

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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

**FILING DEMONSTRATING PUERTO RICO TELEPHONE COMPANY, INC.'S  
LACK OF CLASSICAL MARKET POWER IN LONG DISTANCE SERVICES**

**I. INTRODUCTION AND SUMMARY**

Consistent with the Commission's order conditionally granting a waiver of the section 64.1903 separate affiliate requirement, Puerto Rico Telephone Company, Inc. ("PRT") respectfully submits this filing to demonstrate that it lacks classical market power in providing in-region, interstate and international, long distance services in Puerto Rico.<sup>1</sup>

The telecommunications marketplace in Puerto Rico, as in the rest of the nation, has seen dramatic changes over the past decade. With the evolution of telecommunications technology and the growth of mobile communications, PRT faces significant competition for long distance services. PRT's competitors range from traditional competitive local exchange carriers to intermodal competitors, as well as voice over Internet Protocol ("VoIP") providers and wireless

---

<sup>1</sup> *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*, Memorandum Opinion and Order, WC Docket No. 10-52, DA 10-2418, ¶ 21 (rel. Dec. 23, 2010) ("*Waiver Order*") ("This deferral is further conditioned upon PRT's filing, within ninety days of the effective date of this order, evidence intended to show that PRT lacks classical market power in relation to its in-region, interstate and international, long distance services ....").

carriers. In light of the intense competitive conditions in Puerto Rico, PRT lacks market power in the long distance market – that is, it does not “possess power over price.”<sup>2</sup>

## II. DISCUSSION

### A. PRT Lacks Market Power in In-Region, Interstate, and International Long Distance Services.

The Commission’s regulatory framework distinguishes “between carriers that the Commission determined have market power, which are classified as dominant, and those that do not have market power, which are classified as non-dominant.”<sup>3</sup> The Commission’s dominant carrier regulations are designed to address “classical market power,”<sup>4</sup> which the Commission has defined as “the ability to raise and maintain price above the competitive level without driving away so many customers as to make the increase unprofitable.”<sup>5</sup> The Commission has clarified that the mere fact that a carrier may have certain advantages over its rivals is not sufficient to warrant dominant carrier status unless those advantages are so great as to confer market power on the carrier.<sup>6</sup> That is because the Commission’s “goal in classifying carriers as dominant is to

---

<sup>2</sup> See *Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Phoenix, Arizona Metropolitan Statistical Area*, Memorandum Opinion and Order, WC Docket No. 09-135, FCC 10-113, ¶ 5 (rel. Jun. 22, 2010) (citations omitted).

<sup>3</sup> *Regulatory Treatment of LEC Provision of Interexchange Services Originating in the LEC’s Local Exchange Area and Policy and Rules Concerning the Interstate, Interexchange Marketplace; Leaco Rural Telephone Cooperative, Inc. Petition for Waiver*, Second Order on Reconsideration, 14 FCC Rcd 10771, ¶ 4 (1999) (“*LEC Interexchange Services Order*”).

<sup>4</sup> See, e.g., *Waiver Order* ¶ 17.

<sup>5</sup> *LEC Interexchange Services Order* ¶ 4; see also *Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements*, Report and Order and Memorandum Opinion and Order, 22 FCC Rcd 16440, ¶ 38 (2007) (“*Section 272 Order*”).

<sup>6</sup> See *Competition in the Interstate, Interexchange Marketplace*, 6 FCC Rcd 5880, ¶ 36 (1991) (determining that the business market was “substantially competitive,” the FCC noted “we are cognizant that AT&T is still by far the largest IXC and that it may have certain

protect competition in the relevant market, not particular competitors.”<sup>7</sup> Thus, in assessing whether a particular carrier possesses classical market power, the Commission examines the market participants, the levels of and trends in market share in the relevant product market, and the elasticity of both demand and supply.<sup>8</sup>

At the outset, it is important to put PRT’s telecommunications operations in perspective. Like many local exchange carriers, PRT’s primary market segments consist of: (i) residential and business access lines; (ii) data services; and (iii) exchange access services. PRT has experienced significant losses in each of these market segments. First, between 2003 and 2009, PRT lost 381,749 residential access lines and 82,390 business access lines, which represented a decrease of approximately 41 percent and 28 percent, respectively.<sup>9</sup> In 2010, PRT lost an additional 43,052 residential access lines and 15,511 business access lines.

