

July 26, 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

Via: https://www.fcc.gov/ecfs/filings

Dear Chairman Pai:

The National Puerto Rican Agenda (NPRA) is a nonpartisan alliance of stateside organizations, elected and community leaders, and volunteers. We are actively engage with Puerto Rico’s economic recovery and promote Puerto Rican political and civic participation in the United States. As a community-based organization that provides vital services to the people of Puerto Rico and has been instrumental in providing aid in the aftermath of the hurricanes, we submit these comments for consideration by the Commission regarding the implementation of **Uniendo a Puerto Rico Fund.**

The NPRA wholeheartedly supports the efforts of the Coalition to Fund CPR (**Centros de Preparación y Respuestas**). Below is the rationality for our position.

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 through the Uniendo a Puerto Rico Fund to support “fixed and mobile providers” to provide critical “fixed voice and broadband services.” Currently the proposed rules for the distribution and implementation of the funds are woefully misguided.

To insure that these funds are well directed, we respectfully recommend the following:

1. That the FCC requires that any long-term investment in the communications infrastructure of Puerto Rico must include satellite technology. Stage 1 funding was too narrowly focused. It excludes locally based satellite facilities. This hampers economic development in Puerto Rico. Not only must satellite technology be included, it must be a priority in any restoration funding efforts targeting satellite-based facilities in Puerto Rico. Satellite broadband was the only reliable communications system in the aftermath of the hurricanes and must be fully implemented across the island in order to build a truly resilient and connected Puerto Rico.
2. Priority for reliable satellite communications system is given to first responders and emergency services, to community organizations such as police, schools, hospitals, fire departments, municipal governments and others, especially those serving remote and isolated communities. New entrants with exciting technology better able to withstand extreme weather and natural disasters were inadvertently excluded. Stage 2 and later rounds of funding must be available to new entrants. Specially entrants with satellite facilities in Puerto Rico.
3. After experiencing the trauma that resulted from being isolated with no communication post-Hurricane Maria, working with telecom industry leaders, we support the newly formed **Centros de Preparacion y Respuesta (CPR)**, a satellite connected network of member organizations across Puerto Rico. This network gives priority and serves isolated communities across the island to have access to all of the critical care services they need, including food, shelter, medical services, and emergency responders, at times of crisis.

As one of the organizations with boots on the ground that support rebuilding and preparedness efforts in Puerto Rico, we hope you will take seriously our call for investments in satellite broadband technology to support communities in Puerto Rico, especially those in remote areas that serve the most disadvantaged populations.

Satellite broadband was the only reliable communications system in the aftermath of the hurricanes. Iin order to build a truly resilient and connected Puerto Rico, satellite communication must be fully implemented across the island, especially in rural and mountainous areas. A successful implementation of **Uniendo a Puerto Rico Fund** requires that funding support 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 National Puerto Rican Agenda, PO Box 860075, Ridgewood, NY 11386-0075, or [npragenda@gmail.com](mailto:npragenda@gmail.com).

Sincerely,

Nilda Ruiz, President

Ron Blackburn, Vice-President

Edwin Melendez, Secretary

Roseni Plaza, Treasurer

Gretchen Sierra -Zorita, Communications