members of the public, electronic communications sectoral participants and sectoral providers, and other interested parties.
6. All submissions will require a 'declaration of interest'. Any submission must include the name, address and occupation of the commenting party. It must be signed by the individual, in the case of a personal submission, or by an authorised representative of any business. Personal submissions must declare any relevant link to a licenced or government body, whether commercial or personal (ie family, etc). Where a business is not a licenced carrier, any business' submission must declare commercial relationships to any licenced operator. Failure to declare an interest that is subsequently identified will lead to the rejection of the submission.
7. Responses to this Consultation Document should be filed electronically in PDF format. Parties wishing to file comments follow this link: <https://www.ra.bm/consultations/consultations-directory> and click on the relevant consultation title.
8. All comments should be clearly marked "Comments on the Discontinuation of the Bermuda Telephone Company Limited Copper Network" and should otherwise comply with Rules 18 and 30 of the RA's Interim Administrative Rules, which are posted on the RA's website.
9. The RA intends to make responses to this Consultation Document available on its website. If a commenting party's response contains any information that is confidential in nature, a clearly marked "Non-Confidential Version", redacted to delete the confidential information, should be provided together with a complete version that is clearly marked as the "Confidential Version." Redactions should be strictly limited to "confidential information," meaning a trade secret, information whose commercial value would be diminished or destroyed by public disclosure, information whose disclosure would have an adverse effect on the commercial interests of the commenting party, or information that is legally subject to confidential treatment. The "Confidential Version" should highlight the information that has been redacted. Any person claiming confidentiality in respect of the information submitted must provide a full justification for the claim. Requests for confidentiality will be treated in the manner provided for in Rule 30 of the RA's Interim Administrative Rules.
10. In accordance with section 73 of the RAA, any interested person may make an *ex parte* communication during this consultation process, subject to the requirements set forth in this paragraph. An *ex parte* communication is defined as any communication to a Commissioner or member of staff of the Authority regarding the matter being consulted on in this Consultation Document, other than a written submission made pursuant to section 73(2) of the RAA. Within two (2) business days after making an *ex parte* communication, the person who made the *ex parte* communication must submit the following to the RA:

- (i) a written description of the issues discussed, and positions espoused; and
- (ii) a copy of any written materials provided.

11. The principal point of contact at the RA for this Consultation is Craig Davis, referencing “Comments on the Discontinuation of the Bermuda Telephone Company Limited Copper Network” at consultation@ra.bm or by mail at:

Craig Davis
Senior Manager Electronic Communications
Regulatory Authority
1st Floor, Craig Appin House
8 Wesley Street
Hamilton, Bermuda

12. In this Consultation Document, except insofar as the context otherwise requires, words or expressions must have the meaning assigned to them by the ECA, the RAA and the Interpretation Act 1951.
13. This Consultation Document is not a binding legal document and does not contain legal, commercial, financial, technical or other advice. The RA is not bound by this Consultation Document, nor does it necessarily set out the RA's final or definitive position on particular matters. To the extent that there might be any inconsistency between the contents of this Consultation Document and the due exercise by the RA of its functions and powers, and the carrying out of its duties and the achievement of relevant objectives under law, such contents are without prejudice to the legal position of the RA.

3. LEGISLATIVE CONTEXT

14. The ECA is the applicable sectoral legislation governing the electronic communications sector. It received royal assent on 18 December 2011 and commenced on 28 January 2013.

15. Section 5(1)(e) of the ECA states as follows:

“(1) The purpose of this Act shall be to –

(e) promote the orderly development of Bermuda’s electronic communications sector;”

16. Section 9 (2) (c) (ix) of the ECA states as follows:

“(2) The functions of the Authority shall include –

(c) the making of administrative determinations to provide for the control and conduct of public electronic communications, including –

(ix) procedures and standards for the discontinuation of a public electronic communications service;”

4. BACKGROUND

17. Digicel/BTC operates a legacy copper telecommunications network that has historically been used to provide fixed voice and broadband services in Bermuda.
18. Digicel/BTC commenced the deployment of a fibre-based network in early 2017 with the majority of the network completed by 2018/19. This long-term digital infrastructure investment was made for a combination of technical, commercial and strategic reasons including:
 - (a) To replace aging copper infrastructure;
 - (b) To deliver higher internet speeds and better service quality;
 - (c) To launch new television and broadband products;
 - (d) To create a fully fibre-based network architecture; and
 - (e) To compete more effectively in Bermuda's electronic communications sector.
19. Digicel/BTC have advised that this fibre-based network represents a scalable, reliable and resilient technology that meets modern customer demands for both voice and data services. The fibre-based network can support high-bandwidth applications and can scale with increasing demand, in line with regulatory goals for broadband expansion and improvement. Digicel/BTC's fibre-based network is intended to support all customers offering a viable and resilient option for accessing electronic communications services.
20. Digicel/BTC has advised the RA that the continued operation of the copper network presents increasing operational challenges, including:
 - (a) deterioration of aging infrastructure;
 - (b) increasing maintenance requirements (and associated outages to customers);
 - (c) equipment obsolescence;
 - (d) limited availability of replacement parts and vendor support; and
 - (e) reduced operational efficiency resulting from maintaining both copper and fibre networks particularly as customers gradually (voluntarily) migrated off the copper network.
21. Since the deployment of the Digicel/BTC fibre network in 2017/18, a substantial number of customers have voluntarily migrated from copper-based services to fibre-based services. As of July 2026, over 96% of residential and 62% of commercial customers have been successfully migrated onto the fibre network. 2% of wholesale copper-based connections remain to be migrated onto the fibre network as well.
22. Digicel/BTC have now been experiencing reluctance (to migrate) from the remaining customers on the legacy copper network with the most common message being "we will migrate when we have to and not before".