Second, in 2003, PRT served [ REDACTED ] private line circuits, which generated more than \$[ REDACTED ] in annual revenues. By contrast, by 2009, the number of private

---

advantages by virtue of this fact. Nevertheless, such advantages do not negate significant forces that are driving competition in this market segment.”).

<sup>7</sup> *LEC Interexchange Services Order* ¶ 38.

<sup>8</sup> *See Section 272 Order* ¶ 43. In other proceedings in which the Commission has addressed dominant carrier status, it has utilized data regarding the total size of the relevant market generated by Harte-Hanks. *See, e.g., id.* ¶ 30, n.98; *Qwest Communications International Inc., Petition for Forbearance from the Dominant Carrier Rules as They Apply After Section 272 Sunsets*, Memorandum Opinion and Order, 22 FCC Rcd 5207, ¶ 23, n.82 (2007) (“*Qwest 272 Sunset Order*”). Unfortunately, Harte-Hanks does not collect or report data regarding the telecommunications market in Puerto Rico, and PRT has been unable to obtain similar market data from another source. *See* Declaration of Bennett L. Ross.

<sup>9</sup> Letter from Bennett L. Ross, Counsel for Puerto Rico Telephone Company, Inc. to Marlene H. Dortch, Secretary, FCC, Exhibit A, WC Docket No. 10-52 (filed Mar. 21, 2010).

line circuits served by PRT had declined to [ REDACTED ] and annual revenues from these data circuits had fallen to approximately \$[ REDACTED ].<sup>10</sup>

Third, PRT's exchange access services have declined precipitously. In 2003, PRT billed more than \$[ REDACTED ] in switched access charges; by 2009, PRT's switched access billings were less than \$[ REDACTED ].<sup>11</sup>

The losses that PRT has endured in access lines, data services, and exchange access services are the result of vibrant competition in Puerto Rico, and the host of competitive alternatives available to Puerto Ricans.<sup>12</sup> The Commission has acknowledged as much, noting just last year that PRT's "line losses have resulted from customer migration to new service providers, not from the decisions of customers to terminate service entirely . . . ."<sup>13</sup> According to the Commission's own data, 89 percent of the zip codes in Puerto Rico are served by four or more competing local exchange carriers or non-incumbent VoIP providers, and 57 percent of zip codes on the island are served by eight or more competitors (up from 48 percent just six months earlier).<sup>14</sup> And, as the Commission recently recognized, consumers in Puerto Rico enjoy

---

<sup>10</sup> *Id.*

<sup>11</sup> *See id.*, Exhibit B at 6.

<sup>12</sup> A summary of the local, long distance, and data services offered by PRT's competitors to residential and enterprise customers as reflected on their respective websites is attached as Exhibit 1.

<sup>13</sup> *High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Lifeline and Link-Up*, Order and Notice of Proposed Rulemaking, 25 FCC Rcd 4136, ¶ 27 (2010) ("*Insular Order*") ("find[ing] support for this conclusion in the record," citing comments by Sprint-Nextel that attributed "lower wireline subscribership to customers abandoning traditional wireline service for wireless and VoIP services") (footnote omitted).

<sup>14</sup> *Local Telephone Competition: Status as of June 30, 2010*, Industry Analysis and Technology Division, Wireline Competition Bureau, Table 20 (rel. March 21, 2011) available at [http://www.fcc.gov/Daily\\_Releases/Daily\\_Business/2011/db0321/DOC-305297A1.pdf](http://www.fcc.gov/Daily_Releases/Daily_Business/2011/db0321/DOC-305297A1.pdf). ("*Local Telephone Competition Report*").

“numerous” competitive alternatives for long-distance services.<sup>15</sup> In short, there is no reasonable basis to believe or factual evidence to conclude that PRT possesses classical market power in the in-region, interstate and international, long distance services in Puerto Rico.

