

November 25, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: Puerto Rico Telephone Company, Inc. Public Notice of Copper Retirement under Rule 51.333

Dear Ms. Dortch:

Pursuant to Section 51.333 of the Commission's rules, 47 C.F.R. § 51.333, Puerto Rico Telephone Company, Inc. d/b/a Claro ("PRTC") hereby submits the attached Certification of Public Notice of Copper Retirement under Rule 51.333 and the attached Certification of Public Notice of Network Change Under Rule 51.329(a). As set forth in the attached documents, PRTC provided notice of the retirement of its copper distribution and copper loop facilities in certain areas of Puerto Rico and their replacement with fiber-to-the-premises facilities.

Please contact me if you need any further information.

Sincerely,

/s/ Eduardo R. Guzmán
Eduardo R. Guzmán
Squire Patton Boggs (US) LLP
2550 M Street, N.W.
Washington, DC 20037
(202) 457-6412
eduardo.guzman@squirepb.com

Counsel to Puerto Rico Telephone Company, Inc.

**CERTIFICATION OF PUBLIC NOTICE OF COPPER RETIREMENT
UNDER RULE 51.333**

I, Mónica Echevarría García, do hereby certify under Rule 51.333 that on November 12, 2019, I caused a copy of the Public Notice of Copper Retirement that is attached as Exhibit 1 to this Certification to be served via U.S. Mail (and, on the following day, by electronic mail) to the local exchange carriers that directly interconnect with Puerto Rico Telephone Company, Inc. (PRTC). The list of these local exchange carriers is attached as Exhibit 2 to this Certification. A copy of the Public Notice of Copper Retirement also may be found in PRTC's website: <https://www.claropr.com/personas/legal-regulatorio/>



Mónica Echevarría García
Puerto Rico Telephone Company, Inc.
1515 Roosevelt Avenue
10th Floor
Guaynabo, PR
(787) 782-9046

Enclosure:

Exhibit 1: Public Notice of Copper Retirement under Rule 51.333

Exhibit 2: Distribution list of Public Notice of Copper Retirement under Rule 51.333

EXHIBIT 1

PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.333

November 8, 2019

Carrier: Puerto Rico Telephone Company, Inc. d/b/a Claro PR (“PRTC”)

Contact: For additional information on these copper retirements, please contact:

Mario Barrera
Chief Operations Officer
1500 Roosevelt Avenue
Guaynabo, PR 00920
(787) 749-2087

Implementation Date: On or after March 2nd, 2020.

Locations: The planned copper retirements will take place at certain locations served by the central offices identified below and identified by Common Language Location Identifier Code (“CLLI”) in the table below.

| Municipality | Central Office | CLLI |
|---------------------|--------------------------------------|-------------|
| Arecibo | Arecibo AR CO DMS 100 | ARBOPRCO |
| Arecibo | Dominguito OPM | DMGTPRAB |
| Arecibo | Santana AR | SNTNPRRR |
| Bayamon | Bayamon Norte I CO DMS 100 | BYMNPRCO |
| Bayamon | Candelaria TB (Covadonga I) | CDTBPRCG |
| Bayamon | Minillas BY (Santa Juanita I) | MNBYPRJT |
| Bayamon | Pajaros BY CO ATT 5ESS (Bayamon Sur) | PJBYPRCO |
| Carolina | Cangrejo Arriba CN (Isla Verde I) | CNGJPRIV |
| Catano | Catano CT II | CTANPRUR |
| Catano | Almacen Bo. Palmas | PLCTPRRR |
| Coamo | Coamo CM | COMOPRUR |
| Guaynabo | Guaynabo GN CO SIEMENS DE5.2 | GUYNPRCO |
| Guaynabo | Pueblo Viejo GN CO DMS 100 | PBVJPRCO |
| Hatillo | Arecibo AR CO DMS 100 | ARBOPRCO |
| Hatillo | Carrizales OPM | CRZSPRUO |
| Mayaguez | Guanajibo MY (Zona Libre) | GJMYPRZL |
| Mayaguez | Mayaguez MY CO DMS 100 | MYGZPRCO |
| Ponce | Magueyes PC (Las Delicias) | MGPCPRLD |
| San Juan | Pueblo Viejo GN CO DMS 100 | PBVJPRCO |
| Toa Alta | Candelaria TB (Covadonga I) | CDTBPRCG |
| Toa Alta | Pajaros BY CO ATT 5ESS (Bayamon Sur) | PJBYPRCO |
| Toa Baja | Candelaria TB (Covadonga I) | CDTBPRCG |

The specific locations impacted by the copper retirements are identified in Exhibits A and B, which may be viewed on PRTC's website at <https://www.claropr.com/personas/legal-regulatorio/exhibits>. Exhibit A sets forth the addresses for the specific locations impacted by the copper retirement. Exhibit B identifies certain locations, mostly in rural areas of Puerto Rico, where the physical address information in PRTC's possession is either incomplete or unreliable. For these locations, PRTC is setting for the specific coordinates for the location of the copper facilities that will be retired.