23. In the Regulatory Authority's 2020 Market Review General Determination (**2020 MRGD**), the RA determined that any proposal by a sectoral provider with Significant Market Power to decommission a legacy network would be subject to standards, procedures and a timetable approved by the RA pursuant to sections 5(1)(e) and 9(2)(c)(ix) of the ECA. The RA further indicated that a public consultation would be undertaken before any such migration programme was approved.
24. The decision made in the 2020 MRGD was restated in the Regulatory Authority (Market Review of the Electronic Communications Sector) General Determination 2025. The specific *ex ante* remedy imposed on Digicel/BTC was: *"Digicel is prohibited from discontinuing their existing copper facilities and is required to maintain this network until the Authority approves the standards, procedure and timetable for decommissioning copper through a public consultation"*.
25. The RA has engaged with Digicel/BTC on a number of occasions since 2021 regarding the potential retirement of its copper network. This engagement included discussions concerning customer migration, stakeholder engagement, consumer protection measures, implementation timelines, and the procedures and standards required under sections 5(1)(e) and 9(2)(c)(ix) of the Electronic Communications Act 2011. A summary timeline of the engagement between the RA and Digicel/BTC is provided in Appendix A. It should be noted that while Digicel/BTC have provided information at times between 2020 and 2026, it is only in 2026 that sufficient details have been provided to trigger this consultation process.
26. Digicel/BTC submitted its final copper discontinuation plan on 23 July 2026. The RA has reviewed the submitted plan and believes that sufficient information has been provided to commence this public consultation on the proposed procedures and standards for the discontinuation of the copper network.
27. The purpose of this consultation is to assist the RA in determining the appropriate procedures, standards, consumer protection measures and implementation timetable that should apply to the discontinuation of Digicel/BTC's copper-based services.

5. PROPOSED COPPER RETIREMENT AND MIGRATION PLANS

28. Services Impacted

Services affected by Copper Retirement	Replacement Service
Residential Voice Access Line Single pair copper-based telephone or facsimile line	Fibre Phone - Gigabit Passive Optical Network (GPON) fibre service to the premise. Includes Digicel provided Optical Network Terminal (ONT) at the premises. Provides a standard copper single pair connection from the ONT.
Residential Internet Broadband Single pair DSL Broadband	Fibre Phone – GPON fibre service to the premise. Includes Digicel provided ONT at the premises. Provides a standard copper single pair connection from the ONT.
Business Voice Line Single pair copper-based telephone or facsimile line	Fibre Phone – GPON fibre service to the premise. Includes Digicel provided ONT at the premise. Provides a standard copper single pair connection from the ONT.
Business Voice (up to 8 lines) Multiple single pair copper-based telephone or facsimile	Fibre Phone – GPON fibre service to the premise. Includes Digicel provided multi-port ONT at the premises. Provides up to 8 standard copper single pair connections from the ONT.
Business Voice T1 PRI service Multiple (up to 24) telephone or facsimile lines delivered on a copper (two pair) T1. Typically used for PABXs.	Option A: Convert to native SIP via Digicel/BTC Metro Ethernet or GPON fibre service with ONT. Ethernet connection to customer equipment (requires customer equipment to be able to handle ethernet). Option B: Convert to SIP/Analog gateway with PRI output (T1 copper) to customer equipment. Same copper T1 connection to the customer equipment.

29. Pricing and Options

- (a) Digicel/BTC have confirmed that customers' existing billing arrangements will not change because of the migration process;
- (b) Digicel/BTC will bear the costs associated with migration, installation and decommissioning activities;
- (c) Digicel/BTC acknowledges that some customers may not choose to migrate to the Digicel/BTC fibre network. Customers may elect to move to another provider and utilize the Local Number Portability facility if they choose to keep their telephone number.
- (d) Voice customers will retain the option of choosing their international voice provider;

- (e) Fax services will work on the Digicel/BTC fibre network;
- (f) Current Digicel + Fibre Phone offerings are available on Digicel's website; and
- (g) Digicel/BTC have advised that suitable replacement fibre-based services are available to all remaining customers currently served by the legacy copper network.

30. Migration Processes;

Digicel/BTC's proposed migration processes are attached as Appendix B.

Digicel/BTC's migration process calls for a systematic project on a per-parish basis starting in the East End of the island (St. Georges). Digicel/BTC's process includes the following milestones on a per-parish basis:

- (a) Letter #1 mailed: XXX-day notice.
- (b) Email campaign sent out to billing contacts.
- (c) Outbound call campaign with formal shut down date.
- (d) Migration deadline for priority scheduling.
- (e) Letter #2 mailed: Final written XXX day notice.
- (f) Ongoing digital advertisements, SMS reminders (where the customer has agreed for SMS contact) and final telephone call reminders.
- (g) Migration of customers.
- (h) Copper network switch off in **AREA** following completion of the approved migration and customer notification process.

31. Risk Mitigation

Digicel/BTC have provided an analysis of risks and mitigations for the remaining copper migration processes. This analysis is attached as Appendix C.

32. Frequently Asked Questions

A set of frequently asked questions and answers have been provided by Digicel/BTC and attached as Appendix D.

33. Market Communications;

- (a) Weekly Radio Interviews

Digicel/BTC will be participating in a series of ongoing live interviews on local radio stations, spotlighting fibre benefits and network updates plus special offers for customers.

(b) Migration letters

Targeted communications explaining the options and processes will be sent directly to the customer of record. Sample letters are attached as Appendix D.

(c) Fibre and Connectivity Digital Marketing

Digicel/BTC will be providing “always-on” digital content promoting the benefits of the new fibre network including speed and reliability.

(d) Seniors

- (i) Digicel/BTC will continue to provide educational materials designed to support seniors including awareness of what options are available to them from a resiliency perspective.
- (ii) These materials will be promoted in a number of ways including through a partnership with the Salvation Army for “All about Fibre” Seniors Lunch and Learns.
- (iii) Digicel/BTC intends to continue engaging with other entities such as Age Concern to ensure that the information is disseminated as widely as possible.

34. Support Measures

- (a) In the event customers experience migration related issues, Digicel/BTC has established a dedicated customer service line **(500-1040)** for assistance.
- (b) Once received, calls will be redirected to Digicel/BTC’s local dispatch team and technical teams who will provide the assistance needed.
- (c) Any additional questions may be directed to Digicel/BTC Customer Care at the following:
 - Telephone: 500-5000
 - Email: info.digicelbermuda@digicelgroup.com
 - Website: <https://www.digicelgroup.com/bm/en>

35. Power Backup

- (a) Digicel/BTC have recognized that there are concerns from certain segments of the residential community about what happens in the event of a power failure.
- (b) Digicel/BTC have secured battery backup devices that interface directly with the ONT at the customer premises. These battery backup devices will provide power for several hours (depending on usage) in the event of a mains electrical failure. This will allow the customer to make telephone calls as long as the fibre network is intact and the battery backup device is still providing power.