**B. PRT Faces Significant Competition in the Provision of Long Distance Mass Market Services.**

The Commission historically has identified two relevant product markets for its mass market analysis: (1) stand-alone long distance services; and (2) bundled long-distance services.<sup>16</sup> Additionally, the Commission considers both the demand for “access” and demand for “usage” when defining relevant product markets. According to the Commission, a customer with a wireless phone, a wireline phone, and a VoIP service subscription over a broadband connection “can make a long distance call” using either of these services, all of which “are in the same product market” for purposes of the Commission’s analysis, “[t]o the extent that consumers view these choices as reasonable substitutes ....”<sup>17</sup>

---

<sup>15</sup> See *Applications of AT&T Inc. and Centennial Communications Corp For Consent to Transfer Control of Licenses, Authorizations and Spectrum Leasing Arrangements*, Memorandum Opinion and Order, 24 FCC Rcd 13915 ¶ 62 (2009) (“After the transaction, customers in Puerto Rico will continue to have numerous alternatives to AT&T for long distance, including Telefónica Larga Distancia de Puerto Rico (TLD), PRT-Larga Distancia, Sprint, Verizon, and cable VoIP providers.”) (“*AT&T/Centennial Order*”).

<sup>16</sup> See *Qwest 272 Sunset Order* ¶ 15 (citing *SBC Communications Inc. and AT&T Corp. Applications for Approval of Transfer of Control*, Memorandum Opinion and Order, 20 FCC Rcd 18290, ¶¶ 82-99 (2005) (“*SBC/AT&T Order*”); *Verizon Communications Inc. and MCI, Inc. Application for Approval of Transfer of Control*, Memorandum Opinion and Order, 20 FCC Rcd 18433, ¶¶ 83-100 (2005) (“*Verizon/MCI Order*”).

<sup>17</sup> *Section 272 Order* ¶ 22, n.73.

As the Commission repeatedly has found, “long distance service purchased on a stand-alone basis is becoming a fringe market.”<sup>18</sup> Nonetheless, the Commission has considered two alternative measures of market share in analyzing stand-alone long distance services. The first considers only consumers with a presubscribed wireline long distance carrier.<sup>19</sup> As of March 21, 2011, PRT served 524,822 residential access lines, of which 327,052 selected Puerto Rico Telephone Larga Distancia, Inc. (“PRTLTD”) as the presubscribed wireline long distance carrier. Of the remaining [ **REDACTED** ] residential access lines served by PRT with presubscribed wireline long distance carriers, PRT’s long distance competitors include AT&T (Centennial), MCI, Primus, Telefónica, and WorldNet.<sup>20</sup>

Because this approach is “overly narrow” and “will tend to overstate” PRT’s market position, the Commission also performs a second market share calculation that “attempts to take into account the ability of presubscribed customers to engage in usage substitution.”<sup>21</sup> This alternate measure is particularly significant in Puerto Rico given the considerable levels of wireless subscribership. Multiple facilities-based wireless carriers, including nationwide carriers AT&T, Sprint, and T-Mobile, as well as various resellers offer a variety of wireless service plans

---

<sup>18</sup> *Id.* ¶ 23; see also *Qwest 272 Sunset Order* ¶ 16; *SBC/AT&T Order* ¶ 91; *Verizon/MCI Order* ¶ 92.

<sup>19</sup> *Section 272 Order* ¶ 24; *Qwest 272 Sunset Order* ¶ 17.

<sup>20</sup> Of the residential access lines served by PRT, [ **REDACTED** ] do not have a presubscribed wireline long distance carrier.

