

December 31, 2007

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

RE: América Móvil Annual Progress Report for the Deployment of the Infrastructure Used to Provide Basic Telephone and Broadband Services in Puerto Rico

WT Docket No. 06-113

Dear Ms. Dortch:

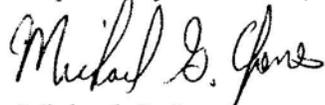
On March 26, 2007, the Federal Communications Commission adopted and released a Memorandum Opinion and Order and Declaratory Ruling approving the transfer of control of Telecomunicaciones de Puerto Rico, Inc. ("TELPRI") to América Móvil S.A.B. de C.V. ("América Móvil"). The Commission's approval is conditioned upon América Móvil's commitment to invest, directly or through TELPRI, \$1 billion over five years in communications and/or information services in Puerto Rico, which investments will promote improvements in these services. In addition, on an annual basis, América Móvil must provide a written report describing the progress it has made in deploying the infrastructure used to provide basic telephone and broadband services in Puerto Rico.

As described in the attached "Annual Infrastructure Deployment Progress Report" for the year ended December 31, 2007, América Móvil has invested through TELPRI approximately \$220,438,000 in numerous projects to improve its wireline, broadband and wireless communications across the Island.

Marlene H. Dortch, Secretary  
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Please direct any questions to the undersigned.

Respectfully submitted,



Michael G. Jones

*Counsel for América Móvil S.A.B. de C.V.  
and Telecomunicaciones de Puerto Rico, Inc.*

Enclosure

cc w/enc: Chairman Kevin J. Martin  
Commissioner Michael J. Copps  
Commissioner Jonathan S. Adelstein  
Commissioner Deborah Taylor Tate  
Commissioner Robert M. McDowell  
Daniel Gonzales  
Michelle Carey  
Scott M. Deutchman  
Barry Ohlson  
Aaron Goldberger  
John Hunter  
Angela Giancarlo  
Chris Moore  
Susan O'Connell  
David Strickland  
Jodi Cooper  
John Copes  
Jim Ball  
Neil Dellar  
Helen Domenici  
Francis Gutierrez  
John Branscome

América Móvil, S.A.B. de C.V.  
Annual Progress Report to the FCC  
For the Year Ended December 31, 2007  
WT Docket No. 06-113

**I. Introduction**

On March 26, 2007, the Federal Communications Commission (“FCC” or “Commission”) adopted a Memorandum Opinion and Order and Declaratory Ruling, (WT Docket No. 06-113) authorizing the transfer of control of Telecomunicaciones de Puerto Rico, Inc. (“TELPRI”) from Verizon Communications, Inc. to América Móvil, S.A.B. de C.V. (“América Móvil”). This authorization is conditioned upon América Móvil’s commitment to invest, directly or through TELPRI, \$1 billion over five years in communications and/or information services in Puerto Rico, which investments will promote improvements in these services.<sup>1</sup>

The Commission also required América Móvil to provide an annual written report, due December 31 of each calendar year, describing the progress it has made in deploying infrastructure used to provide basic telephone and broadband services in Puerto Rico. The following report is submitted in fulfillment of that requirement. The investments reflected in this report have been reported as capital investments consistent with the FCC requirements presented in the Code of Federal Regulations (CFR) Title 47, Part 32 - Section 32.2000, Instructions for Telecommunications Plant Accounts, which provides detailed guidelines for the determination of which costs are to be expensed and which should be capitalized.

América Móvil acquired control of TELPRI on March 30, 2007. From that date through December 31, 2007 (the “Reporting Period”), América Móvil has invested, through TELPRI or TELPRI subsidiaries, approximately \$220,438,000 in telecommunications and information services in Puerto Rico.<sup>2</sup> This report describes this investment in three broad categories: basic wireline service (POTS), broadband/data, and wireless. Note that the broadband/data investment was entirely in the wireline backbone, which is used for the transport of POTS, wireless services and special facilities, as well as for high speed data networks designed for large retail and wholesale customers. Therefore, the amounts reported in the basic wireline service and broadband/data categories should be combined (for a total of approximately \$119.5 million) to understand the full scope of TELPRI’s investments in its wireline infrastructure.

The capital investments described in this report have contributed significantly to the telecommunications and information services infrastructure in Puerto Rico, and have also created a significant number of jobs in the island’s economy, which has an unemployment rate of approximately 11.2%, by far the highest in the United States.