- (c) Delivery and installation of the battery backup devices can occur simultaneously with the copper-fibre migration at the customer premises.
- (d) Digicel/BTC have confirmed that any customer who is hesitant to migrate due to power failure concerns can request a battery backup device at no cost.
- (e) Other customers may request these battery backup devices through the Digicel/BTC website at <https://www.digicelgroup.com/bm/en/fibre-devices>.

36. Proposed Timetable

- (a) Digicel/BTC have indicated that they are ready to commence the discontinuation of remaining customers in a phased approach.
- (b) Digicel/BTC's plan identifies St. Georges as the parish in which the discontinuation process will commence. Migration can also occur at the same time if the customer chooses to remain with Digicel/BTC.
- (c) Digicel/BTC have confirmed that should their discontinuation plans be approved by the RA, their intention is to commence mandatory discontinuation and migration activities two (2) months after the RA's consultation exercise has concluded.
- (d) Digicel/BTC have confirmed that they will provide regular reports to the RA regarding the percentage of remaining customers on the network.
- (e) Digicel/BTC will continue to monitor the fibre network stability and performance after migration to ensure compliance with relevant customer service quality requirements.

37. Final Network Switch-off

- (a) At the conclusion of customer discontinuation and migration, Digicel/BTC will commence on a Copper Network Decommissioning Process. This process is attached as Appendix F.
- (b) This process will include removal of all overhead copper network infrastructure on the electrical poles.
- (c) It is anticipated that this process will take approximately 13 months to complete from the conclusion of the RA's consultation process.
- (d) Decommissioning work in areas that have already completed discontinuation and migration will be carried out in parallel to customer migrations in other areas.

6. RA'S INITIAL CONCLUSIONS

38. This section sets out the RA's initial conclusions regarding the procedures and standards for the discontinuation of the Digicel/BTC copper network.
39. The RA initially concludes that the proposed discontinuation and migration framework provided by Digicel/BTC supports the discontinuation of a public electronic communications service. The RA believes that the proposed procedures and standards maintain appropriate consumer protection and service continuity safeguards, subject to any amendments arising from this consultation. Given this, the RA seeks public comment on the proposed plan to discontinue the Digicel/BTC copper network.
40. The RA's initial proposal on the standards and procedures required for the discontinuation of Digicel/BTC's copper network are contained in Annex B.
41. Stakeholders are encouraged to review the Consultation Questions in section 7 below and provide their feedback to the RA.
42. This consultation document does not yet contain a fully developed set of binding procedures and standards. However, this is not necessarily inappropriate given that the consultation represents the first stage in the process contemplated by section 9(2)(c)(ix) of the ECA. The purpose of the consultation is to obtain stakeholder feedback on the proposed standards, procedures and timetable to discontinue the copper network before the RA finalizes them. The approved standards and procedures will ultimately be incorporated into a General Determination.
43. This consultation provides stakeholders with sufficient information to understand the proposed retirement programme. This consultation also allows stakeholders to comment on key issues including customer communications, migration processes, vulnerable customer protections, service continuity, resiliency, reporting obligations and implementation timelines.
44. Following consideration of stakeholder submissions, the RA may further develop these areas in the final General Determination and Schedule. These developments may create a comprehensive and enforceable regulatory framework governing the discontinuation of the Digicel/BTC copper network.

7. CONSULTATION QUESTIONS

Q1	Noting the draft standards and procedures contained in Annex B, are there any additional standards or procedures that the RA should require Digicel/BTC to implement before discontinuing copper-based services? If yes, please describe the measures that should be considered.
Q2	Are you satisfied that customers will receive sufficient notice and information before any copper-based services are withdrawn? If not, what additional measures should be required?
Q3	Are there any customer groups, including seniors or vulnerable customers, that require additional support or protections during the discontinuation and migration process? Should additional conditions be imposed on Digicel/BTC such as whether: • additional vulnerable customer categories should be recognized; • enhanced migration assistance should be required; • a vulnerable customer register should be established; or • additional notification requirements should apply to certain customer groups. If yes, please describe the measures that should be considered.
Q4	Are additional measures required to maintain access to communications services during extended power outages following hurricanes or other emergency events? If yes, please describe the measures that should be considered.
Q5	Do you agree with the proposed timetable for migration, discontinuation and retirement of the copper network? If not, what changes would you recommend?
Q6	Has Digicel/BTC provided enough information about the discontinuation migration process, including installation requirements and service changes? If not, what additional information would you like to receive?
Q7	Customer Notification Standards: How much notice should customers receive before their copper-based service is withdrawn? What would an appropriate minimum notice period be?

	Should different notice requirements apply to residential and business customers? What should be the minimum number of contact attempts required (with no response) before Digicel/BTC is permitted to withdraw service? What public notices should accompany individual customer notifications? Please provide reasons for your response.
Q8	What conditions should be imposed on Digicel/BTC before permission is granted for Final Service Discontinuation? Examples could include: • whether all affected customers must be contacted successfully; • what constitutes reasonable migration efforts by Digicel/BTC; • how customers who decline migration should be treated; and • whether additional safeguards should be implemented before service discontinuation occurs. Should the RA require Digicel/BTC to certify compliance with all approved notification, migration and consumer protection requirements before copper services may be discontinued in a geographic area? Please provide reasons for your response.
Q9	Do you have any additional comments or recommendations regarding the proposed retirement of Digicel/BTC's copper network?

8. INITIAL DECISION AND ORDER

45. The Regulatory Authority of Bermuda (RA), pursuant to sections 12, 13 and 62 of the Regulatory Authority Act 2011 and sections 5(1)(e) and 9(2)(c)(ix) of the Electronic Communications Act 2011, hereby:
- (a) Adopts the General Determination attached hereto, permitting Digicel/BTC to commence the discontinuation of its copper-based networks no earlier than 2 months from the date of this General Determination subject to the conditions set out in the schedule to this General Determination;
 - (b) Directs the Chief Executive of the RA to forward the General Determination to the Cabinet Secretary; and
 - (c) Authorises the General Determination to take effect on the date of its publication in the Official Gazette.

