

May 24, 2019

**VIA ECFS**

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

**Re: *In the Matter of The Uniendo a Puerto Rico Fund and the Connect  
USVI Fund, WC Docket No. 18-143***

Dear Ms. Dortch:

WorldNet Telecommunications, Inc. (“WorldNet”) respectfully submits this letter as a supplement to its previous submissions in this docket.

In its past submissions in this docket, WorldNet has urged the Commission to adopt a process for second stage funding that enables competitive providers, like WorldNet, to have a real and material role in the rebuilding process for Puerto Rico. In other words, the second stage should not just be the “incumbent LEC gets all of the money” (i.e., federal funding) to rebuild Puerto Rico. We’ve already lived through the era of a dominant incumbent provider in Puerto Rico known for decades of poor service and the status of Puerto Rico as a telecommunications backwater. The Commission’s funding process should not be hard-wired in advance to favor the incumbent provider, like PRTC, who already has an inherent advantage over smaller, more focused providers like WorldNet (e.g., the advantages of economies of scale, larger resources, access to commercial financial markets, etc.). Rather, the Commission should also consider things like the importance of facilitating and growing competitive options, the importance of equipping the life-blood of Puerto Rico’s economy (i.e., businesses) with innovative, tailored services and service options (including new service tools like cloud and IT options such as hosted telephony, virtual servers, analytics, and equipment), and the now well-apparent need to have network redundancy options. Put differently, the Commission’s funding decisions, by whatever process the Commission chooses to establish, should be focused not just on re-building and expanding physical networks, but on fostering a diverse, competitive market place in the areas of Puerto Rico that will most contribute to Puerto Rico’s long term recovery, growth, and transformation into a place where Puerto Ricans have the same communication security, reliability, and options as those now enjoyed by all other US citizens.

Over the past few months, the discussion from PRTC has continued to focus on establishing a process that gives virtually no consideration or weight to growing competition in Puerto Rico. Rather, by focusing solely on things like efficiency and administrative convenience (e.g., funding only for build-outs to extensive geographic areas), their comments have focused on establishing a process that will use public funds to simply grow its market dominance and seeks to coopt the entire Uniendo fund to reestablish the same single-provider future for Puerto Rico

that, in the past, has left Puerto Rico far behind virtually every other United States jurisdiction in telecommunications service quality. Indeed, PRTC is not just telling the Commission that the Commission should just give PRTC all of the Uniendo fund money (or, alternatively, establish a funding process that will inherently favor PRTC to get virtually all of the money), PRTC is also telling the Commission, in the USTelecom forbearance proceeding, that PRTC should also not be forced to share any of its soon-to-be largely publicly-funded network with any competitor. The FCC should reject this brazen approach to gain market hegemony using US tax dollars from a company owned by a foreign multi-billionaire.

In WorldNet's view, there is a place for considerations like efficiency and administrative convenience in making Uniendo funding decisions. But, WorldNet respectfully submits that the Commission will do more harm than good in focusing on such consideration to the exclusion of creating a funding process that also preserves and/or improves the competitive marketplace and rewards innovation in Puerto Rico. To this end, the Commission must establish a second stage funding process that includes and creates a level playing field for competitive providers, like WorldNet. This must include things like allowing funding bids for for smaller, more targeted geographic areas, like census blocks, counties, or subbarrios. Or, alternatively, the Commission must establish a pathway for competitive providers, like WorldNet, to utilize Uniendo-funded network facilities so that the effect of the Uniendo process is not just to subsidize PRTC in the hope that it build-out networks in Puerto Rico at the cost of reestablishing and/or exacerbating the problems inherent in PRTC's historical monopoly.

For years, WorldNet has been a market leader in transforming and improving Puerto Rico's communications networks, service options, and service quality. WorldNet does not have the scale or reach of PRTC's resources or network presence. And, WorldNet does not have the subscriber counts that these other providers have, largely because of WorldNet's focus on non-residential, business consumers. But, WorldNet has become an integral part of Puerto Rico communications markets, providing innovative, state-of-the-art service options to small and medium, as well as large, Puerto Rico businesses that are vital to the long-term success and prosperity of all Puerto Ricans. The Commission need not look any further than the innovative solutions that WorldNet delivered after Hurricane Maria in creating a product to use solar panels to power disrupted networks. Realistic and fair access to Uniendo a Puerto Rico Fund funding can and should allow innovative competitors to be an integral part of Puerto Rico's future.

Respectfully submitted,

/s/ Richard Davis

Richard Davis

Outside Counsel

WorldNet Telecommunications, Inc.