



September 1, 2006

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Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: In re Applications of Verizon Communications Inc. and América Móvil, S.A. de C.V. for Transfer of Control of FCC Licenses and Authorizations Held by Telecomunicaciones de Puerto Rico, Inc., WT Docket No. 06-113

Dear Ms. Dortch:

This letter responds to Centennial Communications Corp.'s ("Centennial") August 24, 2006 submission in the above-referenced docket. As with many of the issues raised in Centennial's prior pleadings in this docket, the network outage problem Centennial identifies is clearly not related to the pending transfer of control and thus not relevant to the Commission's consideration of the proposed transaction. The issue is currently pending in, and more properly addressed by, other fora.

Centennial's filing describes the severing (by an unrelated third party) of a fiber optic link between Centennial's network and a Puerto Rico Telephone Company ("PRTC") end office and the failure of the traffic terminating on the Centennial network through that end office to be automatically re-routed to PRTC's tandem switch. Centennial acknowledges that it has been notified that the automatic re-routing capability has now been implemented by PRTC. Centennial also acknowledges that its complaint concerning this event is pending before the Telecommunications Regulatory Board of Puerto Rico ("TRB"). Nevertheless, Centennial argues that this incident warrants conditions on the proposed transferee.

The incident Centennial describes has nothing to do with the proposed transaction, which does not affect local wireline markets or TELPRI's obligations to comply with the Commission's market opening rules. As we have already explained,¹ the Commission has repeatedly held that non-transaction specific issues like this one are properly addressed in other fora, such as complaint

¹ See América Móvil's and Verizon's Opposition to Petitions to Deny, WT Docket No. 06-113, at 17-27.

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proceedings.² Centennial has already filed a complaint with the TRB. Centennial's complaint, and PRTC's motion to dismiss it, are currently being considered by the TRB.

Nor does the incident in any way suggest the likely future behavior of the proposed transferee, which is not currently involved in the operations of PRTC. Accordingly, the incident and Centennial's arguments are not related to the pending transfer of control and thus are not relevant to the Commission's consideration of the transaction under established precedents.³ Finally, the Commission should reject these arguments, as it has rejected similar arguments in the past, based wholly upon speculation that a party will not comply with its obligations in the future.⁴

For these reasons, the Commission should reject Centennial's request for conditions, as well those of the other petitioners, and grant the application to transfer control.

Respectfully submitted,



cc: Gail Cohen
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Christopher Savage, Counsel for Centennial Communications Corp.

² See, e.g., *Applications for Consent to the Assignment and/or Transfer of Control of Licenses Adelpia Communications Corporation to Time Warner Cable Inc. and Comcast*, 39 CR 1 FCC 06-105, ¶ 240 (2006) (“commenters have other, more appropriate, avenues for obtaining relief regarding these non-transaction specific issues.”).

³ See, e.g., *Verizon Communications Inc. and MCI, Inc. Applications for Approval of Transfer of Control*, Memorandum Opinion and Order, 20 FCC Rcd 18493, ¶ 191 (2005) (“*Verizon/MCI Order*”).

⁴ See, e.g., *Lockheed Martin Corp. Regulus, LLC and Comsat Corp.*, Memorandum, Order and Authorization, 14 FCC Rcd 15816, ¶ 37 (1999) (approving transfer of control and declining to speculate whether the combined entity would breach its future obligations); *accord Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, Order on Remand, 20 FCC Rcd 2533, ¶ 214, n. 580 (2005) (observing that the Commission will not impose obligations “on the basis of purely speculative concerns”).