

**PUERTO RICAN CULTURAL FESTIVAL & PARADE OF RI, INC.**

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Federal Communications Commission

445 12th Street SW.

Washington, DC 20554

July 26, 2018

Re: WC Docket Nos. 18-143, 10-90 and 14-58

**Proposed Rule** by **FCC** on **06/13/2018** **ID:** FCC-2018-0212-0002

<https://www.fcc.gov/ecfs/filings>

To: Federal Communications Commission,

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

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. However, the proposed rules for the distribution and implementation of the funds are woefully misguided.

It is 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 in order to build a truly resilient and connected Puerto Rico.

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.

Satellite technology is currently being utilized with great success across the continental United States, even made available through FCC subsidies to the most remove and un-serviced locations. Advances in technology now offer next-generation satellite system that have the ability to provide Puerto Rico with the latest technology and ever-increasing broadband speeds.

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 fact of future natural disasters

As storms increase in frequency and strength, it is imperative that Puerto Rico rebuild its demolished infrastructure to withstand the next hurricane season. Terrestrial communication cannot be relied upon, as we have already learned. As you know, 86% of all cell phone towers were put out of service due to the hurricane. Puerto Rico suffered $1.5 billion in damages to our communications network – leaving us stranded and without hope for supplies or assistance. The only system that worked was satellite broadband. In fact, even **FEMA relied on this system and supplied Puerto Ricans with satellite phones**.

After experiencing the trauma that resulted from being isolated with no communication post-Hurricane Maria, we are committed to making satellite broadband a reality and accessible throughout Puerto Rico. Working with telecom industry leaders, we are collaborating in the newly formed **Centros de Preparacion y Respuesta (CPR)**, a satellite connected network of member organizations across Puerto Rico. Through CPR, organizations such as ours will have a reliable communications system to ensure the residents the communities we serve will remain connected to each other, to emergency services, to community organizations such as schools, hospitals, fire departments, government and more – regardless of storm or emergency severity. This will ensure that communities across the island, no matter how remote, 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 functioned through the devastation and has the knowledge of what our citizens need, I hope you will take seriously our call for investments in satellite broadband technology. If we are to, as Chairman Pai said, “put Puerto Rico squarely on the map when it comes to digital innovation,” satellite broadband technology must be included in the FCC funding strategy in order to ensure Puerto Rico is never again muted during catastrophe.

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 Carmen Bucholz 401-347-5784.

Sincerely,

Carmen Bucholz

Puerto Rican Cultural Festival & Parade of Rhode Island