

December 14, 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:

By this letter, América Móvil, S.A. de C.V. (“América Móvil”) provides information requested by the Federal Communications Commission (“Commission”) staff.

First, América Móvil recently finalized its proposed organizational structure that will exist upon consummation of the acquisition of the shares of Telecomunicaciones de Puerto Rico, Inc. (“TELPRI”), and can report the following (which is also provided in chart format in Appendix A):

- All of the TELPRI shares to be acquired as part of the proposed transactions (currently 93% of the TELPRI shares, but potentially up to 100% of the TELPRI shares) will be acquired by a newly incorporated corporation organized under the laws of Mexico using the name Tenedora Telpri, S.A. de C.V. (“Tenedora”). Tenedora is wholly owned and controlled (99.99%) by Radiomóvil Dipsa, S.A. de C.V. (also known as “Telcel”). The qualifying share of Tenedora, representing 0.01% of its capital stock, is owned by Amov IV, S.A. de C.V. (“Amov IV”) (this share is referred to as a “qualifying share” due to a corporate law requirement in Mexico stipulating that this organizational form have at least two shareholders). Amov IV is a holding company organized under the laws of Mexico, and wholly owned and controlled (99.99%) by Sercotel (the qualifying share of Amov IV, representing 0.01% of its capital stock, is held by Telcel).
- Telcel is a corporation organized under the laws of Mexico, and is América Móvil’s main operating subsidiary in Mexico. Telcel is wholly owned and controlled (99.99%) by Sercotel, S.A. de C.V. (“Sercotel”). The qualifying share of Telcel,

representing 0.01% of its capital stock, is owned by Amov IV.

- Sercotel is América Móvil's main holding company, is wholly owned and controlled (99.99%) by América Móvil, and is organized under the laws of Mexico. The qualifying share of Sercotel, representing 0.01% of its capital stock, is owned by AMX Tenedora, S.A. de C.V. ("AMX Tenedora"), which is itself organized under the laws of Mexico and wholly owned and controlled by América Móvil. The qualifying share of AMX Tenedora, representing 0.01% of its capital stock, is owned by Amov IV.
- As noted elsewhere in the record, América Móvil is organized under the laws of Mexico, and is a publicly traded company in stock exchanges in Mexico, the United States, and Europe.

All the entities in the ownership chain for the acquisition of TELPRI are all wholly owned (directly or indirectly) by América Móvil, and are all organized and incorporated under the laws of Mexico.

Second, as noted in the record of this proceeding,¹ América Móvil's Class AA shares are subject to a requirement that non-Mexican holders of such shares hold them through means that effectively neutralize their votes. América Móvil can report that there are no such similar restrictions for the Series A shares.

Third, América Móvil can report that there are no restrictions on the voting rights of the members of the public who hold the Class A1 shares of América Telecom; holders of América Telecom A1 Shares have full voting rights.²

Fourth, América Móvil can report that the beneficial ownership reporting requirements of Sections 13(d) and 13(g) of the Securities and Exchange Act of 1934 (the "Exchange Act") are applicable to América Móvil's Series A and Series L shares, traded through ADSs in the U.S. Although the Series L shares have voting rights only on limited matters (as described in the record of this proceeding³), holders of the Series L shares are entitled to elect only two members of América Móvil's board of directors. As a result, the Series L shares are not considered a "class of non-voting securities" for purposes of Regulation 13D-G under the Exchange Act.

¹ See Letter from Philip L. Verveer, Counsel to América Móvil, to Ms. Marlene Dortch, Secretary Federal Communications Commission, WT Dkt. No. 06-113, at 2 n. 7 (filed Nov. 1, 2006) ("November 1 Letter").

² América Móvil notes that it has informed the Commission that América Móvil and América Telecom will be merging in the first quarter of 2007. See Letter from Daniel K. Alvarez, Counsel to América Móvil, to Ms. Marlene Dortch, Secretary Federal Communications Commission, WT Dkt. No. 06-113, at 2 (filed Dec. 1, 2006). That transaction will not impact the ultimate control of TELPRI.

³ See November 1 Letter, at 3 n. 8.

Ms. Marlene Dortch
December 14, 2006
Page 3

Fifth, América Móvil's board of directors can vary between 5 and 20 members, but presently has 11 members, two of whom are elected by holders of L shares. The holders of Series L shares are entitled to elect only 2 directors, regardless of the size of the board.

Kindly direct questions or concerns to the undersigned.