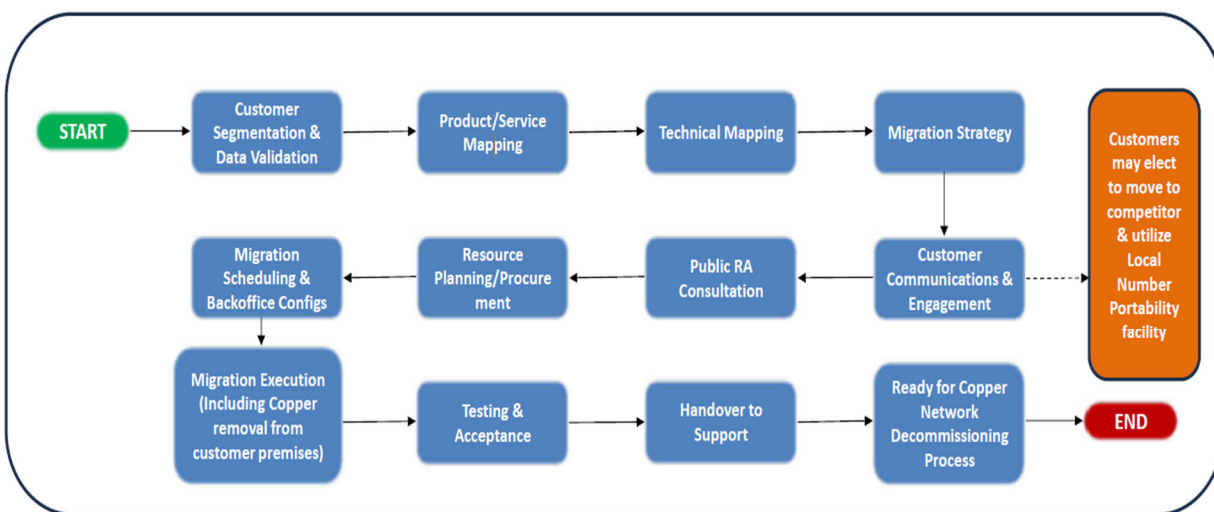
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APPENDIX A: SUMMARY TIMELINE OF ENGAGEMENT BETWEEN DIGICEL/BTC AND THE RA ON COPPER RETIREMENT

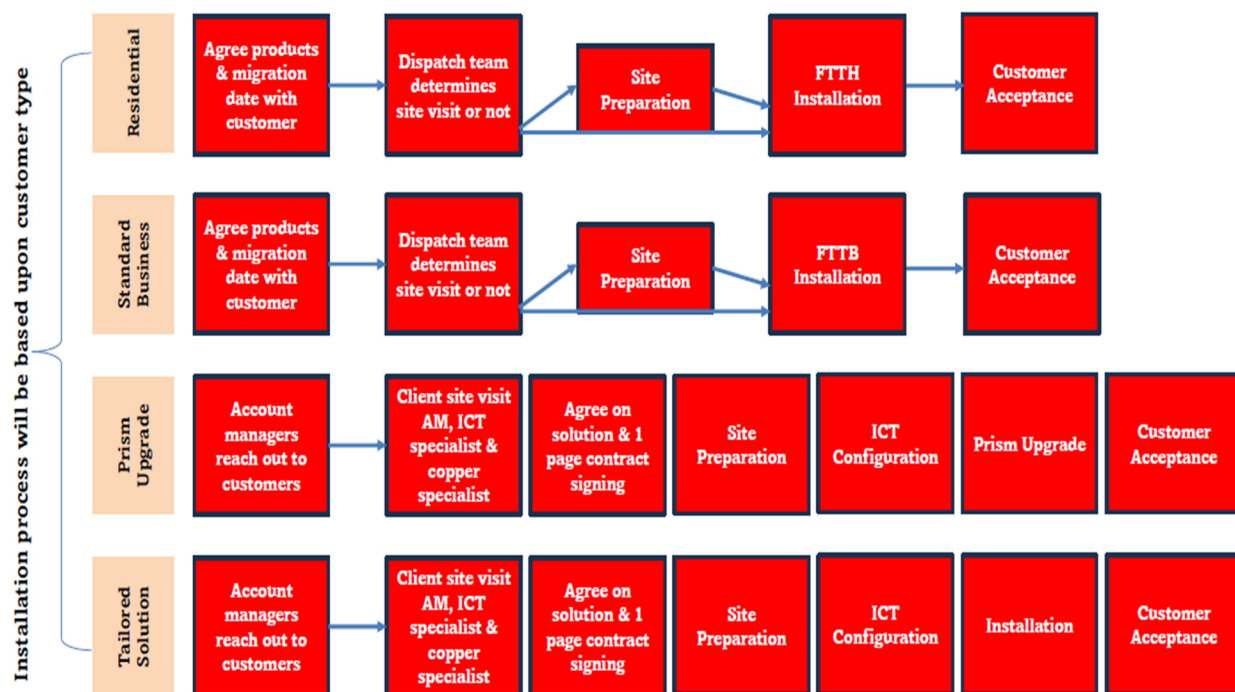
Date	Event
2020	In the 2020 MRGD, the RA determined that any retirement of a legacy copper network by an operator with Significant Market Power would be subject to RA review, approved procedures and standards, and public consultation.
April 2021	Digicel/BTC advised the RA of operational and commercial challenges associated with maintaining the legacy copper network, including ageing infrastructure, equipment obsolescence, increased outages and declining utilisation as customers migrated to fibre services.
April 2021	Digicel/BTC announced a cease-sale of new copper-based services and provided advance notice to customers and industry participants. New copper services ceased on 1 July 2021. Existing customers continued to be served on the copper network.
2021–2022	Digicel/BTC continued voluntary migration of customers from copper-based services to fibre-based services.
2 March 2023	Digicel/BTC informed the RA of its desire to move beyond voluntary migration and pursue retirement of the copper network.
9 March 2023	The RA reminded Digicel/BTC that retirement of the copper network would require procedures and standards to be reviewed by the RA and subjected to public consultation. The RA requested additional information regarding customer migration, stakeholder engagement, consumer protections, migration timelines and customer communications. The RA specifically requested confirmation that Digicel/BTC had engaged in meaningful dialog with key stakeholders such as Age Concern, Fire & Security firms, Credit Card merchant organizations and any other stakeholders.
28 February 2024	Digicel/BTC submitted updated information to the RA, including its copper sunset programme, migration statistics, stakeholder engagement activities and customer feedback regarding voluntary migration.
23 December 2024	The RA requested an updated status report regarding migration progress and responses to outstanding information requests.
14 February 2025	Digicel/BTC provided updated customer migration statistics, stakeholder engagement information, customer mitigation measures, and service continuity information to the RA.
February – July 2026	Digicel/BTC and the RA engaged in a number of exchanges serving to refine the information needed to trigger the required consultation process.
23 July 2026	Digicel/BTC submitted its final copper discontinuation plan to the RA.
24 September 2026	The RA commenced public consultation on the proposed Procedures and Standards for the Discontinuation of the Bermuda Telephone Company Limited Copper Network.

