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July 5, 2019

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

Re: Nunc Pro Tunc Ex Parte Notice by Coalition to Fund Caribbean Preparedness and Response
("CPR")

Dear Ms. Dortch,

On March 11, 2019, representatives of CPR met with two groups of FCC personnel, as described below. Inadvertently, the required Ex Parte Notice was not filed until now. CPR respectfully requests acceptance of this Ex Parte Notice on a Nunc Pro Tunc basis.

1) WASHINGTON DC FLY-IN PARTICIPANTS On behalf of the **Coalition to Fund CPR**

CPR Role	Prefix	First Name	Last Name	Title	Agency / Organization
Chair	Dr.	Marines	Aponte	Professor	Finance Department, University of Puerto Rico
Member	Mr.	Jose	Luis Rodriguez	President & CEO	CRG Communications Inc.
Member	Rev.	Roberto Luis	Lugo	Leader	Sociedad Biblica
Member	Mr.	Jimmy	Torres	President	Puerto Rican Action Initiative
Member	Mr.	Ronald	Blackburn-Moreno	President & CEO	ASPIRA Association
Member	Mr.	Jose	Marquez	President & CEO	Latinos in Information Sciences and Technology (LISTA)
Member	Mrs.	Gretchen	Sierra-Zorita	Executive Committee	National Puerto Rican Agenda (NPRA)
Supporter	Mr.	David	Hartshorn	CEO	Geeks Without Frontiers
Supporter	Mr.	Robert	Bell	Executive Director	World Teleport Association

CPR believes that the individuals attending from the FCC were Daniel Kahn, Rebekah Douglas, and Alexander Minard of the Wireline Competition Bureau; Roberto Mussenden of the Public Safety and Homeland Security Bureau; Michael Carowitz of Chairman Pai's office; and Evan Swartztrauber of Commissioner Carr's office.

II.) A summary of the arguments presented by the CPR group to the FCC:

A. Funding Eligibility.

1. Community based organization eligibility. CPR emphasized the importance of allowing innovative community based efforts like those of Caribbean Preparedness and Response. Inc. (CPR). The Commission should provide funding for restoration/upgrade by the only active commercial teleport facility on the island. Campo Rico Group, Inc and Coalition to Fund CPR members, are proposing to construct facilities in about 500 centers in 18 different sectors.

2. Locally Satellite based facility (Teleport). CPR argued that locally based satellite facilities are not eligible as an ETC in Puerto Rico, therefore, they could not be eligible for the Uniendo a Puerto Rico Fund. Rather than granting waivers, as was discussed, the Commission could establish eligibility. At the present time there is only one entity that could qualify as such, Campo Rico Group, Inc. (CRG), (a member of the Coalition to Fund CPR). CRG would be the headend for the CPR network.

B. Funding for Restoration, interconnection and upgrade of locally based Satellite Facilities (Teleport). CPR advocated technology diversity and neutrality. CPR also made clear, that satellites need to be included in the technological solutions or financial support of the Uniendo, a Puerto Rico Fund. CPR stated that satellites proved to be the most important communications technology, for months after the disaster. Yet the proposed rules were biased against satellite technology, and its local facilities based representative. CPR asked that the Commission correct that bias.

CPR stated that satellite facilities were not part of the approximate \$130 million distributed for restoration in Puerto Rico to local telecommunications companies. CPR argued that the Commission should correct that in order to have this resource available on the island and to prepare it for future disasters. This resource was available in the past and unfortunately, not for Hurricane Maria. CPR argued that this facility must be interconnected to other terrestrial

telecommunications carriers on the island to take full advantage of its location. There are about five carriers with fiber less than 15 feet away from CRG facility and none has taken advantage, at the present time, to interconnect to the only satellite teleport operating, on the island, and to have a potential emergency back up system close by.

C. Satellite technology should be eligible for funding under the Uniendo a Puerto Rico Fund. CRG advocated technology diversity and neutrality and made clear, that satellites need to be included in the technological solutions and in the financial support of the Uniendo a Puerto Rico Fund. CRG stated that satellites prove to be the most important communications technology, for months after the disaster.

Chairman Pai, while visiting the island to review the impact of the disasters on the telecom infrastructure said Puerto Rico should look into the new satellite technologies being developed, as part of the solutions needed to prepare Puerto Rico for future disasters.

D. Rural and hard to reach Municipal areas. The Commission should focus its funding support in the most needed areas such as rural and hard to reach mountain regions of PR. CPR efforts are focus, precisely, in these areas. These are areas where satellite technology could be most useful, while complementing existing telecommunications infrastructure, in more urbanized areas.

E. The government of PR supports satellite technology. The Puerto Rican government has develop about 33 recommendations for disaster resiliency funds to improve telecommunications on the island. They highlighted the geographic areas where there were challenges with the telecommunications services even before Maria. Five of these recommendations include satellite technology.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



Ernest T. Sanchez
for the Coalition to Fund CPR

CPR Brochure Attached

CC:Daniel.Kahn@fcc.gov and dangkhoa.nguyen@fcc.gov