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November 17, 2015

FCC Mail Room

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204

Re: Rural Call Completion Reporting
WC Docket No. 13-39

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Dear Ms. Dortch,

The purpose of this letter is to report to the FCC that Optivon, Inc. is not required to record, retain and submit reports as described in the FCC Rural Call Completion Order. We make this certification based on the applicability instructions described in Section I-Background, paragraph 5. We support this decision based on the following:

1. Optivon provides Long Distance (LD) to less than 1,000 direct customers. The requirement is to have a minimum of 100,000 subscribers.
2. Optivon does not make the initial long-distance path choice for the LD traffic it handles as a LD provider to LD customers in Puerto Rico. The first path decision is being made by the originating service provider, our customers, as Optivon is only one of various choices they have to send the LD calls.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Rafael Morales
VP Network Services

Tel: (787) 625-2720

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