APPENDIX B: DISCONTINUATION AND MIGRATION PROCESSES

Key Milestones



Segmented Migration Process – High Level



APPENDIX C: COPPER TO FIBRE RISK MITIGATION

ID	Risk Category	Description	Probability	Impact	Risk Owner	Risk Mitigation
R1	Technical	Unexpected technical issues during cutover may cause prolonged downtime for critical corporate services.	Medium	High	Network Engineering	Conduct pre-cutover testing, maintain copper-fiber overlap, establish rollback plans, schedule migrations during maintenance windows for high-risk sites.
R2	Technical	Insufficient fiber network capacity or OLT ports delay migrations in some areas.	Low-Medium	High	Network Planning	Perform proactive capacity planning, pre-provision ports.
R3	Technical	Compatibility issues between customer legacy equipment and fiber-based services.	Medium	Medium	Commercial Sales	Conduct technology audits, procure ATA devices where applicable, recommend equipment upgrades when necessary.
R4	Operational	Delays in fiber installation due to building access constraints, permitting, or landlord/proprietor issues.	Medium	High	Field Operations/Service Delivery	Begin access negotiations early, maintain a dedicated access coordination team, escalate through account managers.
R5	Customer & Commercial	Corporate customers resist migration due to cost changes, contract terms, or internal IT policies.	Medium	High	Account Management	Offer customized migration packages (where possible), clearly communicate copper EOL risks, highlight reliability and performance gains.
R6	Customer & Commercial	Migration disrupts customer operations, leading to dissatisfaction or churn.	Low-Medium	High	Customer Care/Commercial Sales	Provide dedicated SPOCs for major accounts, schedule migrations in customer-preferred windows (where feasible), provide post-cutover support.
R7	Regulatory	Challenges in meeting mandated quality-of-service (QoS) standards during the transition period.	Low	High	Regulatory Affairs	Maintain service continuity through proper planning, monitor KPIs, proactively report progress to regulators.
R8	Project Delivery	Program delays push migration beyond copper EOL timelines, increasing risk of service failures.	Medium	High	Program/Project Manager & Sponsor	Implement strict timeline governance, maintain milestone reviews, allocate additional resources where needed.
R9	Infrastructure	Legacy copper faults spike before migration is complete, increasing customer impact and operational costs.	Low-Medium	Medium-High	Network Operations	Prioritize high-fault copper areas for early migration, monitor copper fault trends, deploy rapid-response teams (if possible).
R10	Third-Party Dependencies	Delays or failures by contractors, vendors, or IT integrators impact delivery timelines.	Medium	Medium	Vendor Management	Strengthen vendor SLAs, enforce performance KPIs, establish contingency vendors, maintain engagement with B2B customers on customer requirements.
R11	Data & Systems	BSS/OSS records reconciliation	Low-Medium	Medium	IT Systems	Implement rigid change management, automate updates where possible, run post-migration data validation.
R12	Operational	Damages to customer premises during migration or copper decommission.	Medium	Medium	Field Operations/Service Delivery	Periodic process reviews with SD teams; Digicel will continue with existing (and current) policy to repair damages to customer premises.

APPENDIX D: FREQUENTLY ASKED QUESTIONS (FAQS)

1. What is happening?

Digicel/BTC is upgrading its telecommunications network and will be migrating customers from its legacy copper network to its modern fibre (FTTx) network. As part of this upgrade, copper-based services will be discontinued in phases.

2. Why is Digicel/BTC discontinuing its copper network?

The copper network has reached the end of its operational life and is becoming increasingly difficult to maintain. Fibre technology provides customers with a more reliable, resilient and higher-performing network capable of supporting today's communication needs and future technological developments. Digicel/BTC remains committed to providing its customers with reliable service.

The Electronic Communications Act 2011 permits sectoral providers to discontinue public electronic communications services if they present proper procedures and standards for discontinuation of the said services.

3. What is fibre (FTTx)?

FTTx (Fibre to the Premises) is a fibre-optic network that delivers telecommunications services using fibre cables rather than traditional copper cables. Fibre provides improved reliability, greater network capacity and supports faster broadband services.

4. Will I have to move to fibre?

Customers receiving services over the copper network will eventually need to migrate before copper services are discontinued.

Customers may choose to migrate to Digicel/BTC's fibre services or, where available, obtain services from another licensed provider. In most cases, you may opt to keep your existing number via the local number portability (LNP) option offered by Digicel/BTC and most providers.

5. When will my service be migrated?

Digicel/BTC will notify customers well in advance of any migration affecting their service.

Mandatory migrations will not begin until at least two months after the conclusion of the Regulatory Authority's public consultation process and any approvals required by the Regulatory Authority have been obtained.

6. How will I know when it is my turn?

Digicel/BTC will contact affected customers using one or more of the following methods:

- Letter
- Email
- SMS

- Telephone call
- Website notices
- Public advertisements where appropriate

Customers will receive sufficient notice before any migration takes place.

7. Will there be any interruption to my service?

Digicel/BTC will work to minimise service disruption. Most installations can be completed with little interruption. Where temporary service interruption is necessary, customers will be advised in advance.

8. Will I need new equipment?

Depending on your new service, you may receive equipment such as:

- An optical network terminal (ONT)
- A modem or router
- A VoIP adapter
- Updated telephone equipment

Our team will advise you if new equipment is required.

9. Will Digicel/BTC install the fibre service?

Yes. Digicel/BTC will arrange for qualified technicians to install the fibre connection and any necessary equipment.

10. Will I have to pay for the migration?

No. Digicel/BTC will bear the network infrastructure costs associated with migration, installation and decommissioning activities.

11. Will my monthly bill increase because of the migration?

The migration itself will not result in changes to your current billing arrangements. If you choose to change your service package or add additional services, any applicable charges will be discussed with you before those changes are made.

12. Will Digicel/BTC remove the old copper equipment?

Yes. Where applicable, Digicel/BTC will remove or decommission network equipment associated with the discontinued copper service as part of the migration process.

13. What if I do not want to migrate?

Customers are encouraged to discuss their options with Digicel/BTC. Customers may also choose to obtain services from another licensed provider, where available. Customers who do not migrate before the discontinuation of copper services will eventually lose access to services provided over the copper network.