<sup>21</sup> *Section 272 Order* ¶ 24 (noting that considering only customers with a presubscribed wireline long distance carrier “ignores two important factors: the ability of all presubscribed interexchange customers to make interstate, long distance calls using transaction services, such as prepaid calling cards and dial-around services; and the fact that a majority of these customers also subscribe to mobile wireless service and can make interstate, long distance calls using their wireless phones”); see also *Qwest 272 Sunset Order* ¶ 17.

in Puerto Rico.<sup>22</sup> The Commission has found that “mobile wireless coverage in Puerto Rico is nearly ubiquitous,”<sup>23</sup> and, as of June 30, 2010 – which is the most current Commission data – there were nearly 2.9 million wireless subscribers in Puerto Rico, up from 1.1 million in 2001.<sup>24</sup>

In addition to standalone residential long distance service, the Commission also considers bundled local and long distance services as a separate relevant product market.<sup>25</sup> Although PRT – like many incumbent carriers – has developed marketing and pricing strategies “to encourage subscription to a bundled service package,”<sup>26</sup> competition for these bundled services is particularly fierce in Puerto Rico. PRT competes in urban areas against three established intermodal competitors – Choice in the South West region of Puerto Rico, Liberty in the North/Central and Eastern regions of Puerto Rico, and OneLink in the San Juan metropolitan area. Each of these competitors offers a variety of service bundles to residential customers that include long distance.<sup>27</sup>

Although PRT is not privy to the number of residential access lines served by its competitors, there are 1,210,537 households in Puerto Rico, and the Commission has determined that approximately 92 percent of Puerto Rico residents have telephone service.<sup>28</sup> Because PRT

---

<sup>22</sup> *Local Telephone Competition Report*, at 28, Table 17; *AT&T/Centennial Order*, ¶ 134.

<sup>23</sup> *Insular Order*, 25 FCC Rcd 4136, ¶¶ 19 & 28.

<sup>24</sup> *See Local Telephone Competition Report* at Table 17.

<sup>25</sup> *Section 272 Order* ¶ 26; *Qwest 272 Sunset Order* ¶ 19; *SBC/AT&T Order* ¶¶ 95-96; *Verizon/MCI Order* ¶¶ 96-97.

<sup>26</sup> *Section 272 Order* ¶ 27.

<sup>27</sup> *See Exhibit 1* at 1-2.

<sup>28</sup> *See 2006-2008 American Community Survey 3-Year Estimates, Puerto Rico Community Survey* (available at <http://www.factfinder.census.gov>); *Universal Service Monitoring Report*, CC Docket No. 98-202, Table 6.4 (rel. Dec. 2009) (available at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-295442A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-295442A1.pdf)).

provides local exchange service to less than half of the households in Puerto Rico and with its wireless affiliate – Claro – serving approximately [ REDACTED ] wireless subscribers, PRT’s share of the residential long distance market is well below any level that reasonably could be considered “dominant.”

With regard to other market factors, such as demand and supply elasticity, the Commission has previously considered such factors as “the increase in subscriptions to broadband Internet access services, the increase in subscriptions to mobile wireless services, and the migration of wireline minutes to mobile wireless minutes.”<sup>29</sup> The Commission’s data show that broadband Internet access subscriptions in Puerto Rico have increased: in the 18-month period from December 2008 through June 2010, the percentage of households with high speed Internet access connections in Puerto Rico increased from 24 percent to 37 percent.<sup>30</sup> And during the same period, wireless subscribers in Puerto Rico increased from approximately 2.6 million to 2.9 million.<sup>31</sup> All of these factors underscore that consumers in Puerto Rico are willing to shift usage to other competitive offerings in response to changes in the relative prices.

And with regard to supply substitutability or elasticity, based on the number of competitive providers and offerings in Puerto Rico, the Commission should find, as it has before, that significant excess capacity exists for the provision of long distance services, which would permit competitors to expand their output should any one carrier attempt to raise the price of

---

<sup>29</sup> *Section 272 Order* ¶ 45.

<sup>30</sup> *High-Speed Services for Internet Access: Status as of December 31, 2008*, Industry Analysis and Technology Division, Wireline Competition Bureau, Table 21 (Feb. 2010), available at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-296239A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-296239A1.pdf); *Internet Access Service: Status as of June 30, 2010*, Industry Analysis and Technology Division, Wireline Competition Bureau, Table 16 (Mar. 2011) available at [http://www.fcc.gov/Daily\\_Releases/Daily\\_Business/2011/db0321/DOC-305296A1.pdf](http://www.fcc.gov/Daily_Releases/Daily_Business/2011/db0321/DOC-305296A1.pdf).

