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August 24, 2006

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 06-113 (Verizon sale of PRTC to América Móvil)

Dear Ms. Dortch:

The purpose of this letter is to provide some additional information for the record of this proceeding.

This matter concerns a request by Verizon Communications, Inc. (“Verizon”) and América Móvil, S.A. de C.V. (“América Móvil”) to permit the sale of the Puerto Rico Telephone Company, Inc. (“PRTC”) from Verizon to América Móvil. Centennial Communications Corp. (“Centennial”) has filed a petition to deny approval of the transaction, at least in the absence of certain reasonable conditions designed to ensure that PRTC’s performance of its obligations as a domestic United States incumbent local exchange carrier (“ILEC”) does not degrade when the company is in the hands of a Mexican firm with no experience as a domestic ILEC and scant experience or interest in United States landline, as opposed to wireless, operations.

One of Centennial’s concerns is that under new ownership – or, indeed, in anticipation of new ownership – PRTC will simply devote less time and attention to fulfilling its obligations as an ILEC than is necessary. Centennial explained that a change in PRTC’s corporate culture is a predictable and inevitable result of the change in its ownership from Verizon – one of the largest U.S. ILECs – to América Móvil. The purpose of this letter is to bring to the Commission’s attention a recent development in Puerto Rico that illustrates this problem, and to reiterate the importance of imposing the conditions on the transaction that Centennial has proposed.

A recent network outage in Puerto Rico illustrates the critical importance of PRTC actively fulfilling its obligations under the Telecommunications Act of 1996. As noted in Centennial’s earlier filings in this matter, Centennial competes with PRTC in the provision of both traditional landline telephone service and wireless service. Centennial is a full facilities-based competitor; except in extremely limited circumstances, Centennial does not rely on PRTC “unbundled network elements” to serve its customers. Instead, Centennial has invested millions

Ms. Marlene H. Dortch
August 24, 2006
Page 2

of dollars to establish direct, physical “meet point” interconnections at all of PRTC’s host end offices throughout Puerto Rico. In addition, Centennial maintains meet points at both of PRTC’s tandem switches in San Juan. *See* Centennial Communications Corp. Petition to Deny (“Petition”) (July 14, 2006) at 8-9.

Centennial prefers to rely on its direct end office meet points to exchange traffic with PRTC. A key function of the tandem switch meet points, however, is to provide a back-up route in case of some technical problem at one of the end office meet points. On Monday, August 14, just such a technical problem occurred when a third-party utility (the Puerto Rico Power Authority) inadvertently severed the fiber optic link between Centennial’s network and PRTC’s end office in Mayagüez, in far western Puerto Rico.

The interconnection agreement between PRTC and Centennial plainly and directly requires PRTC to program its switches to automatically re-route traffic to its tandem switches in such a situation. PRTC, however, had not done so – with the predictable result that hundreds if not thousands of calls to Centennial’s landline and wireless customers were blocked.

When Centennial protested to PRTC, its response – initially from middle managers, but confirmed by PRTC’s upper management, including its President – was to demand that Centennial concede its position in a variety of unrelated billing disputes with PRTC that were separately subject to ongoing negotiations. It took Centennial about 12 hours to repair the fiber cut, during which time, as noted, the calls simply did not go through. Only after Centennial escalated the problem by filing an emergency pleading with the Puerto Rico regulatory authorities did PRTC grudgingly acknowledge that it had not fulfilled its contractual obligations. More than a week later, PRTC – in order to avoid going ahead with the case before the Puerto Rico regulatory authorities – asserted that it had established the required automatic re-routing capability. Centennial is in the process of conducting tests to see if this assertion is actually true.

These events perfectly illustrate why Centennial’s proposed conditions on the acquisition of PRTC by América Móvil are necessary. Establishing automatic re-routing of traffic via tandem switches to ensure that calls go through – that is, to ensure that the public is served – is neither difficult or costly. It does, however, require that PRTC ***actually pay attention to its legal obligations to its competitors***. As Centennial explained in its earlier filings, once América Móvil takes over, PRTC will undergo a radical shift in corporate culture ***away from*** whatever minimal level of attentiveness it has been able to muster in the past. *See* Petition at 4-12; Centennial Communications Corp. Reply to Opposition to Petition to Deny (July 28, 2006) at 6-9. In other words, there is every reason to believe that, in the absence of corrective conditions on the transaction, once América Móvil takes over, problems of the sort Centennial had to endure last week will become more likely and more frequent.

Centennial has specifically proposed that the new owners of PRTC be called upon to fund an outside monitor to provide semi-annual reports on PRTC’s compliance with its obligations under the Telecommunications Act of 1996, precisely to force PRTC to pay adequate attention to

Ms. Marlene H. Dortch

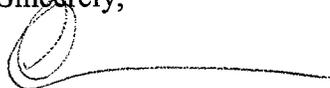
August 24, 2006

Page 3

those obligations. Last weeks' events show that Centennial's proposed condition is both prudent and necessary.

Please contact the undersigned if you have any questions about this matter.

Sincerely,



Christopher W. Savage

Counsel for

CENTENNIAL COMMUNICATIONS CORP.

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