Respectfully submitted,

/s/ Michael G. Jones

Philip L. Verveer

Michael G. Jones

Daniel K. Alvarez

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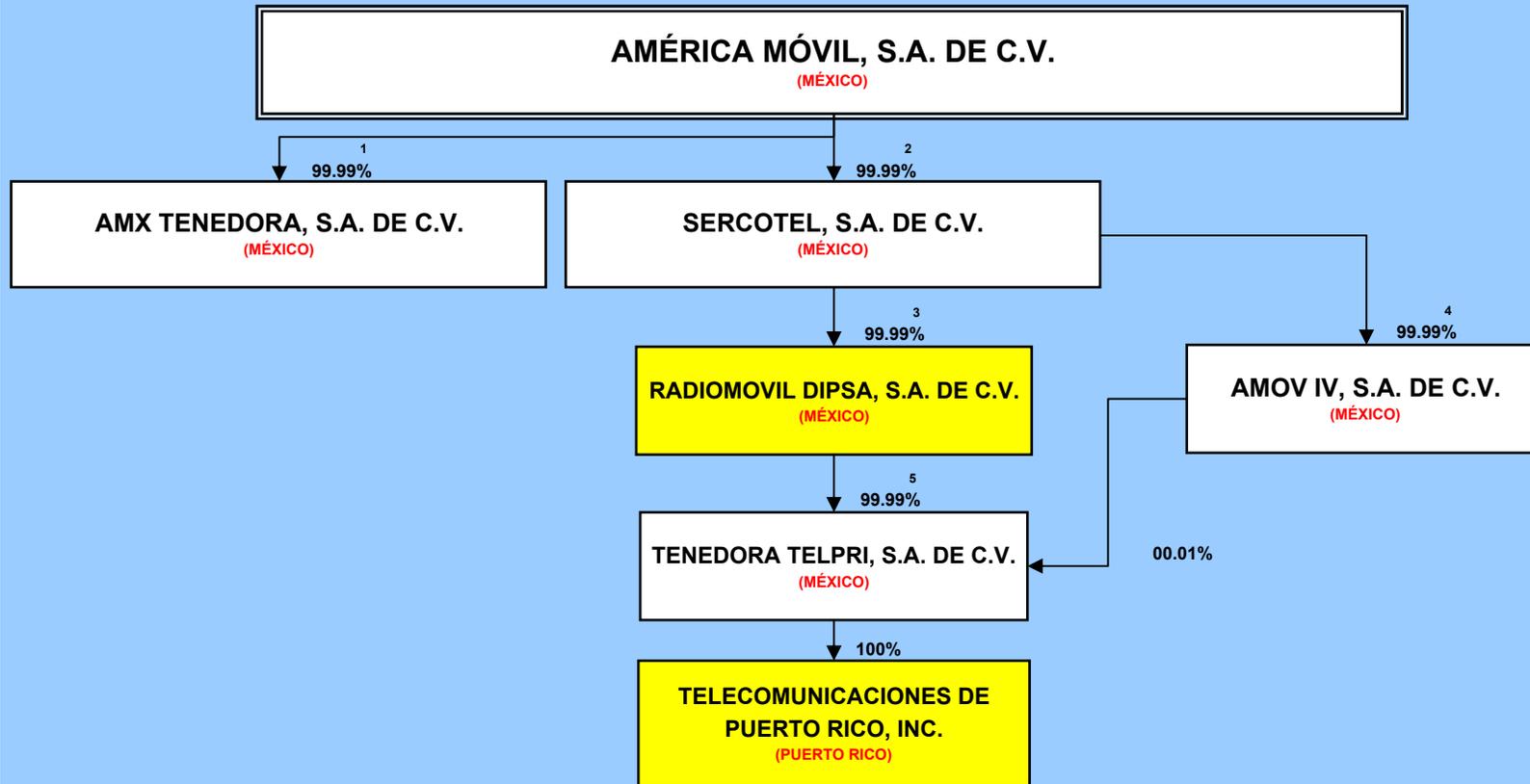
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Counsel to América Móvil, S.A. de C.V.

cc: Susan O'Connell
David Strickland
Jodi Cooper

Appendix A

ACQUISITION OF TELPRI



Notes:

- 1- Amov IV, S.A. de C.V. holds 00.01%.
- 2- AMX Tenedora, S.A. de C.V. holds 00.01%.
- 3- Amov IV, S.A. de C.V. holds 00.01%.
- 4- Radiomóvil Dipsa, S.A. de C.V. holds 00.01%
- 5- Amov IV, S.A. de C.V. holds 00.01%.