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May 1, 2019

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

**Re: *The Uniendo a Puerto Rico Fund and the Connect USVI Fund*, WC Docket Nos. 18-143, 10-90, 14-58; Notice of *Ex Parte* Presentation**

Dear Ms. Dortch,

On April 29, 2019, Mary Henze, Cathy Carpino and the undersigned of AT&T Services, Inc. (AT&T) met with Daniel Kahn, Alex Minard, Dangkhoea Nguyen and Rebekah Douglas of the Wireline Competition Bureau and Garnet Hanly, Jonathan Lechter and Matthew Warner of the Wireless Telecommunications Bureau to discuss the Notice of Proposed Rulemaking in the Uniendo a Puerto Rico Fund and the Connect USVI Fund proceeding. Ms. Carpino and Mr. Warner participated via telephone.

During the meeting, AT&T described the unique characteristics of the Puerto Rico and U.S. Virgin Islands wireless market. In particular, AT&T explained that subscriber mobile data use in these jurisdictions has more than doubled since the 2017 hurricane season. During the initial aftermath of hurricane Maria, this increase in mobile data use was driven by the fact that many households across both jurisdictions no longer had access to fixed broadband services at home as the wireline network had not yet been restored and consumers were relying on, among others, AT&T's mobile network for home broadband use. Original expectations that mobile data usage would eventually go down to pre-Maria levels as wireline networks got restored have not materialized to date and AT&T is still experiencing extremely high mobile capacity usage in these markets. Current per subscriber data usage in these jurisdictions is more than double the average subscriber data usage across the entire AT&T U.S. network. Further, AT&T anticipates that this growth will continue over the coming years.

This unique circumstance presents unique network management challenges above and beyond those stemming from the severe destruction caused by the 2017 hurricanes. To meet these challenges, AT&T continues to allocate resources to restore and upgrade the network beyond its pre-hurricane capacity. AT&T is also heavily investing in hardening the network in preparation for future hurricane seasons. Hardening efforts include, but are not limited to, burying fiber backhaul network where possible, expanding microwave backhaul redundancies where fiber burial is cost prohibitive, hardening vertical structures, and expanding and continually upgrading backup generators to support all cell sites.

Given these unique circumstances, AT&T recommended that the Commission permit Stage 2 mobile recipients to use this support for network restoration efforts and implementation of standard industry hardening practices where feasible. AT&T continues to support its proposal set forth in its



comments and urges the Commission to adopt it.<sup>1</sup> In the event the Commission seeks to impose a minimum service obligation on Stage 2 mobile recipients, AT&T suggests that the Commission consider the following, which would apply at the end of the 3-year service term:

- fund recipients in Puerto Rico should demonstrate that across at least one-third of all municipios, one-third of drive tests measuring network performance meet download speeds at or above 10 Mbps and upload speeds at or above 1 Mbps; and
- similarly, and in recognition of unique characteristics and challenges in the U.S. Virgin Islands market, fund recipients in that jurisdiction should demonstrate that one-fourth of drive tests measuring network performance meet download speeds at or above 10 Mbps and upload speeds at or above 1 Mbps across all islands.

Under AT&T's proposal, fund recipients would be required to certify that their network performance drive tests comply with specifications defined by the Commission. Additionally, consistent with the Commission's Mobility Fund II ("MF II") service coverage challenge process, speed tests would have to be conducted across the daily timeframe of 6:00 am and 11:59 pm.

AT&T's proposal is consistent with the Commission's proposed service obligations for Stage 2 mobile fund recipients while accounting for the significantly shorter support term. In particular, the Commission has proposed that service providers receiving support would be required to restore their pre-hurricane coverage area at a level of service that meets or exceeds MF II standards.<sup>2</sup> The MF II program will be a 10-year program. By contrast, the Commission's proposal for the Puerto Rico and U.S. Virgin Islands Stage 2 fund for mobile providers is a 3-year program – less the one-third the timeframe of the MF II program. Accordingly, AT&T proposes that the Commission require fund recipients to meet approximately one-third of the MF II service standards at the end of the proposed 3-year timeframe.

Please contact me if you have any questions related to these matters.

Sincerely,

/s/

Raquel Noriega

cc:

Rebekah Douglas WCB  
Garnet Hanly WTB  
Daniel Kahn WCB  
Jonathan Lechter WTB  
Alex Minard WCB  
Dangkhwa Nguyen WCB  
Matthew Warner WTB

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<sup>1</sup> Comments of AT&T, WC Docket Nos. 18-143, 10-90, 14-58 (filed July 26, 2018).

<sup>2</sup> *The Uniendo Puerto Rico Fund and Connect USVI Fund, Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 18-143, 10-90, 14-58, Order and Notice of Proposed Rulemaking, FCC 18-57, at ¶ 85 (rel. May 29, 2018).