

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matters of	)	
	)	
Policies and Rules Governing	)	
Retirement of Copper Loops by	)	RM-11358
Incumbent Local Exchange Carriers	)	
	)	
Petition of XO Communications, LLC,	)	
Covad Communications Group, Inc.,	)	
NuVox Communications and Eschelon	)	
Telecom, Inc. for a Rulemaking to Amend	)	
Certain Part 51 Rules Applicable to	)	
Incumbent LEC Retirement of Copper	)	
Loops and Copper Subloops	)	
	)	
Petition of BridgeCom International, Inc., <i>et al.</i> ,	)	
Petition for Rulemaking and Clarification	)	

**REPLY OF WORLDNET TELECOMMUNICATIONS, INC.**

WorldNet Telecommunications, Inc. (“WorldNet”), by its attorneys, hereby files this Reply in support of the Petitions for Rulemaking and Clarification filed in the above-referenced proceeding.

Founded in 1996, WorldNet is a CLEC that provides a variety of wireline service in Puerto Rico. WorldNet started as a pure reseller of PRTC telecommunications services. After building a strong customer base through resale, in 2002 WorldNet migrated many of its resale customers to services provided over unbundled network element platform (“UNE-P”) circuits leased from PRTC, becoming the first and still only UNE-P provider in Puerto Rico. WorldNet now has deployed its own soft switching and other broadband network equipment and will soon join Centennial to become the second

truly facilities-based local service competitor in Puerto Rico. With this the company is poised to bring advanced broadband service to a desperate Puerto Rican market where broadband penetration rates are low and costs high. For example, WorldNet provides service to a number of municipalities on the Island.

WorldNet has made significant investment in switching and other facilities. Even so, like many facilities-based CLECs providing offerings in under-served areas such as Puerto Rico, WorldNet is still critically dependent upon maintaining continued access to ILEC legacy copper facilities, in this case the copper facilities of PRTC. Without this access, much of WorldNet's investment in facilities would be rendered moot. In many instances, it would not be possible for WorldNet to provision its own loops. It is for this reason, and in light of ongoing problems with interconnection in Puerto Rico, that WorldNet urges the Commission to grant the relief sought in the Petitions.

As the Commission is well aware, the situation for basic telephone service in the Island is dreadful, the local network is in disrepair, and competitive options are limited. *See, e.g.* Statements of Commissioners Copps and Adelstein, *In the Matter of Verizon, Inc.*, WT Docket 06-133, FCC 07-43 (released March 26, 2007). Accordingly, as a condition of the Commission's approval of America Movil's acquisition of PRTC, American Movil is required to invest \$1 billion over five years in communications and/or information services in Puerto Rico.

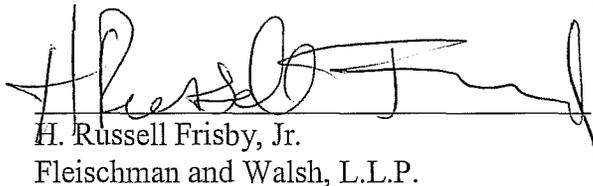
Given the non-specific nature of America Movil's commitment, WorldNet would be at particular risk if PRTC began a program of retiring copper loops without the protections requested by Petitioners. As it is, WorldNet has ongoing problems in

obtaining timely access to critical facilities. PRTC's ability to manipulate the permissive retirement rules presents an additional threat.

At a minimum, therefore, WorldNet submits that it is imperative that CLECs have opportunity to meaningfully challenge proposed loop retirement and to acquire the loops at a reasonable price before retirement.

Respectfully Submitted,

WORLDNET TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "H. Russell Frisby, Jr.", written over a horizontal line.

H. Russell Frisby, Jr.  
Fleischman and Walsh, L.L.P.  
1919 Pennsylvania Avenue, N.W.  
Suite 600  
Washington, DC 20006

Its Attorneys

April 2, 2007

**CERTIFICATE OF SERVICE**

I, Gary Johnson, do hereby certify that I have caused the foregoing REPLY OF WORLDNET TELECOMMUNICATIONS, INC. to be (1) filed with the FCC via its Electronic Comment Filing System in RM-11358; 2) served via email on Ms. Janice Myles, Wireline Competition Bureau, Competition Policy Division, Federal Communications Commission at [janice.myles@fcc.gov](mailto:janice.myles@fcc.gov); and (3) served via email on the FCC's duplicating contractor Best Copy and Printing, Inc. at [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com).

  
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Gary D. Johnson