



April 24, 2008

The Honorable Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: PUERTO RICO CABLE ACQUISITION CORP. REQUEST FOR WAIVER OF 47 C.F.R. § 76.1204(A)(1), CSR-7201-Z

Dear Chairman Martin:

The Cámara de Comercio del Sur de Puerto Rico (Southern Puerto Rico Chamber of Commerce) wishes to convey with the utmost of urgency that the consumers of southern Puerto Rico are in need of the Commission's immediate action to grant to our local cable operator, Choice Cable T.V., the waiver it has requested from the "integration ban."

The Cámara de Comercio is dedicated to the promotion of the best economic interests of the businesses and people of Southern Puerto Rico. It has recently come to our attention that, because of the integration ban, Choice Cable has run out of high-definition and video recorder set-top boxes and is unable to provide such boxes to new customers except when an existing customer returns a working box. The shut-down of Choice Cable's HD service is especially disturbing to us because the satellite providers do not offer their full package of HD programming in Puerto Rico. The unavailability of HD from Choice Cable will stunt demand for HDTV purchases from our retailer members just as those sales had been beginning to surge in Puerto Rico. Tens of thousands of Puerto Ricans have bought HDTVs within the past year as the price of these televisions has dropped significantly and the first Circuit City in our region opened in Ponce a few months ago. We would hope that the FCC would seek to encourage DTV sales in Puerto Rico, rather than discourage it, especially in light of the DTV transition scheduled for February 2009.

The economy of Puerto Rico, especially in the areas outside of San Juan, is considerably different than that of the mainland United States. It would be unreasonable for the FCC to simply apply the same rules to Puerto Rico, on the same schedule, without considering whether those rules are in the best interests of the people of the Commonwealth. We are not aware of any evidence that the integration ban will help consumers or retailers in Southern Puerto Rico, among other reasons because the high-end "CableCARD" devices that we have been told the rule is designed to support are not available in our area. We also are not aware of any evidence that the integration ban will lead to the availability of such devices here any time soon. The ban has already been in effect for nearly a year with no apparent consequence here except to take away from consumers the only option they previously had to obtain HD service.

Denial of Choice Cable's waiver would therefore only hurt the consumers and retailers that the integration ban was designed to help. We therefore urge the Commission to grant Choice Cable its waiver, and to do so *as soon as possible*.

Sincerely,


Mercedes Rodríguez Rodríguez
President 2007-08

xc Hon. Luis G. Fortuño, Congressman

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