

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

In the Matter of	)	
	)	
Copper Retirement Network Change	)	WC Docket No. 18-141
Notification Filed by Puerto Rico	)	
Telephone Company, Inc. d/b/a	)	
Claro PR	)	

**RESPONSE OF  
WORLDNET TELECOMMUNICATIONS, INC.**

WorldNet Telecommunications, Inc. (“WorldNet”) hereby responds to the copper retirement (“PRTC Proposed Retirement”) that is the subject of the copper retirement network change notification by the Puerto Rico Telephone Company, Inc. (“PRTC”) in the docket referenced above (“PRTC Notice”). WorldNet is a telecommunications service provider that directly interconnects with PRTC’s network and leases unbundled network elements (“UNEs”) from PRTC. As such, WorldNet’s responses are properly submitted pursuant to 47 C.F.R. § 51.333(c).

**RESPONSE**

**1. Reason(s) why WorldNet cannot accommodate the PRTC Proposed Retirement by February 13, 2018, the date stated in the PRTC Notice.**

WorldNet cannot accommodate the PRTC Proposed Retirement because, as a threshold matter, PRTC has not provided information sufficient to identify whether and how the PRTC Proposed Retirement affects PRTC loop facilities currently leased by WorldNet as UNEs.

The PRTC Notice indicates that PRTC intends to retire copper distribution and copper loop facilities served by five (5) PRTC central offices, with the specific facilities identified by PRTC “IP” numbers. While WorldNet can discern that the intended retirement will affect loops served by PRTC central offices where WorldNet currently leases UNE loops from PRTC, WorldNet has

no way to determine which loops within those PRTC central offices will be affected. This is because the PRTC “IP” number that PRTC provides to indicate the specific locations impacted by PRTC’s planned copper retirements appears to be an internal PRTC facilities designator that leaves WorldNet unable to fully know which, if any, of the copper loops that WorldNet now leases from PRTC as UNEs out of the five (5) identified PRTC central offices will be impacted by PRTC’s planned retirement.

In order for WorldNet to even begin the process of evaluating the extent of PRTC’s Proposed Retirement, PRTC must provide WorldNet a listing of the specific UNE loops currently leased by WorldNet that will be impacted by the PRTC proposed copper retirement using facility identifiers that will enable WorldNet to readily know exactly which UNE loops/WorldNet customers will be impacted. Moreover, PRTC must also share with WorldNet the full scope of PRTC’s intended retirement for each affected UNE loop (*e.g.*, the exact portion of the loop being retired), as well as PRTC’s proposed arrangements for facility/service transition (*e.g.*, to alternate facilities provided by WorldNet, to bandwidth leased by WorldNet on the PRTC replacement fiber,<sup>1</sup> or to another service provider).

## **2. Steps WorldNet is taking to accommodate the PRTC Proposed Retirement on an expedited basis.**

Upon receiving the PRTC Notice, WorldNet promptly contacted PRTC representatives, requesting PRTC to specifically identify affected UNE loops currently leased by WorldNet. While WorldNet is informed that PRTC is working on the matter, to date, WorldNet has not received the requested identification. Without this identification, WorldNet is not yet able to ascertain the scope and scale of what PRTC has proposed or exactly what WorldNet can or must

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<sup>1</sup> PRTC is currently still under an obligation pursuant to its current interconnection agreement with WorldNet to provide to WorldNet nondiscriminatory access to a 64 kbps transmission path capable of voice grade service on PRTC fiber facilities replacing retired copper.

do to accommodate the PRTC Proposed Retirement. Nevertheless, as a precautionary, stop-gap measure, WorldNet has proactively begun investigating its technical and operational options that may be available to it with regard to UNE loops served out of the five (5) PRTC central offices identified in the PRTC Notice.

**3. Earliest possible date by which WorldNet anticipates that it can accommodate the PRTC Proposed Retirement, assuming that it receives all needed information from PRTC.**

The earliest possible date by which WorldNet can accommodate the PRTC Proposed Retirement will depend on the extent WorldNet's UNE loop facilities will be impacted by PRTC's Proposed Retirement. Based on preliminary investigation, some WorldNet UNE loop customers served out of the five (5) PRTC central offices targeted by PRTC's Notice can be readily transitioned to alternate service arrangements by WorldNet within a matter of days or weeks. Other customers and/or locations, however, may justify and/or could require WorldNet fiber deployments that would require three (3) to six (6) months to complete. Moreover, to the extent that PRTC allows WorldNet to lease bandwidth on PRTC's replacement fiber, its ability to exercise that option will be dependent on the resources and equipment changes required of both parties to accommodate the new arrangement.

**4. Other information relevant to WorldNet's response.**

Without now knowing the full scope of the impact of the PRTC Proposed Retirement on WorldNet and its customers, WorldNet is precluded from now knowing whether there are further bases for responding to the PRTC Proposed Retirement. To this end, WorldNet respectfully reserves its right to supplement and/or provide further response to the PRTC Proposed Retirement as and to the extent that WorldNet learns the full scope of the impact of the PRTC Proposed Retirement on WorldNet and its customers.

Respectfully submitted,

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Filed: December 11, 2018

### AFFIDAVIT

I, Maria Virella, under oath and subject to penalty for perjury, certify that I have read this objection, that the statements contained in it are true, that there is good ground to support the objection, and that it is not interposed for purposes of delay. I have appropriate authority to make this certification on behalf of WorldNet Telecommunications, Inc., and I agree to provide any information the Commission may request to allow the Commission to evaluate the truthfulness and validity of the statements contained in this objection.”



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Maria Virella  
President  
WorldNet Telecommunications, Inc.