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November 16, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Re: *Puerto Rico Cable Acquisition Corp. Request for Waiver of 47 C.F.R. § 76.1204(a)(1), CSR-7201-Z*

Dear Ms. Dortch:

On November 15, 2007, Paul Hudson of Davis Wright Tremaine LLP, Counsel for Puerto Rico Cable Acquisition Corp. d/b/a Choice Cable T.V. (“Choice”) met with Michelle Carey, Media Advisor to Chairman Martin to discuss Choice’s request for a waiver of the integration ban. In this meeting, I reemphasized the unique circumstances of the rural Puerto Rican market described in Choice’s October 26, 2007, letter filed in this proceeding.

In short, unless the Commission takes immediate action to grant the remainder of Choice’s unopposed request for waiver, Choice’s HD offering will soon be shut down to customers who have purchased new HDTVs during the holiday season. Choice will later become unable even to replace broken HD converters for existing customers. The cloud cast by this looming uncertainty over Choice’s ability to offer HD service has already forced the company to suspend the expansion of its HD channel offering.

Choice’s customers would receive nothing in return from the shutdown of HD, because, unlike the mainland United States, there are no retail CableCARD devices available in Choice’s market for Choice to support. Imposition of the integration ban in rural Puerto Rico would be unjustified on any schedule until CE manufacturers develop and ship CableCARD devices suitable for Choice’s market. But at a minimum the Commission should avoid implementing the ban on a schedule, designed for the mainland, that chokes off the growth of HD in southwestern Puerto Rico in the year leading up to the DTV transition. Denial of Choice’s requested relief would therefore impose the ban in the wrong place at very much the wrong time.

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Grant of the requested relief would immediately lead to more HD channels, more demand for HDTVs, and more new and improved HD and DVR services available to Choice's customers. The Commission should therefore grant Choice's unopposed request for waiver.

Respectfully submitted,



Paul B. Hudson
Counsel for Puerto Rico Cable Acquisition Corp.

cc: Michelle Carey
Monica Desai
Mary Beth Murphy
Steven Broeckaert
Brendan Murray
Dave Konczal