

December 1, 2006

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Application for Consent to Transfer Control of Telecomunicaciones de Puerto Rico, Inc. from Verizon to América Móvil (WT Docket No. 06-113)

Dear Ms. Dortch:

In response to questions from Commission staff, América Móvil, S.A. de C.V. (“América Móvil”), by its undersigned counsel, provides clarification to the ownership information provided in a letter filed in this docket on November 1, 2006 (the “November 1 Letter”).¹ Specifically, Commission staff asked counsel to clarify whether the interests held by “Carlos Slim Helú and certain members of his immediate family” are all held by Mexican individuals or entities, and to clarify the percentage of América Móvil’s total capital stock represented by those shares held via ADSs (both L share and A share) by parties with registered addresses in the U.S.

In response to the first question: All the interests held by Mr. Carlos Slim Helú and certain members of his immediate family are held by Mexican individuals or entities.

In response to the second question: Using information reported in América Móvil’s June 30, 2006 Form 20-F filed with the Securities and Exchange Commission (the “20-F”), and cited in the November 1 Letter, we can provide the following approximations:

- According to the 20-F, there are 24.491 billion outstanding L shares, and 79.3 percent of the L shares are held via L share ADSs. This means that approximately 19.421 billion L shares are held via L share ADSs (79.3 percent of 24.491 billion). Also according to the 20-F, 1.37 percent of the L share ADSs are held by parties with registered addresses in the U.S. This means that approximately 266 million L shares are held via L share ADSs by parties with registered addresses in the U.S. (1.37 percent of

¹ Letter from Philip L. Verveer, Counsel to América Móvil, S.A. de C.V., to Ms. Marlene Dortch, Secretary Federal Communications Commission, WT Dkt. No. 06-113 (filed Nov. 1, 2006) (“November 1 Letter”).

19.421 billion). This means that approximately 1.09 percent (266 million of 24.491 billion) of the total L shares are held via L share ADSs by parties with registered addresses in the U.S. Finally, according to the 20-F, the L shares represent 67.74 percent of América Móvil's total capital stock. This means that 0.74 percent of América Móvil's total capital stock (1.09 percent of 67.74 percent) is held via L share ADSs by parties with registered addresses in the U.S.

- According to the 20-F, there are 752 million outstanding A shares, and 24.1 percent of the A shares are held in the form of A share ADSs. This means that approximately 181.23 million A shares are held via A share ADSs (24.1 percent of 752 million). Also according to the 20-F, 21.31 percent of the A share ADSs are held by parties with registered addresses in the U.S. This means that approximately 38.62 million of the A shares are held via A share ADSs by parties with registered addresses in the U.S. (21.31 percent of 181.23 million). This means that approximately 5.14 percent of the A shares are held via A share ADSs by parties with registered addresses in the U.S. (38.62 million of 752 million). Finally, according to the 20-F, the A shares represent 2.08 percent of América Móvil's total capital stock. This means that approximately 0.11 percent of América Móvil's total capital stock (5.14 percent of 2.08 percent) is held via A share ADSs by parties with registered addresses in the U.S.

As the numbers used for these calculations were originally placed in the record in the November 1 Letter, they are all subject to the same caveats, qualifications, and effective dates that were stated in the November 1 Letter.

Finally, attached for your information is a copy of a press release issued by América Móvil on November 7, 2006, announcing that América Telecom, S.A. de C.V. ("América Telecom") will merge with América Móvil in the first quarter of 2007, such that the present owners of América Telecom will become direct owners of América Móvil. This merger will not involve a substantial change in control of América Móvil, and the announcement does not alter the present ownership structure of América Móvil as described in the Application and in subsequent submissions in this proceeding.

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Kindly direct any questions to the undersigned.

Respectfully submitted,

/s/ Daniel K. Alvarez
Daniel K. Alvarez
WILLKIE FARR & GALLAGHER LLP
1875 K Street, NW
Washington, DC 20006
202-303-1265
Counsel for América Móvil, S.A. de C.V.

Enclosure

cc: Ms. Susan O'Connell
Ms. Jodi Cooper



América Móvil to merge América Telecom

MEXICO CITY, Mexico, November 7, 2006 -- América Móvil, S.A. de C.V. (“**AMX**”) (BMV: AMX; NYSE: AMX; Nasdaq: AMOV; LATIBEX: XAMXL) today announced that it has commenced steps to merge with **America Telecom, S.A. de C.V.** (“**AMTEL**”). The merger will involve the exchange of 4.07128 AMX shares per each AMTEL share based on the asset value of AMTEL at the average price of AMX shares in the Mexican Stock Exchange over the five trading days ending November 6, less AMTEL’s net indebtedness.

AMTEL is a holding company with a controlling interest in AMX and its shares trade on the Mexican Stock Exchange. As of October 31, 2006, AMTEL held 14,630 million shares of AMX, representing 40.74% of the outstanding capital stock of AMX, including 7,587,453,264 “AA” shares and 7,042,546,736 “L” shares. Its net indebtedness was equivalent to approximately 1.28 billion dollars. Other than cash or equivalent investments, AMTEL’s only asset is AMX stock.

As a consequence of the proposed merger, AMX will cancel, on a net basis, approximately 600 million outstanding “L” shares and will assume AMTEL’s net indebtedness.

The merger will (i) lead to the elimination of the dual holding structure that currently exists; this will result in the concentration of all investment and strategic decisions concerning AMX’s business and operations at AMX corporate bodies where all shares are represented; (ii) increase by approximately 1.16 billion dollars the amount by which AMX may repurchase shares or distribute dividends without incurring additional taxes; (iii) result in the elimination of the corresponding management fee; and (iv) increase the float of AMX shares, as the number of AMX shares previously held by AMTEL—other than the controlling shares—will go back into circulation (except for the approximately 600 million “L” shares that will be canceled).

The merger announced herein is subject to approval by the Shareholders’ Meetings of each of AMX and AMTEL, governmental approvals and other customary conditions. Credit Suisse Securities USA LLC (“**Credit Suisse**”) has acted as financial advisor to AMX in connection with the proposed exchange ratio for the merger. If approved, the merger will be consummated during the first quarter of 2007.

This press release is not an offer of securities for sale in the United States. Securities may not be offered or sold in the United States absent registration or an exemption from registration. Any public offering of securities in the United States, if any, will be made by means of a prospectus that may be obtained from AMX and that will contain detailed information about AMX and its management, as well as financial statements.

About AMX

AMX is the leading provider of wireless services in Latin America. As of September 30, 2006 it had over 113 million wireless subscribers and 2 million fixed wire-lines in the Americas.

Legal Disclaimer

This press release contains certain forward-looking statements that reflect the current views and/or expectations of the Company and its management with respect to its performance, business and future events. We use words such as “believe,” “anticipate,” “plan,” “expect,” “intend,” “target,” “estimate,” “project,” “predict,” “forecast,” “guideline,” “should” and other similar expressions to identify forward-looking statements, but they are not the only way we identify such statements. Such statements are subject to a number of risks, uncertainties and assumptions. We caution you that a number of important factors could cause actual results to differ materially from the plans, objectives, expectations, estimates and intentions expressed in this release. AMX is under no obligation and expressly disclaims any intention or obligation to update or revise any forward-looking statements, whether as a result of new information, future events or otherwise.