14. Will my telephone number change?

No. Customers who migrate to Digicel/BTC's fibre service should generally be able to retain their existing telephone number. In most instances, customers opting to change service providers may be able to keep their existing number by employing the local number portability (LNP) option offered by most service providers.

15. Will my emergency calling services continue to work?

Yes. Emergency calling services will continue to be available following migration. Customers should note that fibre services require electrical power to operate inside the premises. During a power outage, services may not function unless suitable backup power is available.

16. What happens if there is a power outage?

Unlike traditional copper services, fibre equipment installed within your premises requires electricity. If electrical power is lost, voice services may not operate unless backup power is available.

If uninterrupted telephone service is important for health, safety, or business reasons, please discuss available backup power or alternative options with Digicel/BTC or another sectoral provider of your choice.

17. Will Digicel/BTC provide battery backup?

Upon request, remaining migrating customers will be provided with battery backup devices in accordance with Digicel/BTC's migration programme.

18. Will work need to be carried out at my property?

In many cases, yes. A Digicel/BTC technician may need access to your property to install the fibre connection and related equipment. Digicel will arrange an appointment at a mutually convenient time.

19. How long will installation take?

Installation times vary depending on the location and complexity of the installation. Digicel/BTC's technician will provide an estimated completion time when your appointment is scheduled.

20. **Who can I contact if I have questions?**

- (a) In the event customers experience migration related issues, Digicel/BTC has established a dedicated customer service line **(500-1040)** for assistance.
- (b) Once received, calls will be redirected to Digicel/BTC's local dispatch team and technical teams who will provide the assistance needed.
- (c) Any additional questions may be directed to Digicel/BTC Customer Care at the following:
 - Telephone: 500-5000
 - Email: info.digicelbermuda@digicelgroup.com
 - Website: <https://www.digicelgroup.com/bm/en>

21. **Where can I find more information?**

Updates regarding the migration programme will be available on Digicel/BTC's website and through customer communications issued during the migration process.

APPENDIX E: DIGICEL/BTC'S SAMPLE CUSTOMER COMMUNICATIONS

Letter 1 – Early Notice - XXX Days

Letter 1 Summary – Early Notice (XXX-day warning)

Goal: Inform customers of switch off date

Subject: Important Notice: Copper Services Ending Soon – Upgrade to Fibre Now

We're upgrading Bermuda to a faster, more reliable fibre network. As part of this transition, Digicel will permanently retire the aging copper network in **AREA** on **DATE**.

If you're still using copper, your services will stop working after this date. **Call 500-5000 by DATE**, to upgrade and avoid disruption.

We're here to help make the upgrade easy.

Letter 2 – Early Notice - XXX Days

Letter 2 Summary – Final Notice (XXX day warning)

Goal: Final push to migrate or face disconnection

Subject: FINAL NOTICE: Your Services Will Be Disconnected on DATE

This is your final reminder: Digicel's copper network in **AREA** will be permanently shut down on **DATE**.

If you are still connected to copper, your services will stop working on that date. To avoid disconnection, call 500-5000 today to switch to fibre.

We want to keep you connected—don't wait. Let's upgrade together.

Sample Letter 1

Customer Advisory: Copper Services Ending Soon in AREA

Dear Valued Digicel Customer,

We're excited to share a major step forward in delivering a faster, more reliable future for Bermuda's connectivity. As part of our island-wide copper-to-fiber migration—launched in 2022, we're proud to report that over 95% of our customers have already made a move to our world-class fibre network. This transition is part of a global industry shift and our ongoing commitment to Bermuda as we replace outdated copper technology with future-proof, reliable fiber.

Important Notice for AREA Customers

As we enter the final stage of our network upgrade, please be advised that the copper network in **AREA** will be permanently switched off on **DATE**. After this date, any services still connected to the copper network—including home phone, internet, and related devices will stop working.

What You Need to Do

If you haven't made the switch to fibre yet, don't worry—we're here to help! Please call Digicel Bermuda at 500-5000 to schedule your upgrade and avoid copper disconnection. By making the switch, you'll enjoy faster speeds, improved reliability, and access to services designed for the future.

Need Help?

If you have any questions, we're here to help.

- Call: 500-5000
- Email: info.bermuda@digicelgroup.com
- Visit: 46 Cedar Avenue, Hamilton, HM11 Bermuda

Thank you for being a valued part of the Digicel family. We look forward to connecting you to the future with fibre!

Warm regards,

The Digicel Bermuda Team

Sample Letter 2

FINAL NOTICE: Copper Network Disconnection in AREA – Month xx, 20xx

Dear Customer,

This is a final reminder that Digicel will permanently switch off the copper network in **AREA** on **DATE**.

If you are still using copper-based services, your home phone, internet, or any connected devices will stop working after this date. This is part of Digicel's island-wide fiber upgrade, which provides you with faster, more reliable service.

We don't want you to lose connection. To avoid any interruption, you must contact Digicel Bermuda urgently to migrate your services to our new fibre network.

What You Need to Do

Please call us at 500-5000 before **DATE**, to schedule your fibre upgrade and ensure you stay connected. This is the final phase of an industry-wide shift away from outdated and unreliable copper technology to innovative fibre solutions that are built for the future.

If you have questions or need assistance, we're here to help:

Call 500-5000

Email info.bermuda@digicelgroup.com

Visit: 46 Cedar Avenue, Hamilton, HM11 Bermuda

Thank you for being a valued part of the Digicel family. We look forward to connecting you to the future with fibre!

Sincerely,

The Digicel Bermuda Team

Sample Other

Outbound Voicemail

Audience: All copper customers in (**AREA**)

Message:

“Hi, this is Digicel Bermuda. We’re calling to remind you that our copper network in your area will be switched off on **DATE**. To avoid losing your home phone and internet, we’d love to help you move to fibre. Let’s schedule your upgrade today—call us at 500-5000.”

SMS Reminders

- Reminder: Digicel copper network ends on **DATE**. Call 500-5000 by xxx to stay connected.
- Final notice: Upgrade to fibre today to avoid losing your copper service on **DATE**. Call 500-5000.
- Digicel copper services will be disconnected on **DATE**. Call 500-5000 to upgrade to fibre & stay connected.

