



July 2, 2018

Federal Communications Commission

Re: WC Docket Nos. 18-143, 10-90 and 14-58; FCC 18-57

Proposed Rule by **FCC** on **06/13/2018** ID: FCC-2018-0212-0002

<https://www.fcc.gov/ecfs/filings>

Dear Members of FCC:

The “Liga de Cooperativas de Puerto Rico” is a legitimate representative of the cooperative system in the island. This include 115 financial cooperatives with around 1.2 million members and depositors, and more than 200 other cooperative than bring all kind of service to our people.

It is a fact that after the emergency caused by the Hurricane María, the cooperatives were the first entities that opened their sets to offer service to the citizens. Despite the collapse of the communication systems, the credit unions and our pharmacy and supermarket networks distributed by all our municipalities, offered the essential services that laid the foundations for the process of Recovery.

Having known that the United States Federal Communication dedicates efforts and resources to promote the recovery of our communication systems, we wish to express our interest in contributing to the initiatives and proposals of **Uniendo a Puerto Rico Fund**.

In the wake of the devastation of communication networks, the Commission has publicly stated it recognizes the need for a longer-term solution to “rebuild, improve and expand service in Puerto Rico and the U.S. Virgin Islands. The Commission proposes to dedicate funding specifically to “fixed and mobile providers” to provide critical “fixed voice and broadband services.” However, on behalf of the U.S. citizens residing on these islands, we request you to consider that any long-term investment in the communications infrastructure of Puerto Rico must include satellite technology. Satellite broadband was the only reliable communications system in the aftermath of the hurricanes and must be fully implemented across the island to build a truly resilient and connected Puerto Rico.

Satellite broadband is a multifaceted system that allows for cellular communication as well as internet connection. Because it is not a terrestrially based system, satellite is protected from the threat of storms and natural disasters. Satellite is also more cost effective, unlike installing cell towers, telephone poles and restringing fiber. Satellite can also connect even the most remote Puerto Rican communities to much needed emergency services and resources. Finally, satellite is a timelier solution to protect Puerto Rico in the face of future natural disasters. As storms increase in frequency and strength, it is imperative that Puerto Rico rebuild its demolished infrastructure to withstand the next hurricane season.

Satellite technology is currently being utilized with great success across the continental United States, even made available through FCC subsidies to the most remote and unserved locations. Advances in technology now offer next-generation satellite system that can provide Puerto Rico with the latest technology and ever-increasing broadband speeds. To exclude satellite technology from inclusion in the **Uniendo a Puerto Rico Fund** would be a grave oversight.

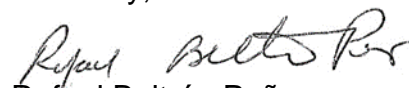
After experiencing the trauma that resulted from being isolated with no communication post-Hurricane María, we are committed to making satellite broadband a reality and accessible throughout Puerto Rico. Working with telecom industry leaders, we are collaborating in the newly formed **Centros de Preparación y Respuesta (CPR)**, a satellite connected network of member organizations across Puerto Rico.

Through CPR, organizations such as ours will have a reliable communications system to ensure the residents the communities we serve will remain connected to each other, to emergency services, to community organizations such as schools, hospitals, fire departments, government and more – regardless of storm or emergency severity. The CPR system will provide preparation, coordination and response to before and after a disaster event. This will ensure that communities across the island, no matter how remote, have access to all the critical care services they need, including food, shelter, medical services, and emergency responders, at times of crisis.

As one of the organizations of more effective during the emergency and direct access to the needs of our citizens we request from you that consider our application by placing Puerto Rico in the FCC funding strategy.

Thank you for your dedication to serving the people of Puerto Rico during this difficult time and for your consideration of our remarks. Should you have any questions or wish to speak further, please contact us at Liga de Cooperativas de Puerto Rico, Tel. (787) 764-2727.

Sincerely,



Rafael Beltrán Peña
President Board of Directors