



December 19, 2017

**Alvaro Pilar**  
Chief Executive Officer  
4611 Tutu Park  
St. Thomas, VI 00802

**Via ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

*Re: Request for Early Puerto Rico and U.S.V.I. Post-Auction TV Transition  
GN Docket No. 12-268; MB Docket No. 16-306*

Dear Ms. Dortch:

By this letter, Vitelcom Cellular, Inc. d/b/a Viya (“Viya”) expresses support for the request made by the licensees of twenty television broadcast stations in Puerto Rico and the U.S. Virgin Islands (the “PR/USVI Broadcasters”) for Commission authorization to accelerate their transitions to their post-auction TV channel assignments.<sup>1</sup> Viya and its affiliates (formerly Innovative and Choice Wireless) provide voice, wireless, video, data and enterprise services throughout the U.S. Virgin Islands. One such affiliate, SAL Spectrum, LLC, is the licensee of 40 megahertz of 600 MHz Band spectrum in the U.S. Virgin Islands that it acquired in the recent incentive auction.

The Commission knows all too well the devastating impact that Hurricanes Irma and Maria have had on these U.S. territories, with broadcast and telecommunications facilities destroyed and electric power knocked out. The PR/USVI Broadcasters have presented a compelling case for revision of the Post-Auction Broadcast Transition phase assignments to specify pre-Phase 1 transitions for their stations. As the PR/USVI

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<sup>1</sup> See Letter to Marlene H. Dortch (FCC Secretary) from Francisco R. Montero, Esq., et al. (filed Nov. 14, 2017 in the above-referenced dockets (16 stations)); see also Letter to Marlene H. Dortch (FCC Secretary) from Todd D. Gray (filed Dec. 1, 2017 in the above-referenced dockets (2 stations)), and Letter to Marlene H. Dortch (FCC Secretary) from Melodie A Virtue (filed Dec. 18, 2017 in the above-referenced dockets (2 stations)).

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Broadcasters have pointed out, grant of the requested early transition would allow them to efficiently couple available federal disaster relief with funding from the TV Broadcaster Relocation Fund, thereby avoiding duplicative efforts and facilitating the resumption of full broadcast operations in Puerto Rico and the U.S. Virgin Islands as soon as possible. It also would benefit the Commission's overall repacking plan by spreading out the workload for repacking vendors, enabling them to remain busy during the period prior to Phase 1 of the transition schedule.

In addition, favorable action on the PR/USVI Broadcasters' request would have the benefit of clearing essential portions of the 600 MHz Band sooner than otherwise would occur. Viya's network infrastructure in the U.S. Virgin Islands was decimated by Hurricanes Irma and Maria, and Viya is working hard to restore services to its customers. In addition to helping the residents of Puerto Rico and the U.S. Virgin Islands regain full access to television broadcast services, grant of the PR/USVI Broadcasters' request will enable Viya to put the 600 MHz spectrum to use as soon as possible as part of its service restoration efforts, benefitting wireless consumers by speeding the initiation of wireless broadband services using the new 600 MHz Band spectrum resources.<sup>2</sup> Though it is a small operation, Viya could assist the PR/USVI Broadcasters by offering technical and practical assistance in conjunction with our own efforts to restore Viya facilities.

For all these reasons, Viya fully supports the PR/USVI Broadcasters' request for early transition to their post-auction channel assignments, and urges the Commission to act favorably on that request as soon as is practicable.

Sincerely,

*/s/ Alvaro Pilar*

Alvaro Pilar  
Chief Executive Officer

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<sup>2</sup> This benefit also was cited by T-Mobile USA, Inc. in its letter supporting the PR/USVI Broadcasters' request. *See* Letter to Marlene H. Dortch (FCC Secretary) from Steven B. Sharkey (filed Nov. 21, 2017 in the above-referenced dockets).