Other Suggestions

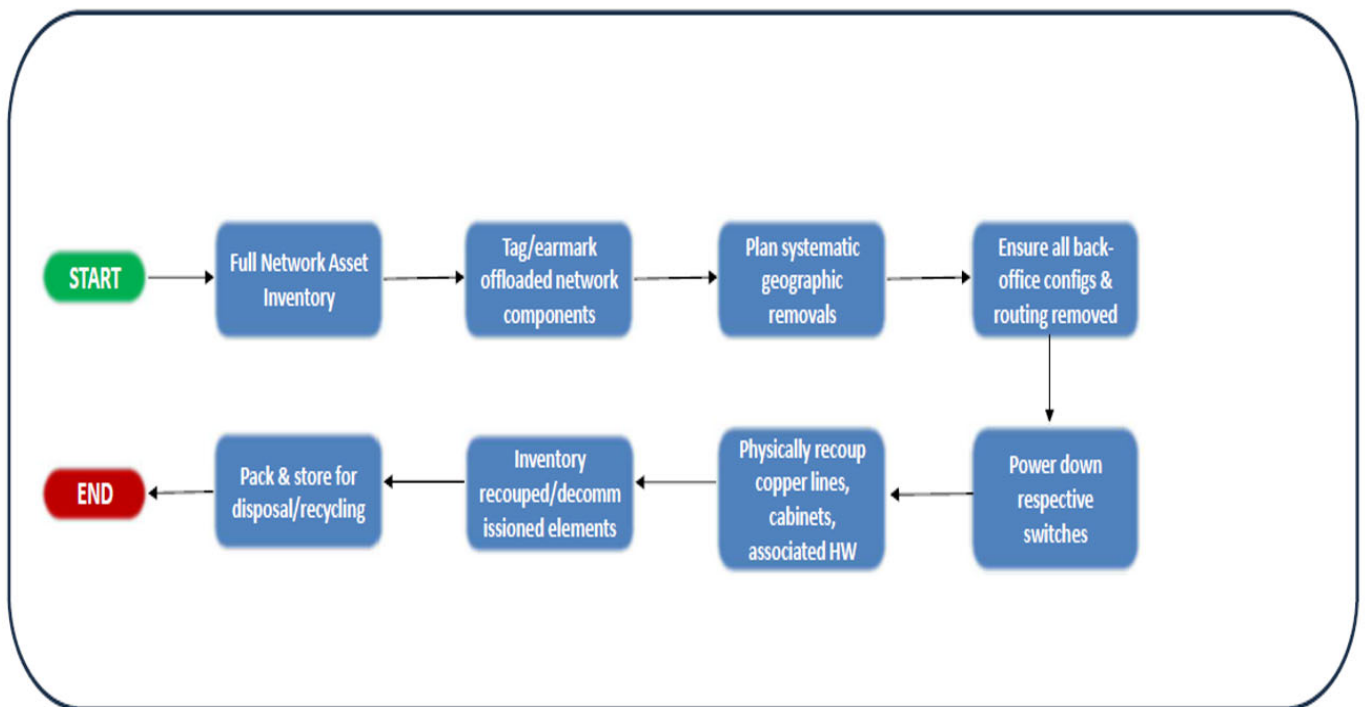
Web Banner link to updated switch off page

Retail Screens

Radio Live

APPENDIX F: COPPER NETWORK DECOMMISSIONING PROCESS

Key Milestones



ANNEX A: INITIAL PROPOSED GENERAL DETERMINATION

A. PROPOSED INITIAL GENERAL DETERMINATION

[DRAFT]

REGULATORY AUTHORITY (DISCONTINUATION OF THE BERMUDA TELEPHONE COMPANY LIMITED COPPER NETWORK) GENERAL DETERMINATION 2026

The Regulatory Authority, in the exercise of the power conferred by section 62 of the Regulatory Authority Act 2011, as read with sections 12 and 13 of that Act and sections 5(1)(e) and 9(2)(c)(ix) of the Electronic Communications Act 2011, makes the following General Determination:

Citation

1. This General Determination may be cited as the Regulatory Authority (Discontinuation of the Bermuda Telephone Company Limited Copper Network) General Determination 2026.

Interpretation

2. In this General Determination, unless the context otherwise requires, terms have the meaning given in the Regulatory Authority Act 2011 and the Electronic Communications Act 2011.

General Purpose

3. This General Determination establishes the Procedures and Standards for the Discontinuation of the Copper Network of the Bermuda Telephone Company Limited.

Determination

4. (1) This General Determination is made pursuant to section 9(2)(c)(ix) of the Electronic Communications Act 2011.

(2) The Authority determines that this General Determination and its Schedule are consistent with the purposes of the Electronic Communications Act 2011.

Effective Date of the General Determination

5. This General Determination becomes effective on the day it is published in the Official Gazette.

Terms and Conditions of the General Determination

6. (1) The Schedule to this General Determination has effect.

(2) The Schedule is also published on the Authority's website (<http://www.ra.bm/>) and is also available for inspection at the offices of the Authority (1st Floor, Craig Appin House, 8 Wesley Street, Hamilton HM 11) during ordinary business hours.

Signed this ____ of _____ 2026.

Chairman, Regulatory Authority

ANNEX B: INITIAL SCHEDULE FOR THE GENERAL DETERMINATION

Schedule to the Regulatory Authority (Discontinuation of the Bermuda Telecommunications Company Limited Copper Network) General Determination 2026

Part 1. General

1. This Schedule sets out the determinations of the Authority following the Discontinuation of the Bermuda Telephone Company Limited (Digicel/BTC) Copper Network public consultation concluded on ____.

Part 2: Procedures and Standards for the Discontinuation of the Bermuda Telephone Company Limited Copper Network

2. Application

- 2.1. This Part establishes the procedures and standards applicable to the discontinuation of copper-based electronic communications services provided by Digicel/BTC.
- 2.2. Digicel/BTC must not discontinue any copper-based electronic communications service except in accordance with this Schedule and any directions issued by the Authority.
- 2.3. Digicel/BTC must ensure that the discontinuation of copper-based services is undertaken in a manner that:
 - a. promotes the orderly development of Bermuda's electronic communications sector;
 - b. minimizes disruption to consumers and businesses;
 - c. maintains continuity of service wherever reasonably practicable;
 - d. facilitates migration to replacement electronic communications services; and
 - e. protects the interests of consumers, including vulnerable consumers.

3. Availability of Replacement Services

- 3.1. Digicel/BTC must not discontinue a copper-based service unless a technically feasible replacement service is available to the affected customer. A replacement service may consist of:
 - a. a fibre-based service provided by Digicel/BTC; or
 - b. a service provided by another licensed sectoral provider.

