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November 13, 2006

**VIA ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Application for Consent to the Transfer of Control of  
Telecommunications of Puerto Rico Inc. from Verizon to  
America Móvil (WT Docket No. 06-113)

Dear Ms. Dortch:

On November 13, 2006, President Miguel Reyes Davila, Ms. Haydee Reyes, Associate Member Vicente Aguirre Iturrino and Associate Member Nixyvette Santini Hernández of the Telecommunications Regulatory Board of Puerto Rico, accompanied by the undersigned, met with James Ball, David Strickland and Jodi Cooper of the International Bureau, Bill Dever and Gail Cohen of the Wireline Competition Bureau, and Ann Bushmiller and Neil Dellar of the Office of General Counsel to discuss the position of the Board regarding the above-captioned matter. The Members of the Board provided the attached documentation.

Please direct any questions to the undersigned.

Respectfully submitted,

Veronica M. Ahern

Enclosure:

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cc: James Ball  
David Strickland  
Jodi Cooper  
William Dever  
Gail Cohen  
Ann Bushmiller  
Neil Dellar



**Junta Reglamentadora  
de Telecomunicaciones  
de Puerto Rico**

**The Telecommunications Regulatory Board of Puerto Rico was created by the Puerto Rico Legislature in September 1996 to promote competition and safeguard the public interest.**

**The Board has undertaken major initiatives to promote competition and protect the consumer: a major proceeding to reduce intrastate access rates; fourteen interconnection arbitrations; forty interconnection agreement approvals.**

**But, while competition has increased and is clearly developing, improvement in quality of service is slow and telephone penetration averages only 60.9%.**

**The Board is extremely concerned that transfer of control of PRTC will have a serious negative impact on the promotion of competition and protection of the consumer.**

**America Móvil has given no credible assurance that it will improve quality of service for consumers and competitors.**

**Therefore the Board recommends adoption of Regulations for Quality Service Measurement and Reporting, developed by Telcordia Technologies and based on FCC, State and NARUC quality measurement programs. Any approval of the transfer of control of PRTC must be conditioned on these or similar performance measures. We also recommend that the Commission condition approval on a program of significant investment in expansion and improvement, over the next five years, of both the wireline and wireless networks.**

**Miguel Reyes Davila, President  
Vicente Aguirre Iturrino, Associate Member  
Nixyvette Santini Hernández, Associate Member**

**November 13, 2006**