

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:

I write this letter as the President of RC Consulting Group LLC, a consulting firm that is domiciled in Culebra, Puerto Rico, an island 17 miles off the coast of the main island of Puerto Rico. In the aftermath of the hurricanes the island was isolated with no telephone, internet and very limited transportation. It was vital that we be able to communicate with our clients, primarily in the United States. After securing a satellite based system for internet and voice over internet, we were able to reestablish our connections to our clients. Without this we would have had to leave Puerto Rico at a very challenging time, rather than continuing our work and paying taxes in our little municipality.

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

I 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 residing on these islands, I implore 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 countryman 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.

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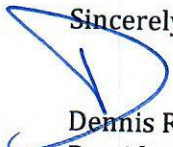
2. New entrants with exciting technology better able to withstand extreme weather and natural disasters were inadvertently excluded.

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. Satellite broadband is a multifaceted system that allows for cellular communication as well as internet connection. Because it is not a terrestrially based system, satellite is protected from the threat of storms and natural disasters. Satellite is also more cost effective, unlike installing cell towers, telephone poles and restringing fiber which can cost over \$22,000 per mile. Satellite can also connects even the most remote Puerto Rican communities to much needed emergency services and resources. Finally, satellite is a more timely solution to protect Puerto Rico in the face of future natural disasters.

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 me at ranchoculebra@aol.com

Sincerely,



Dennis Rivera
President
RC Consulting Group LLC