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November 10, 2010

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VIA ELECTRONIC FILING

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

Re: *Petition of Puerto Rico Telephone Company, Inc. and Puerto Rico Telephone Larga Distancia, Inc. For Waiver of Section 64.1903 of the Commission's Rules, WC Docket No. 10-52*

Dear Ms. Dortch:

On November 9, 2010, Tom Navin and the undersigned of Wiley Rein LLP, counsel to Puerto Rico Telephone Company, Inc. ("PRT"), met with Cathy Seidel, Deputy Bureau Chief; William Dever, Division Chief, Competition Policy Division; William Kehoe, Senior Counsel, Competition Policy Division; Jennifer Prime, Acting Legal Advisor, Wireline Competition Bureau; Claudia Pabo, Special Advisor, Wireline Competition Bureau; and Pam Megna, Senior Economist, Wireline Competition Bureau. The purpose of the meeting was to discuss the petition filed by PRT and its long distance affiliate, Puerto Rico Telephone Larga Distancia, Inc., seeking a waiver of the structural separation requirements in Section 64.1903 of the Commission's rules, 47 C.F.R. § 64.1903.

During this meeting, PRT's counsel explained why the Commission's structural separation requirements are not necessary to protect telecommunications competition in Puerto Rico and outlined the significant costs and inefficiencies that these requirements impose on the Company. PRT's counsel answered FCC staff's questions regarding the level of competition for residential and business voice services in Puerto Rico and the record evidence about such competition. PRT's counsel also discussed with FCC staff the extent to which granting the requested relief to PRT and PRTLD would be consistent with Commission precedent and the regulatory and operational implications if the Commission were to waive Rule 64.1903 but subject the Company's integrated long distance operations to dominant carrier regulation while the Commission conducted a more extensive competitive analysis of the telecommunications landscape in Puerto Rico.



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

Sincerely yours,

A handwritten signature in black ink, appearing to read "Bennett L. Ross".

Bennett L. Ross

cc: Cathy Seidel
William Dever
William A. Kehoe III
Jennifer Prime
Claudia Pabo
Pam Megna