

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

July 25, 2018

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 Ms. Dortch:

The Puerto Rico Bible Society, together with the churches and faith-based community organizations, offer vital services in different and varied areas in the communities where they are located. The church has as priority in its agenda the integral well being of the community. After the passage of hurricanes Irma and Maria on the island of Puerto Rico, the churches were the front line of response and service to address the very serious emergency that Hurricane Maria left in Puerto Rico. Among the services that were offered, are the following: provision of food, drinking water, shelter, spiritual and emotional support, reconstruction and restoration of houses, among other aids. At the community level, the work carried out was vital in the process of saving lives and offering hope to the families that were affected by these hurricanes.

One of the greatest difficulty that we faced as a people was the absence of a communication system that would allow the coordination of efforts in a concerted and effective way among our Churches, Councils, other faith-based organizations, municipal, state and federal agencies. All our communication system was totally devastated and unable to serve at the time of greatest urgency and need. This reality caused, very regrettably, the loss of lives and the possibility of responding with efficiency and coordination to the emergency that the passage of this hurricane category 5 caused for our island.

The electric power, drinking water and communication services must be a priority in the national agenda of any country to guarantee the life, security and integral welfare of a people. The passage of Hurricane Maria through Puerto Rico revealed the fragile infrastructure that our island has in these fundamental areas. The infrastructure in the energy and communications area was basically devastated by this Hurricane. This means the urgent need to rebuild our communications and energy systems, taking into consideration the latest technological advances and the ability to resist and maintain these essential services in the face of the possibility of a catastrophic event.

We submit these comments for consideration by the Commission regarding the implementation of **Uniendo a Puerto Rico Fund**.

We support the efforts of the **Coalition to Fund CPR (“Centros de Preparación y Respuestas”)**

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” in the wake of the devastation of communication networks. The Commission proposes to dedicate funding specifically to “fixed and mobile providers” to provide critical “fixed voice and broadband services.”

On behalf of the U.S. citizens living on these islands, we respectfully request you to consider the following. It is undeniable that these islands need and deserve reliable communication systems that can withstand natural disasters and prevent our fellow citizen from ever suffering such devastation again. As such, the funds dedicated through the Uniendo a Puerto Rico Fund are well directed. We strongly suggest that the Commission include in the proposed rules for the distribution and implementation of the funds the following:

1. Stage 1 funding was too narrowly focused. It excludes locally based satellite facilities. This hampers economic development in Puerto Rico.
2. New entrants with exciting technology better able to withstand extreme weather and natural disasters were inadvertently excluded.
3. Stage 2 and later rounds of funding must be available⁹ to new entrants. Specially entrants with satellite facilities in Puerto Rico.

It is also imperative that the FCC understands that any long-term investment in the communications infrastructure of Puerto Rico **must** include satellite technology. Not only must satellite technology be included, it must be **a priority** in any restoration funding efforts. Satellite broadband was the only reliable communications system in the aftermath of the hurricanes and must be fully implemented across the island, specially in rural and mountainous areas, in order to build a truly resilient and connected Puerto Rico. **Funding must allow for innovative, independent community based and multi sector telecommunications networks to be established.**

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 (787) 568-4125 or our email address: hmartinezrivera@gmail.com.

Sincerely yours,



Rev. Heriberto Martinez Rivera
General Secretary
Puerto Rico Bible Society