Description of the planned network change: PRTC intends to retire copper distribution and copper loop facilities at the locations identified in Exhibits A and B. PRTC has deployed or plans to deploy fiber-to-the-premise as a replacement for these copper facilities in the locations identified in the Exhibits and intends to provide telecommunications and other services over these fiber facilities. PRTC also notes that all but one of these locations had been previously identified by PRTC as areas that were affected by Hurricanes Irma and Maria and, as such, were covered by the temporary authorization for emergency discontinuance of service that PRTC requested on August 3, 2018.¹ The retirement of the copper facilities and their replacement with fiber-to-the-premise will allow PRTC to restore telecommunications services in these affected areas

Description of reasonably foreseeable impact of the planned changes: After the copper facilities identified in Exhibits A and B are retired, PRTC will cease to maintain and will not offer services over them. The majority of customers currently served by copper facilities at these locations purchase "plain old telephone service" (POTS) from PRTC. After the transition to fiber, PRTC will continue to offer these customers the same POTS service over fiber at the same price that it was offered prior to the transition to fiber. Certain telecommunications services that PRTC currently offers via the copper facilities may be incompatible with fiber, however. In those instances, PRTC will work with the affected consumers and/or interconnected entities to offer alternatives, and it will comply with the requirements of section 63.71 of the Commission's rules to the extent that the services are discontinued. Any fiber-based alternative services offered to consumers and/or interconnected will be subject to the rates, terms and conditions set forth in the applicable tariff or agreement under which the service is offered. PRTC also notes that, for a number of customers in these locations, the deployment of fiber-to-the-premises will result in the restoration of the POTS service that had been temporarily discontinued under section 63.63 of the Commission's rules due to the impact of Hurricanes Irma and María.

¹ See Application for Authority for Emergency Discontinuance of Service on a Temporary Basis, *Application of Puerto Rico Telephone Company, Inc. d/b/a Claro Pursuant to 47 C.F.R. § 63.63 for the Emergency Discontinuance and/or Impairment of Service*, WC Docket No. 18-240 (filed Aug. 3, 2018). The network node identified as 15000IP100 is the only location identified in Exhibits 1 and 2 that previously had not been identified as an affected area for purposes of the temporary authorization under section 63.63 of the Commission's rules.

EXHIBIT 2

DISTRIBUTION LIST
PUERTO RICO TELEPHONE COMPANY, INC. PUBLIC NOTICE OF COPPER
RETIREMENT UNDER RULE 51.333

Optivon Telecommunications Services, Inc.,

Luis E. Romero, President
Tres Ríos Building, Suite 100, 27
González Giusti Avenue,
Guaynabo, P.R. 00968

Liberty Cablevision of Puerto Rico, LLC

John F. Conrad, Esq.
Director, Legal and Regulatory Affairs
P.O. Box 719
Luquillo, PR 00773

AT&T

Ms. Victoria Wright
Director, Access Management
One AT&T Way
Room 2A115
Bedminster, NJ 07921

IP Solutions, Inc.

Jorge Coreano, President
PO Box 361708
San Juan, PR 00936

Cortelco Systems Puerto Rico, Inc.

Juan Carlos Ramos, President
PO Box 7076,
Caguas, PR 00726

**Telefónica Larga Distancia De Puerto Rico,
Inc.**

Alberto González
Country Manager
Ave. Roosevelt 1502
San Juan, Puerto Rico

Verizon Communications

Mr. Dan Higgins
Verizon Partner Solutions
1 Verizon Way, Floor 02 Room VC22E009
Basking Ridge, NJ 07920

Data Access

Edward Amador
CFO
316 Ave. De La Constitución
San Juan PR 00936

Level 3 Communications, LLC

Attn: Genera Counsel – Regulatory
1025 Eldorado Blvd.
Broomfield, CO 80021

WorldNet Telecommunications, Inc.

Mr. David L. Bogaty, President
Plaza Caparra Avenue
F.D. Roosevelt, Suite 204
San Juan, PR 00922

CenturyLink Communications LLC

Gary Black
VP Carrier Relations
1025 Eldorado Blvd.
Broomfield CO 80021

**CERTIFICATION OF PUBLIC NOTICE OF NETWORK CHANGE
UNDER RULE 51.329(a)**

On November 12, 2019, the following Public Notice of Network Change was made by Puerto Rico Telephone Company, Inc. d/b/a Claro ("PRTC") pursuant to 47 C.F.R. §§ 51.325-51.335.

The Public Notice may be viewed on PRTC's website at:
<https://www.claropr.com/personas/legal-regulatorio/>

Title of Network Notification:

Copper Retirement 2019-0001



Mónica Echevarría García
Puerto Rico Telephone Company, Inc.
1515 Roosevelt Avenue
10th Floor
Guaynabo, PR
(787) 782-9046

Dated: November 21, 2019