

March 1, 2018

VIA ELECTRONIC FILING


Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of Ex Parte Meetings
PS Docket No. 17-344**

Dear Ms. Dortch,

On February 27, 2018, Lawrence Freedman, Senior Vice President of WorldNet Telecommunications, Inc. ("WorldNet") met with Anita Panakar-Stoll, Chris Anderson, Kenneth Carlberg, Jeff Goldtharp, and Lauren Kravitz of the Commission's Public Safety and Homeland Security Bureau. In the meeting, Mr. Freedman shared copies of and discussed the attached presentation outline.

Respectfully submitted,

A handwritten signature in black ink that reads "Richard Davis". The signature is written in a cursive, flowing style.

Richard Davis
Counsel for WorldNet Telecommunications, Inc.

cc: Anita Panakar-Stoll
Chris Anderson
Kenneth Carlberg
Jeff Goldtharp
Lauren Kravitz

WORLDNET TELECOMMUNICATIONS, INC.

EX PARTE PRESENTATION

In the Matter of Hurricane Response, PS Docket No. 17-344

I. COMPANY INTRODUCTION

- A. WorldNet is a 22-year-old competitive telecommunications, cloud computing, and technology services company located in and serving the island of Puerto Rico.
- B. WorldNet has 150 employees and serves around 3,000 business customers in Puerto Rico, making it the third largest provider of telecommunications services in Puerto Rico (behind PRTC and AT&T).
- C. WorldNet has deployed a state of the art IP based broadband/telecommunications network that has “raised the bar” for standards of quality for all of Puerto Rico. It offers services on its own deployed fiber and wireless facilities as well as leased lines.
- D. WorldNet followed the “script” envisioned by Congress in the 1996 Act.
 - 1. Among the first local services resellers in Puerto Rico.
 - 2. The first UNE-based provider in Puerto Rico
 - 3. Invested more than \$40 million to build next-generation infrastructure, including IP-based softswitch, collocations, and select fiber deployments.

II. IMPACT OF THE 2017 HURRICANES

- A. Massive, island-wide power and communications outages
- B. WorldNet’s central office flooded
- C. Millions of dollars in WorldNet property damages
- D. Millions of dollars in WorldNet customer service credits
- E. Significant cost increases due to extraordinary expenses (e.g., employee overtime, fuel for generators, etc.)
- F. Loss of customers

III. WORLDNET’S HURRICANE RESPONSE

- A. Relocated and restored entire central office within 48 hours
- B. Restored administrative office service powered by generators
- C. Restored customer service as soon as possible
- D. Primary obstacles to recovery:
 - 1. Financial
 - 2. Power at administrative offices and at customer locations
 - 3. Network facilities leased from third-parties that seemingly prioritized the restoration of their own retail customers
 - 4. Shortages and inconsistency in supply of fuel for generators and materials

IV. PUERTO RICO NEEDS SPECIAL CONSIDERATION & FINANCIAL ASSISTANCE

- A. Historic island-wide economic hardship

- B. Millions of dollars in additional costs and lost revenues to smaller providers like WorldNet that threaten to be devastating to already lagging competitive communications service markets in Puerto Rico
- C. Unreliable power infrastructure
- D. Legacy communications infrastructure prone to recurring hurricanes

V. THE FCC CAN AND SHOULD HELP

- A. Primary mission of the FCC to foster quality communications systems throughout the country.
- B. Commenters have outlined ample legal authority for the FCC to authorize special financial assistance to Puerto Rico. See, e.g., PRTC Petition for Emergency Funding.
- C. Puerto Rico's issues extend island-wide, not just to rural areas.