



July 5, 2018

Ajit Pai, Chairman
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

**On Behalf of: ASPIRA Association
ASPIRA de Puerto Rico**

Dear Chairman Pai:

ASPIRA Association is the only national organization dedicated exclusively to the education of Puerto Rican and other Latino youth. **ASPIRA de Puerto Rico** has been serving low-income communities for over four decades. **ASPIRA Association** and **ASPIRA de Puerto Rico** have been especially active in providing aid and support to the people of Puerto Rico after the devastation of the hurricanes on the Island. Moreover, for over 20 years, ASPIRA has been a strong advocate for ensuring that our communities, especially our schools and youth, have access to affordable, reliable mobile and high-speed broadband.

In keeping with these long-standing commitments, we are submitting these comments to the Commission regarding the implementation of the second stage of the \$750 million **Uniando a Puerto Rico Fund** to “speed longer-term efforts to rebuild fixed and mobile voice and broadband networks in the territories and harden them against future natural disasters” as well as expand broadband and mobile services where they were unavailable before the hurricanes.

We commend the Commission, and you as Chair, for your leadership in this long-term reconstruction effort. However, the current proposal limits the use of the Fund to “fixed and mobile” carriers. **It is our view is that rebuilding the infrastructure that existed before the hurricanes, an infrastructure that failed so badly, and even “hardening” it, is totally inadequate.** Puerto Rico needs innovative, resilient, sustainable and affordable alternatives, as well as a major expansion of services to areas previously not served, especially the rural areas of the Island.

We believe that a **satellite alternative** must be included in this long-term investment. Satellite-based voice and broadband were the only ones able to provide reliable services in the immediate aftermath of the hurricanes, proving its value to emergency services, first responders, hospitals and municipalities.

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Second, in including a satellite-based alternative, priority must be given to emergency services -first responders, law enforcement, firefighters, hospitals, pharmacies, municipalities, schools, shelters, and community organizations on the ground, as well as financial institutions and food distribution centers. Satellite-based services have shown to withstand the severe storms like the ones that devastated Puerto Rico, and can be deployed rapidly, ubiquitously, and at a low cost.

Third, satellite services are the best suited to reach rural, mountainous, isolated communities that did not have service before the hurricane. It can reach rural schools, local clinics, pharmacies, financial institutions -such as coops that thousands in Puerto Rico rely on- even supermarkets, as well as homes in these hard-to-reach areas.

Finally, this long-term reconstruction effort is an enormous opportunity to promote economic development in Puerto Rico and that priority should be given to local, Puerto Rican providers that will maximize the retention of capital and create jobs in Puerto Rico.

In supporting a satellite alternative, we wholeheartedly support the efforts of the newly created **Centros de Preparacion y Respuesta (CPR)**, a satellite connected network of member organizations across Puerto Rico that focuses on disasters and expanding services to rural communities. CPR is already working closely with local and stateside universities, researchers, the industry, and international organizations with expertise in emergency telecommunications systems to build a resilient and sustainable satellite alternative for the Island. As part of this solution, we urge the Commission to restore funds to local commercial satellite in Puerto Rico.

We have all seen the consequences of months of communities being isolated after the hurricanes, with hospitals, first responders and government without communication, and of people dying. Never again should Puerto Rico suffer as it has the last several months.

I again commend and thank the Commission as well as you personally for your commitment to better serve the people of Puerto Rico. We greatly appreciate your consideration of our comments on this critically important topic. Should you have any questions or need any additional information, please feel free to contact me at (202-309-2053).

Sincerely,

Ronald Blackburn-Moreno
President and CEO
ASPIRA Association

Dr. Adalexis Rios Orlandi
Executive Director
ASPIRA de Puerto Rico, Inc.