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1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
MCLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

May 30, 2008

Bennett L. Ross
202.719.7524
bross@wileyrein.com

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Federal-State Joint Board on Universal Service, High Cost Universal Service Support*, CC Docket No. 96-45, WC Docket No. 05-337

Dear Ms. Dortch:

During our May 15, 2008 meeting with the staff of the Wireline Competition Bureau, Puerto Rico Telephone Company, Inc. ("PRT") was asked to provide updated information concerning the telephone penetration rate in Puerto Rico. To PRT's knowledge, the most current publicly available information from the FCC indicates that Puerto Rico's telephone penetration rate in 2005 was 73.8 percent as compared to 94.8 percent for the United States as a whole.¹ The Census Bureau also publishes data from its 2006 Puerto Rico Community Survey, which reflect that Puerto Rico's telephone penetration rate in 2006 was 73.6 percent.²

Both the FCC data and the Census Bureau data are based on survey questions that do not distinguish between wireless and wireline telephones.³ Thus, because of wireless substitution, it is not possible for PRT to determine based on publicly available data the actual percentage of residential households in Puerto Rico with wireline telephone service.

¹ *Trends in Telephone Service*, Industry Analysis and Technology Division, Wireline Competition Bureau, at 16-6 (Table 16.4) (rel. Feb. 9, 2007) (reporting information from the American Community Survey conducted by the Census Bureau).

² U.S. Census Bureau, American FactFinder, Puerto Rico -- Selected Housing Characteristics: 2006 (indicating that 326,875 of the estimated 1,240,456 occupied housing units in Puerto Rico had no telephone service) (available at http://factfinder.census.gov/servlet/ADPTable?_bm=y&-geo_id=04000US72&-qr_name=ACS_2006_EST_G00_DP4&-ds_name=&-lang=en&-redoLog=false).

³ *Telephone Subscribership in the United States*, Industry Analysis and Technology Division, Wireline Competition Bureau, at 2, n.4 (February 2008) (noting that "[t]he questions are intended to be neutral as to whether the household has wireline or wireless phones").



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However, PRT estimates that as of 2007 only 65.4 percent of residential households in Puerto Rico had wireline telephone service. This estimate was calculated by dividing (i) 811,536 total residential access lines in Puerto Rico served by PRT and other wireline carriers, which was derived utilizing a market study conducted by The Research Office in September 2007 and PRT's billable residential access lines in 2007 as reported in ARMIS, by (ii) 1,240,456 occupied households in Puerto Rico, which is the most current information from the Census Bureau's 2006 Puerto Rico Community Survey. While households with multiple access lines are included in the calculation, PRT believes that the 65.4 percent figure represents a reasonable estimate of current wireline telephone penetration in Puerto Rico.

Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced docket.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bennett L. Ross", written over a circular stamp or mark.

Bennett L. Ross

BLR/rw

cc: Amy Bender
Scott Bergman
Scott Deutchman
John Hunter
Chris Moore
Dana Shaffer
Marcus Maher
Jeremy Marcus
Jennifer McKee
Katie King
Alexander Minard