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February 4, 2011

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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 February 3, 2011, in connection with the above-referenced proceeding, Tom Navin and the undersigned of Wiley Rein LLP, counsel to Puerto Rico Telephone Company, Inc. ("PRT"), met with Lisa Gelb, Associate Bureau Chief, Wireline Competition Bureau; William Kehoe, Senior Counsel, Competition Policy Division; William Dever, Division Chief, Competition Policy Division; Claudia Pabo, Special Advisor, Wireline Competition Bureau; and Pam Megna, Senior Economist, Wireline Competition Bureau.

During this meeting, we discussed the local and long distance services provided by PRT in Puerto Rico and the data the Company expects to present to the Commission to demonstrate that PRT is non-dominant in the provision of in-region, interexchange services. We also discussed the lack of third-party data regarding the size of the telecommunications market in Puerto Rico and possible alternative approaches to estimating market share. Finally, we discussed additional information that Commission staff requested PRT to provide regarding local and long distance competition in Puerto Rico.



Marlene H. Dortch
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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", with a long horizontal flourish extending to the right. The signature is written over the text "Sincerely yours,".

Bennett L. Ross

cc: Lisa Gelb
William A. Kehoe III
William Dever
Claudia Pabo
Pam Megna