

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
The Uniendo a Puerto Rico Fund and the	)	WC Docket No. 18-143
Connect USVI Fund	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
ETC annual Reports and Certifications	)	WC Docket No. 14-58

**REPLY COMMENTS OF  
WORLDNET TELECOMMUNICATIONS, INC.**

WorldNet Telecommunications, Inc. (“WorldNet”) submits the following reply comments in response to the Commission’s Notice of Proposed Rulemaking issued in this proceeding on May 29, 2018. WorldNet, again, thanks the Commission for this opportunity to be a part of the process to bring much needed additional funding to Puerto Rico to update, expand, and solidify the communications infrastructure serving embattled and resilient citizens of Puerto Rico.

**REPLY COMMENTS**

In the initial comments filed in this proceeding, various commenters recommended rules and procedures for the second stage of funding for the Uniendo a Puerto Rico Fund that would effectively restrict the grant of second stage funding to, in the extreme, the ILEC alone and, in any event, to just a handful of select large service providers, proposals that are not fair or reasonable and not in the best interest of Puerto Rico. More specifically, these proposals include a right-of-first refusal for all second stage funding for the ILEC, restricting funding eligibility to residential service providers, and restricting funding opportunities to large geographic areas – all proposals that would extremely limit and/or preclude a number of existing Puerto Rico telecommunications providers from serving customers and playing a role in the rebuilding of Puerto Rico with second

stage funding. WorldNet strongly opposes these proposals as being unfair to providers like WorldNet and impeding the development of a strong telecommunications recovery in Puerto Rico.

In its Notice of Proposed Rulemaking, the Commission proposes to establish a second stage of funding for the Uniendo a Puerto Rico Fund that would make available, over a ten-year period, about \$699 million to Puerto Rico providers for rebuilding and expansion of Puerto Rico communications networks. The Notice also solicits comments on the process for awarding funding in the second stage.

As WorldNet expressed in its initial comments in this proceeding, the Commission should adopt a process that enables competitive providers, like WorldNet, to have a real and material role in the rebuilding process for Puerto Rico. After all, competitive providers like WorldNet have already played a real and material role in advancing critical restoration and recovery of telecommunications services in the immediate aftermath of Hurricane Maria, including among other things to hospitals, fire departments, and security agencies. In other words, the second stage should not just be the “incumbent LEC rebuilds Puerto Rico” stage. Single provider market dominance has historically resulted in Puerto Rico being behind in terms of service, costs, and technology and innovation. Nor should the second stage be used just to benefit the largest players in the telecommunications markets – i.e., those with market presences significant enough to tackle deployments to large geographic areas. There is value in including smaller providers, like WorldNet, with less expansive, more targeted service footprints, but which have and create other value through agility, flexibility, and a partnership approach to customers – particularly when those footprints are focused, in many instances, on the business and commercial centers of the island that are the engine that will drive Puerto Rico’s much needed economic recovery.

WorldNet has become an integral part of Puerto Rico communications markets, providing innovative, state-of-the-art service options to Puerto Rico business that are vital to the long-term success and prosperity of all Puerto Ricans. The competitive options and innovation that WorldNet (and others like it) now provide and, with realistic and fair access to Uniendo a Puerto Rico Fund funding, could provide to Puerto Rico consumers can and should be an equally integral part of Puerto Rico's future. To this end, as set forth in WorldNet's initial comments, WorldNet encourages the Commission to establish a second stage funding process that includes and creates a level playing field for competitive providers, like WorldNet.

Moreover, while WorldNet is not currently active in residential markets, WorldNet is open to serving residential customers and is already moving toward that end through exciting, innovative programs to bring advanced broadband services to residential customers in, among other things, real estate developments. WorldNet is also looking to expand to serve rural customers. In any event, excluding services to business customers from the equation would mean leaving out the segment that may end up being the most critical to the island's overall future recovery, that is, business, and, the economy. Such a process should not establish that funding decisions be made based solely on criteria in which larger, more ubiquitous providers, like PRTC and AT&T have an inherent advantage over smaller, more focused providers like WorldNet (e.g., the advantages of economies of scale, larger resources, greater reach into or on underserved areas, etc.). Rather, the Commission should also consider things like the importance of facilitating and growing competitive options, the importance of equipping the life-blood of Puerto Rico's economy (i.e., businesses) with innovative, tailored services and service options (including new service tools like cloud and IT options such as hosted telephony, virtual servers, analytics, and equipment), and the now well-apparent need to have network redundancy options. Put differently, the

Commission's funding decisions, by whatever process the Commission chooses to establish, should be focused not just on re-building and expanding physical networks, but on fostering a diverse, competitive market place in the areas of Puerto Rico that will most contribute to Puerto Rico's long term recovery, growth, and transformation into a place where Puerto Rican's have the same communication security, reliability, and options as those now enjoyed by all other US citizens.

Respectfully submitted,

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