



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

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 as President and CEO of Campo Rico Group, Inc./CRG Communications.
www.camporicogroup.com a **Puerto Rico based telecommunications company**. Perhaps the only license teleport facility left standing in the island, after Irma and Maria hurricanes. This facility withstood six storm in the island without being impacted, except for energy. It represents a telecommunications resource in times of disaster for Puerto Rico and the Virgin Island and yet it needs to be recognized as such by the local business, and government local and federal.

CRG specializes in and provide broadband connectivity through satellite technology. CRG is a satellite internet service provider with the capacity to provide timely cost-effective solutions for sustained communications before and after of natural disasters in Puerto Rico. As a member of the Global VSAT Forum, World Teleport Association and participant in the UN Global Emergency Telecommunications Cluster gatherings.

CRG is using its contacts and knowledge in assisting in the creation of Centro de Preparación y Respuesta (CPR). This effort aims to organize, and manage local, customized, scalable consortiums of organizations with common interests and a strong willingness to collaborate. Together, the members of these groups will take part in a coordinated satellite communications network as an innovative solution to efficiently prepare for, coordinate, recover from, natural and other disasters. CRG is a member of the Coalition to Fund CPR which seeks to secure funding for CPR.

CPR is a coordinated satellite network of member organizations like yours that would be connected to each other, to emergency services, to community organizations such as community centers, schools, hospitals, fire departments, municipal emergency centers, police departments, food chain entities like supermarkets and restaurants, financial institutions like cooperatives, pharmacies, refugee centers and more – regardless of storm or emergency severity. The CPR system ensures that the community groups that serve Puerto Ricans even in the darkest of times are equipped with the life-saving communications equipment they need in order to access the resources required to serve their communities.

But more importantly, with a system that assures preparation, coordination and response before and after a natural disaster even. Working closely with local and stateside universities, researchers, the industry and international organizations with expertise in emergency telecommunications systems. These organizations will help design and build innovative communications strategies using advance technology. Technologies that are cost effective and promptly meet the the critical needs of the most impacted communities.

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. It should be expanded. Otherwise this will hamper economic development in Puerto Rico and innovation.
2. New entrants with exciting technology better able to withstand extreme weather and natural disasters were inadvertently excluded. The commission should provide funding to include them.
3. Stage 2 and later rounds of funding must be available 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.**

Leading minds in the telecommunications and spectrum policy fields, as well as former senior members of the Commission, have publicly expressed views indicating that the absence of satellite technology in future telecommunications developments on the islands would ignore nearly five decades of technological advancements and in fact, invest hundreds of millions of dollars in a communications systems that would leave the residents of these islands left behind in a tremendous digital divide.

FCC Chairman Ajit Pai himself recently declared in an interview on WKAQ580 radio while in Puerto Rico, that the FCC’s intention was to “put Puerto Rico squarely on the map when it comes to digital innovation”. To achieve what Chairman Pai has declared, satellite technology must be a priority for new communication systems. To exclude satellite technology from inclusion in the **Uniendo a Puerto Rico Fund** would be a grave oversight.

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 jlrodriguez@camporicogroup.com

Sincerely,

Jose L. Rodriguez
CRG Communications/
Campo Rico Group, Inc

