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Federal Communications Commission  
445 12th Street SW, Washington, DC 20554  
<https://www.fcc.gov/ecfs/filings>

The United Retailers Association or Centro Unido de Detallistas (CUD) is the oldest most diverse private sector organization in Puerto Rico representing local businesses with more than 120-year heritage of supporting economic growth on the Island.

Lack of reliable, fully operative telecommunication facilities after hurricanes Irma and Maria, had and still has, caused irreparable damage to Puerto Rico's economy and has negatively impacted thousands of small businesses, the heart of the island's private sector and principal job creator.

Understandably, without a functional telecommunication system, during and after a major storm or other natural disaster, businesses in Puerto Rico cannot communicate effectively with their employees, suppliers, customers, banks, and health and security-related entities, among others, resulting in more closed businesses, loss of jobs, increased migration, and loss of revenue to a government currently faced with serious financial problems.

As a result, we have built a coalition of stakeholders that include government, the healthcare industry, and businesses to identify a communications solution that will support public safety by securing the distribution of essential products and services to communities in need. At the same time, the solution must support economic resiliency as the island suffers unemployment, dwindling tax revenue, and large debts.

After careful planning, we seek to deliver a cost effective secure island-wide emergency response Digital Mobil Radio (DMR) communications network that is capable of interoperating with Analog and P25 as utilized by the US local, state and federal government. The network will be based on a dedicated frequency with no reliance on the local power authority. The plan is well beyond concept. It can be deployed within 90 days and would impact more than 290,000 U.S. citizens.

To date, we have provided comments addressing the lack of a robust communications network to several entities involved in the reconstruction of Puerto Rico including: 1) Financial Oversight and Management Board for Puerto Rico; 2) FEMA; and 3) The Bipartisan Congressional Task Force on Economic Growth in Puerto Rico.

Sincerely,

Nelson J. Ramírez  
President