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<sup>1</sup> See *Application for Authority to Transfer Control of Telecomunicaciones de Puerto Rico, Inc. (TELPRI)*, Memorandum Opinion and Order and Declaratory Ruling, 22 FCC Rcd 6195, ¶ 72 (2007).

<sup>2</sup> This amount is estimated because at the time of this report, TELPRI has not yet closed its accounting books for the fiscal year ending December 31, 2007.

## **II. Basic Wireline Service (POTS)**

TELPRI<sup>3</sup> invested approximately \$62,459,350 in its POTS infrastructure during the Reporting Period. This investment has focused on (1) network expansion (including adding capacity to existing facilities as well as constructing new facilities); and (2) maintenance of and improvements to the existing network (including both central offices and external plant).

The largest capital expenditure in network expansion and improvement focused on customer access facilities in new residential developments, including distribution and feeder cables, cross-connect terminals, and all other outside plant from the common distribution frame to the residential unit interface. TELPRI also invested in customer access facilities for new commercial units, including in large part the installation of entrance cables to new commercial units such as bank branches, shopping areas, and office buildings, among others.

TELPRI expanded the capacity of existing distribution facilities by adding distribution pairs, reconfiguring line distribution and using pair gain devices. This was most common in congested areas with old external plant where orders can be delayed due to lack of facilities. Network capacity also was expanded by adding Signaling Transfer Point links to the signaling network and software upgrades to switching equipment in a number of central offices. Finally, TELPRI invested a significant amount in external plant relocation and construction of new underground facilities required by local government agencies as part of road expansion, new road construction, and urban renewal projects.

TELPRI's investment in maintenance, repair and replacement of outside plant during the Reporting Period also was substantial. A major portion of this investment resulted from emergencies, ranging from tropical weather conditions such as storms and floods, to accidents, copper theft and vandalism. A service outage of 15 or more customers is considered an emergency and restoration of their service is given high priority. Among other major investments in this area, TELPRI replaced and added network DC power, generators, A/C equipment and other electrical systems to protect its digital loop carriers, switches and other central office equipment against unexpected power fluctuations and outages.

## **III. Broadband & Data Services**

TELPRI invested approximately \$57,019,740 during the Reporting Period to expand the coverage, increase the capacity and improve the quality of its broadband and

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<sup>3</sup> Investments attributed herein to TELPRI were made through its operating subsidiaries.

data infrastructure. This investment covered two major areas: DSL and high speed data networks.

Specifically, TELPRI added a significant number of DSL ports throughout Puerto Rico and, without increasing its prices, doubled the bandwidth of all its customers. It improved its IP backbone network through a tenfold increase in the capacity of its links and converted a number of DSLAM-ATM interconnections to IP. It also added a substantial number of SIP trunks to meet increasing demand for VOIP services.

To increase the transport capacity of its backbone and address the needs of large customers (both retail and wholesale), TELPRI also invested significantly in its high speed data networks. It added cross connect ports, channel banks and SONET systems in several central offices and expanded the fiber backbone capacity by installing DWDM rings, which increased its ability to manage different types of traffic, services and protocols across the entire network. Finally, TELPRI added transmission and synchronization equipment, as well as fiber optic links, in the existing network.

#### **IV. Wireless Services**

TELPRI invested approximately \$100,958,920 during the Reporting Period to build out a new GSM network and increase the capacity of its CDMA network.

The construction of the new GSM network required the purchase and installation of GSM/GPRS voice and data equipment at radio base stations. Most of these sites include UMTS technology to ensure that wireless broadband access of our GSM customers matches or exceeds that of our CDMA customers. A new home location register (HLR) was also installed. GSM value added services required the acquisition of new platforms for text messaging (SMS), picture delivery (MMS), web browsing (WAP), and content management (Speedy Móvil), as well as upgrades to existing CDMA platforms such as voice mail and ring back tones, to serve the GSM network. For prepaid customers, TELPRI invested in a platform with the capacity to provide data and SMS services on a real-time basis.

Despite its decision to overlay a GSM network, TELPRI remains committed to its existing CDMA customer base, and invested significantly to handle additional voice and data traffic while maintaining its current service levels (which include less than 2% in both dropped calls and ineffective attempts). This investment focused on expanding the capacity of existing switches and installing new carriers. TELPRI also upgraded its backup power supply at a number of existing sites. Finally, TELPRI upgraded several CDMA platforms to enhance its value added services and include new services such as text messaging for our prepaid customers, video streaming, and data roaming.