



Ave. De la Constitución #316. San Juan, Puerto Rico 00901  
TEL. 787 724-4842 Fax. 787 722-4843

June 27, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, N.W.  
Washington D.C. 20554

**Re: Certification for Stage 1 Funding  
Uniendo a Puerto Rico Fund  
WC Docket Nos. 18-143, 10-90 and 14-58**

Dear Ms. Dortch:

Data@ccess Communications, Inc. ("Data@ccess" or "the Company") respectfully submits the attached Certification in response to the Commission's Order released on May 29, 2018 in the above-referenced proceeding inviting any facilities-based providers of voice and broadband Internet access services, even if they have not previously received universal service support, to participate in Stage 1 of the Uniendo a Puerto Rico Fund (the "Stage 1 Order"). Data@ccess very much appreciates the Commission's efforts to establish a funding mechanism to aid in the restoration and expansion of communication networks in Puerto Rico following the extensive damage caused by Hurricanes Irma and Maria in 2017. Data@ccess welcomes the opportunity to participate in this important program.

Data@ccess was founded in 1999 and is a privately-owned provider of fixed wireless and fiber-based broadband Internet access services. Based in San Juan, the Company provides services throughout Puerto Rico. It provides Internet access services, Voice over Internet Protocol ("VoIP"), and resells telecommunications services as a CLEC. The Company's primary focus is providing principal and redundant services to commercial and government entities in Puerto Rico.

Like all other providers in the area, Data@ccess's operations, infrastructure, equipment and customer base were significantly affected by wind and other damage caused by Hurricanes Irma and Maria. During both hurricanes (Maria, in particular), Data@ccess personnel worked around the clock to maintain critical Internet service to its customers. Immediately following the hurricanes, Data@ccess began rebuilding and returning to normal operating conditions, primarily relying on its own resources, with some insurance support. As of today, Data@ccess has restored service to nearly all its customers.

#### **STAGE 1 ORDER REQUIREMENTS**

Data@ccess reported to the FCC on Form 477 filed September 1, 2017, the number of subscribers to its I-VoIP service as of June 30, 2017. In the certification and attachments enclosed with this filing, Data@ccess provides support for its current number of subscribers.

Upon its selection for funding under the Uniendo a Puerto Rico Fund, Data@ccess will promptly file for designation as an eligible telecommunications carrier ("ETC") in Puerto Rico and submit such designation to USAC, and pledges to remain an ETC for at least one year after receiving funding. Also Data@ccess will use such funds in a manner consistent with the Stage 1 Order and understands it will be subject to 2018 USAC audits.



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## REQUEST FOR CONFIDENTIALITY

The Company respectfully requests confidential treatment of certain information and documents in this filing, because this information is competitively sensitive and its disclosure would have a negative competitive impact on the Company were it made publicly available. Such information would not ordinarily be made available to the public and should be afforded confidential treatment under 47 C.F.R. §§ 0.457 and 0.459.

The reason for this request is that specific information in this filing is confidential and proprietary to Company as "trade secrets and commercial or financial information" under Section 47 C.F.R. § 0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information in connection with Company's ongoing business and operations.

In accordance with 47 C.F.R. § 0.459, the Company provides the following details to the Commission to support its request for confidential treatment of certain information and documents in this filing:

- Information for which confidential treatment is sought: The Company requests that specific information in the filing regarding the number of customers of the Company and supporting documentation be treated as confidential. The Company will identify confidential information in its Responses by marking it "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**" The Company will redact its public version to remove confidential information.
- Commission proceeding in which the information was submitted: The information is being submitted as part of **WC Docket Nos. 18-143, 10-90 and 14-58.**
- Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged: The number of customers and the contents and nature of the supporting documents is commercial information and contains trade secrets. The information is competitively sensitive information and is not normally released to the public. As such, its release would have a substantial negative competitive impact on Company.
- Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm: The market for the services the Company provides is competitive; thus, the release of this confidential and proprietary information would cause the Company competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of Company's business at a level of detail not currently available to the public.
- Measures taken by the Company to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosures of the information to third parties: The Company has treated and continues to treat the non-public information identified as confidential in these Responses as confidential and has protected it from public disclosure to parties outside of the Company.



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- Justification of the period during which Company asserts that the material should not be available for public disclosure: The Company cannot determine at this time any date on which this information should not be considered confidential.
- Other information Company believes may be useful in assessing whether its request for confidentiality should be granted: Under applicable Commission decisions, the information in question should be withheld from public disclosure.

Executed on June 27, 2018.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "E. Amador", is written over a horizontal line.

Edward Amador Rodríguez  
Chief Financial Officer

Enclosures



REDACTED PUBLIC VERSION



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CERTIFICATION

I, Edward Amador Rodriguez, Chief Financial Officer of Data@ccess Communications, Inc. ("Data@ccess"), hereby certify under penalty of perjury that the following is true and correct:

Data@ccess's Form 477 filed on September 1, 2017, as amended, reflects that it had [BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION] customers as of June 30, 2017. The updated analysis made for this filing reflects that the total number of subscribers [BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION].

The subscriber figure is supported by the following evidence:

1. Form 477 filed on September 1, 2017.
2. [BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION].
3. [BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION].
4. [BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION].
5. [BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION].

Executed on June 27, 2018.

A handwritten signature in blue ink, appearing to read "E. Rodriguez", is positioned above a horizontal line.

Edward Amador Rodriguez  
Chief Financial Officer

**ATTACHMENTS**  
**PUBLIC VERSION**

**REDACTED**