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February 24, 2015

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VIA ECFS

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

Re: *Connect America Fund, WC Docket No. 10-90; Connect America Fund Phase I Round 2 Submission of Location Information and Clarification of Location Information Submission Requirements*

Dear Ms. Dortch:

Puerto Rico Telephone Company, Inc. (“PRT”) hereby files this letter (1) to submit, pursuant to the Wireline Competition Bureau’s (“Bureau”) request,¹ location information for each of the locations to be counted towards its Connect America Fund (“CAF”) Phase I Round 2 broadband deployment plan; and (2) to clarify that, consistent with the Commission’s May 22, 2013 Order in this proceeding (“*May 2013 Order*”),² a carrier must provide geocoded latitude and longitude information for each deployment location when it files its milestone certifications.

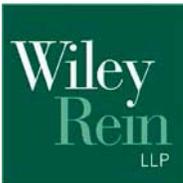
As requested by the Bureau,³ the attached file includes the following information for each of the locations to be counted towards PRT’s deployment obligation: (1) census block information based on the Federal Information Processing Standard (FIPS) code; PRT’s NECA-assigned operating company code (OCN); PRT’s study area code (SAC); and the wire center’s Common Language Location Identifier (CLLI) code.

Consistent with the Commission’s *May 2013 CAF Order*, PRT further requests that it be allowed to submit latitude and longitude information for each location to be counted towards its broadband deployment obligation when it files its two- and three-year milestone certifications rather than as part of this information submission. In the *May 2013 Order*, the Commission explained that recipients of

¹ *Wireline Competition Bureau Announces Deadlines for Connect America Phase I Round Two*, Public Notice, 29 FCC Rcd 11445 (Wireline Comp. Bur. 2014) (“*September 2014 PN*”).

² *Connect America Fund*, Report and Order, 28 FCC Rcd 7766 (2013) (“*May 2013 Order*”).

³ *See September 2014 PN*; 77 Fed. Reg. 26987, 26988 (May 8, 2012).



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Phase I support must provide geocoded latitude and longitude information in their two- and three-year certifications because “recipients should know by that point in time to which locations they are deploying in order to satisfy their buildout requirements.”⁴ The Commission concluded that “it is unlikely this additional reporting requirement will substantially burden Phase I recipients.”⁵ Accordingly, PRT plans to submit latitude and longitude information for each location to be counted towards its broadband deployment obligation with its milestone certifications.

Please contact me should you have any questions about this filing.

Best regards,

/s/ Thomas J. Navin
Thomas J. Navin

Attachment

cc: Carol Matthey
Ryan Palmer
Alex Minard

⁴ *May 2013 Order* ¶ 35.

⁵ *Id.* To the extent that the Bureau has a contrary interpretation of the requirement to file this information, PRT requests a waiver of the February 24 deadline pursuant to 47 C.F.R. § 1.3. *See also Wait Radio v. F.C.C.*, 418 F.2d 1153, 1159 (D.C. Cir. 1969) (holding that the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis). The February 24 deadline creates a financial burden on PRT to collect this data in advance of the Commission-imposed deadline.