



FEDERAL COMMUNICATIONS COMMISSION  
Washington DC 20554

April 30, 2009

*Via First Class Mail and Facsimile*

Walter Arroyo  
Puerto Rico Telephone Company, Inc.  
PO Box #390, Calle A  
Mario Juliá Industrial Park  
San Juan, PR 00920-2016

Alejandro Cantu Jiménez  
América Móvil, S.A. de C.V.  
Lago Alberto 366  
Torre 1, Piso 2  
Colonia Anahuac  
11320 Mexico, D.F.

**Re: Request for Information Concerning Applications of AT&T Inc. and Centennial Communications Corp. For Consent to Transfer Control of Licenses, Authorizations, and Spectrum Leasing Arrangements, WT Docket No. 08-246**

Dear Messrs. Arroyo and Jiménez:

On November 21, 2008, the Commission received applications filed pursuant to sections 214 and 310(d) of the Communications Act of 1934, as amended (the "Act"),<sup>1</sup> seeking Commission approval of the transfer of control of licenses, authorizations, and *de facto* transfer and spectrum manager leasing arrangements held by Centennial and its subsidiaries from Centennial to AT&T.<sup>2</sup> In order for the Commission to complete its review of the applications and make the necessary public interest findings under section 310(d) of the Act, we require data from other commercial wireless carriers against which the applicants compete.

Accordingly, pursuant to sections 4(i), 4(j), and 403 of the Act,<sup>3</sup> we request that you provide written data as set forth in the Attachment. Your response will be treated as confidential pursuant to the

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<sup>1</sup> 47 U.S.C. §§ 214, 310(d), and 310(b)(4).

<sup>2</sup> See AT&T Inc. and Centennial Communications Corp. Seek FCC Consent to Transfer Control of Licenses, Leasing Arrangements, and Authorizations, WT Docket No. 08-246, *Public Notice*, DA 08-2713 (rel. Dec. 16, 2008) ("*Public Notice*").

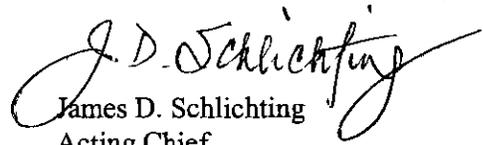
<sup>3</sup> 47 U.S.C. §§ 154(i), 154(j), and 403. See generally *FCC v. Schreiber*, 381 U.S. 279 (1965).

Protective Order issued in WT Docket No. 08-246.<sup>4</sup> We would appreciate receiving your response no later than May 15, 2009.

Your response should be hand delivered to Erin McGrath or Susan Singer of the Wireless Telecommunications Bureau (the "Bureau") and marked "Confidential Information – Subject to Protective Order in WT Docket No. 08-246 before the Federal Communications Commission." A cover letter indicating the delivery of your response must be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, referencing WT Docket No. 08-246. The Protective Order and the Public Notice require the submission of multiple copies of the filing.<sup>5</sup> If you file the cover letter electronically using the Commission's Electronic Comment Filing System ("ECFS"), you should also send a copy of the letter via e-mail to Erin McGrath, erin.mcgrath@fcc.gov, and Susan Singer, susan.singer@fcc.gov.

If you have any questions regarding this matter, please contact Erin McGrath at (202) 418-2042 and Susan Singer at (202) 418-1340.

Sincerely,

  
James D. Schlichting  
Acting Chief  
Wireless Telecommunications Bureau

Attachment

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<sup>4</sup> Applications of AT&T Inc. and Centennial Communications Corp. For Consent to Transfer Control of Licenses, Authorizations, and Spectrum Leasing Arrangements, WT Docket No. 08-246, *Protective Order*, DA 09-541 (rel. Mar. 3, 2003).

<sup>5</sup> See *id.*; *Public Notice*, DA 08-2731.

## Data Request for Third Parties

April 30, 2009

### I. General Information and Data Request

1. Please provide subscriber counts for your company's mobile wireless services in each of the following Puerto Rico Cellular Market Areas (CMA).

- CMA723 Puerto Rico 1-Rincon
- CMA724 Puerto Rico 2-Adjuntas
- CMA725 Puerto Rico 3-Ciales
- CMA726 Puerto Rico 4-Aibonito
- CMA727 Puerto Rico 5-Ceiba
- CMA728 Puerto Rico 6-Vieques
- CMA729 Puerto Rico 7-Culebra

Please further break down the subscriber counts into two categories: pre-paid subscribers, and post-paid subscribers.

2. Please provide coverage maps for a -95 dBm signal level or better for your company's mobile wireless services in each of CMAs listed above. Maps should be submitted in a geo-referenced format, such as a shapefile (for ArcMap) or table (for Mapinfo).

### II. Interrogatory Responses and Document Request

Please submit the interrogatory responses and documents in response to the following questions. Those documents written in a language other than English must be translated into English; submit the foreign language document, with the English translation attached thereto.

1. Describe the nature of and submit documents, including articles of incorporation, by-laws, shareholders agreements, and other organizational documents, sufficient to show:
  - a. The corporate structure of América Móvil, S.A.B. de C.V. ("América Móvil"), Telefonos de Mexico, S.A.B. de C.V. ("Telmex"), and its other subsidiaries. Include explanations of the controlling entities, the percentages of ownership, and a list of the members of all boards of directors and any management or executive committees. Please include an organizational chart.
  - b. The ownership, voting, or management rights of AT&T Inc. ("AT&T") in América Móvil and Telmex.
  - c. América Móvil's and Telmex's ownership, voting, or management rights in AT&T.
  - d. The response to II.1.(b)-(c) above should include discussion of the number of shares held and the percentage of voting rights, any board seats held and representation on any executive or management committees, voting rights, agreements as to how AT&T, América Móvil, or Telmex will vote on the boards, and any veto rights.

2. Describe the transaction or arrangement that resulted in AT&T's ability to appoint member(s) to the Board of Directors of América Móvil and Telmex and the transaction or arrangement that resulted in Telmex's ability to appoint member(s) to AT&T's Board of Directors. Identify the name, title, duties and responsibilities, and dates of service of any current or former employee or agent of AT&T that served on the Board of Directors of América Móvil or Telmex; and the name, title, duties and responsibilities, and dates of service of any current or former employee of América Móvil or Telmex that served on the Board of Directors of AT&T.
3. Describe any ownership interest that AT&T has in América Móvil and Telmex, including the numbers of shares of stock held and percentages of voting rights controlled.
4. Describe in detail all protections currently in place or planned to bar the sharing of financial or other competitively sensitive information between AT&T and América Móvil and Telmex.
5. Identify and describe all services provided by AT&T pursuant to the February 27, 2002 Management Services Agreement between SBC International Management Services, Inc., and Radiomovil Dispa S.A. de C.V. Your response should include, but not limited to, a description of the service, the date the service was provided, the parties, persons or entities involved in the provision of the service; and the reason the service was provided. Please submit a copy of the Management Services Agreement in response to this specification.
6. Identify and describe any contractual, consulting, or strategic relationship between AT&T and América Móvil or Telmex.