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November 30, 2018

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

**Re: Notice of *Ex Parte*
Connect America Fund, WC Docket No. 10-90
Hurricane Response, PS Docket No. 17-344**

Dear Ms. Dortch:

On November 28th and 29th, Sandra Torres, President of the Telecommunications Regulatory Board of Puerto Rico (“Board”), Frances Rodriguez and Katherine Erazo Board Advisors, and Douglas Meredith, Economic Advisor to the Board (collectively, “Board Representatives”), met separately with Commissioner Jessica Rosenworcel and Travis Litman of Commissioner Rosenworcel’s office, Commissioner Brendan Carr and Jamie Susskind of Commissioner Carr’s office, and with Arielle Roth and Kagen Despain of Commissioner O’Rielly’s office. The Board Representatives also met together with Chairman Pai, Michael Carowitz and Preston Wise of the Chairman’s office, Debra Jordan and Roberto Mussenden of Public Safety and Homeland Security Bureau, Sue McNeil and Justin Faulb of the Wireline Competition Bureau, and Charles Mathias and Aalok Mehta of the Wireless Telecommunications Bureau.

In each meeting the Board Representatives shared the attached information on restoring and advancing Puerto Rico communications networks in the wake of the devastating damage caused by hurricanes Irma and Maria in the 2017 hurricane season.

The Board Representatives thanked the Federal Communications Commission (“FCC”) for its support to restore basic infrastructure and services to end-user customers. The discussion also addressed Stage Two of the Uniendo a Puerto Rico Fund comments and reply comments. The Board Representatives offered the FCC on-the-ground observations and made recommendations in several key funding areas.

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Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Douglas Meredith

Douglas Meredith
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cc: Chairman Ajit V. Pai
Commissioner Carr
Commissioner Rosenworcel
Michael Carowitz, Special Counsel, Office of Chairman Pai
Preston Wise, Acting Special Counsel, Office of Chairman Pai
Arielle Roth, Wireline Legal Advisor, Office of Commissioner O'Rielly
Kagen Despain, Legal Intern, Office of Commissioner O'Rielly
Jamie Susskind, Chief of Staff, Office of Commissioner Carr
Travis Litman, Chief of Staff, Office of Commissioner Rosenworcel
Debra Jordan, Public Safety and Homeland Security Bureau
Roberto Mussenden, Public Safety and Homeland Security Bureau
Sue McNeil, Wireline Competition Bureau
Justin Faulb, Wireline Competition Bureau
Charles Mathias, Wireless Telecommunications Bureau
Aalok Mehta, Wireless Telecommunications Bureau

Attachment



Uniendo a Puerto Rico Fund: Stage Two

La Junta de Reguladora de Telecomunicaciones de Puerto Rico
at the Federal Communications Commission
Washington, DC
November 28-29, 2018

Mission of the Board

- Promote fair and equitable **competition** among the companies that offer telecommunications and cable television services, to guarantee to all the citizens of Puerto Rico the **availability** and enjoyment of said services at a reasonable cost; promote and foster the **economic development** of the Commonwealth and guarantee telecommunications and cable television services of the highest **quality**

Post-Maria Operations

- Mobile Services
 - Most towers and cell sites are operational
 - Diesel generators and battery backup are on standby
- Wireline Services
 - Operations are largely operational
 - Recovery in central portion of island continues
- Power Services
 - Operations are fragile
 - Rolling brown-outs still common

Uniendo a Puerto Rico

- Board is pleased to participate in WC Docket No. 18-143, *The Uniendo a Puerto Rico Fund and the Connect USVI Fund*
- Board comments provided in July
 - Funding level
 - Request rather than auction
 - Municipios as geographic areas (concerns in auction)
 - Performance criteria
 - Hardening assets and redundancy

Discussion Topics

- Carrier eligibility
 - Offering service prior to Hurricane
 - Should residential service be required to qualify?
 - Benefits to having as many carriers participate outweigh a residential only requirement
 - PRTC's proposed right of first refusal limits the ability of other carriers to participate

Discussion Topics

- Funding
 - Board recommends the FCC revisit the current budget
 - Current round of funding appears to be lower than what will be needed to restore, advance, and harden critical infrastructure
 - Benefits in providing adequate support in one step rather than two
 - Benefits in providing wireline and wireless support separately to advance and harden infrastructure

Discussion Topics

- Geographic areas
 - Municipality requirements
 - Need to address municipality as well as contiguous areas within a municipality (such as Census Block Groups or Tracks)
 - Benefit to have smaller areas in some municipalities
 - Claims of achieving scale economies need to be balanced with carriers' ability to cover entire municipalities
- Locations and Carrier Commitment
 - Use carrier of last resort duty in a defined geographic area appears better suited to Puerto Rico than number of locations ready to serve

Discussion Topics

- Advancing Service
 - In addition to restoration, advancement into areas without service or without adequate service should receive priority in the RFP process
 - Example: rural municipalities and rural areas within more populated municipalities should receive priority
- Service Commitment
 - Benefits to having higher broadband capacity/speed for service commitment
 - Benefits for 25/3Mbps service for residential service
 - Benefits for having higher service commitment for business locations
 - Voice service would be adjunct to this broadband service level

Discussion Topics

- Competitive geographic areas
 - Restoration and hardening is needed for all of Puerto Rico
 - Advancement in competitive areas is already covered by large competitors in market
 - Benefits to limiting the ability to spend support funds in competitive areas for advancement
 - Better deployment of support funds in non-competitive areas
 - Census block limitations within a municipality may be cumbersome but necessary

Thank You

President Sandra Torres: storres@jrtp.pr.gov

Douglas Meredith, Economic Advisor: dm@jsi.net