- 3.2. Nothing in this Schedule prevents a customer from electing to migrate to a service offered by another licensed sectoral provider.
- 3.3. Digicel/BTC must facilitate the retention of customer telephone numbers in accordance with applicable local number portability requirements.

4. Customer Notification Requirements

- 4.1. Digicel/BTC must provide affected customers with advance notice of the withdrawal of copper-based services.
- 4.2. The customer notification programme must include, at a minimum:
 - a. written notice;
 - b. direct electronic communications where appropriate contact information is available;
 - c. outbound customer contact attempts;
 - d. public awareness communications; and
 - e. such additional measures as the Authority may direct.
- 4.3. The initial written notification must be issued no less than [90] days before the planned withdrawal date.
- 4.4. A final written notification must be issued no less than [60] days before the planned withdrawal date.
- 4.5. Notices must contain, at a minimum:
 - a. the planned service withdrawal date;
 - b. information regarding available replacement services;
 - c. migration procedures;
 - d. customer support information; and
 - e. information regarding alternative service providers and number portability.
- 4.6. Digicel/BTC must maintain records demonstrating compliance with the notification requirements set out in this Part.

5. Customer Migration Procedures

- 5.1. Digicel/BTC must establish and maintain a migration programme for all affected customers.
- 5.2. The migration programme must include:

- a. customer engagement procedures;
 - b. installation and activation procedures;
 - c. fault management procedures;
 - d. customer assistance procedures; and
 - e. post-migration support procedures.
- 5.3. Digicel/BTC must take all reasonable steps to contact and migrate affected customers prior to withdrawal of copper-based services.
- 5.4. Digicel/BTC must bear the costs directly associated with migration, installation and decommissioning activities, except where otherwise agreed by the customer.

6. Vulnerable Customers

- 6.1. Digicel/BTC must establish procedures to identify and assist customers requiring additional support during the migration process.
- 6.2. Customers requiring additional support may include:
- a. senior citizens;
 - b. persons with disabilities;
 - c. persons dependent upon communications services for health or safety purposes; and
 - d. such other categories of customers as may be identified by the Authority.
- 6.3. Digicel/BTC must implement additional engagement and support measures for vulnerable customers. Such measures may include:
- a. enhanced customer communications;
 - b. additional migration assistance;
 - c. dedicated customer support arrangements;
 - d. home visits where reasonably necessary; and
 - e. provision of resiliency solutions approved by the Authority.

7. Emergency Communications and Service Resilience

- 7.1. Digicel/BTC must provide affected customers with clear information concerning the operational differences between copper-based and fibre-based services.

- 7.2. Digicel/BTC must specifically advise customers that fibre-based voice services require customer-premises electrical power.
- 7.3. Upon request, Digicel/BTC must make available appropriate backup power solutions for customers migrating to fibre-based voice services at no cost to the customer.
- 7.4. Digicel/BTC must maintain access to emergency calling services using replacement services in accordance with applicable legal and regulatory requirements.

8. Customer Equipment Compatibility

- 8.1. Digicel/BTC must provide customers with information regarding equipment that may be affected by migration from copper-based services.
- 8.2. Equipment that may require customer assessment includes, but is not limited to:
 - a. alarm systems;
 - b. fire monitoring systems;
 - c. medical monitoring systems;
 - d. elevator communication systems;
 - e. point-of-sale systems;
 - f. fax machines; and
 - g. private branch exchange systems.
- 8.3. Digicel/BTC must take reasonable steps to identify known compatibility issues prior to migration.

9. Customer Support and Escalation Processes

- 9.1. Digicel/BTC must maintain dedicated support arrangements for customers affected by the migration programme.
- 9.2. Such arrangements shall include:
 - a. telephone support;
 - b. electronic support channels;
 - c. complaint handling procedures; and
 - d. escalation procedures for unresolved migration-related matters.
- 9.3. Digicel/BTC must publish details of its migration support arrangements on its website and make such information available upon request.

10. Reporting Obligations

- 10.1. Digicel/BTC must provide periodic implementation reports to the Authority at intervals of not more than [30 days].
- 10.2. Reports must include:
 - a. the number of remaining copper customers by parish split into residential and commercial customers;
 - b. migration progress;
 - c. customer complaints relating to migration;
 - d. material service interruptions associated with migration activities;
 - e. vulnerable customer migration statistics;
 - f. the number of customers who have refused migration and will be subject to service termination after the copper network is withdrawn;
 - g. the number of customers who migrated to alternative licensed providers; and
 - h. such other information as the Authority may require.
- 10.3. Digicel/BTC must promptly notify the Authority of any material event that may adversely affect implementation of the migration programme.

11. Conditions Precedent to Copper Service Withdrawal

- 11.1. Digicel/BTC must not discontinue copper-based services within an area unless:
 - a. the notification requirements of this Schedule have been satisfied;
 - b. replacement services are available to affected customers;
 - c. migration support arrangements remain available;
 - d. any reporting requirements specified by the Authority have been satisfied; and
 - e. any additional conditions imposed by the Authority have been fulfilled.
- 11.2. Digicel/BTC must provide the Authority with written confirmation of compliance with this section prior to the withdrawal of services in any area.
- 11.3. The Authority may require Digicel/BTC to provide a parish-specific compliance certificate demonstrating compliance with this Schedule before authorizing withdrawal of copper-based services in that parish.

12. Copper Network Decommissioning

- 12.1. Following completion of customer migration activities, Digicel/BTC must commence decommissioning of the copper network.
- 12.2. Decommissioning activities may include:
 - a. removal of redundant cables;
 - b. retirement of obsolete equipment;
 - c. recovery of network assets; and
 - d. associated engineering and construction activities.
- 12.3. Decommissioning activities must be undertaken in accordance with applicable laws, permits, licences and infrastructure agreements.

13. Authority Oversight

- 13.1. The Authority may require Digicel/BTC to provide additional information relating to the migration or decommissioning process.
- 13.2. The Authority may, where it considers it necessary for the protection of consumers or the orderly development of the electronic communications sector, direct Digicel/BTC to:
 - a. suspend migration activities;
 - b. delay service withdrawal;
 - c. implement additional customer protection measures;
 - d. undertake additional stakeholder engagement activities; or
 - e. take such other actions as the Authority considers appropriate.
- 13.3. Compliance with this Schedule must not relieve Digicel/BTC of any obligations imposed by law, licence condition, regulatory determination or direction issued by the Authority.