<sup>31</sup> *See Local Telephone Competition Report*, Table 17.

these services.<sup>32</sup> Indeed, given their size and international capabilities, competitors such as AT&T and Telefónica could readily expand their output for long distance services in response to any price increases by PRT.

C. **PRT Faces Significant Competition in the Provision of Long Distance Enterprise Services.**

In the retail enterprise market, the Commission has focused on the following interstate services in assessing market power – long distance voice services, ATM, Frame Relay, and T1 and T3 services. Although PRT does not have data reflecting its share of these various product markets, PRT lacks market power with respect to enterprise in-region, interstate and international, long distance services. With the exception of Frame Relay service, which has experienced some modest growth, between 2003 and 2009, PRT sustained sizeable declines in ATM subscribers [ REDACTED ], business access lines [ REDACTED ], and private line circuits [ REDACTED ].<sup>33</sup>

The competitive losses that PRT has sustained in the enterprise market are attributable to the formidable competition that PRT faces in providing long distance voice and data services to business customers. For long distance voice services, PRT competes against AT&T (Centennial), MCI, Primus, Sprint, WorldNet, Telefónica, and Optivon, all of which offer long distance voice services to business customers throughout Puerto Rico.

---

<sup>32</sup> *Id.* ¶ 46; *Qwest 272 Sunset Order* ¶ 39 (citing *Regulatory Treatment of LEC Provision of Interexchange Services Originating in the LEC's Local Exchange Area and Policy and Rules Concerning the Interstate, Interexchange Marketplace*, Second Report and Order and Third Report and Order, 12 FCC Rcd 15756, ¶ 97 (1997); *SBC/AT&T Order* ¶¶ 147-52; *Verizon/MCI Order* ¶¶ 145-51).

<sup>33</sup> Letter from Bennett L. Ross, Counsel for Puerto Rico Telephone Company, Inc. to Marlene H. Dortch, Secretary, FCC, Exhibit A, WC Docket No. 10-52 (filed Mar. 21, 2010).

The level of competition that PRT faces in the enterprise market is underscored by the Commission's own data. According to the Commission, as of June 30, 2010, 47 percent of the business end-user switched access lines and VoIP subscriptions in Puerto Rico were served by competitors.<sup>34</sup> By comparison, the Commission's data reflected that competitors served 43 percent of the business end-user switched access lines and VoIP subscriptions in Puerto Rico as of December 31, 2008 – an increase of four percentage points in just 18 months.<sup>35</sup>

PRT also competes against established providers offering integrated voice and data services to enterprise customers, including, among others, AT&T (Centennial), Choice Cable, Liberty, OneLink, WorldNet, Sprint, Telefónica, Optivon and PREPA.Net. With AT&T's acquisition of Centennial, PRT faces even stiffer competition because AT&T can “provide its business customers in Puerto Rico a single point of contact for their telecommunication services instead of relying on local services provided by third parties” such as PRT, and can offer business customers in Puerto Rico access to “AT&T's global service offerings, including global Internet service, Enhanced VPN and other advanced managed services.”<sup>36</sup>

And PRT faces a formidable competitor in PREPA.Net, which is owned by the Puerto Rico Electric Power Authority. Since 2005, PREPA.Net has provided fiber-based telecommunications services, such as wavelength services, Ethernet transport services, and SONET-based private line services to carriers, Internet service providers, and large enterprise customers. PREPA.Net currently provides service to [

---

<sup>34</sup> *Local Telephone Competition Report*, Table 8.7.

<sup>35</sup> *Local Telephone Competition: Status as of December 31, 2008*, Industry Analysis and Technology Division, Wireline Competition Bureau, Table 10 (rel. Jun. 2010) *available at* [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-299052A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-299052A1.pdf).

<sup>36</sup> *AT&T/Centennial Order*, ¶ 107.

**REDACTED**

] which at one time were served by PRT. Other customers that PREPA.Net has won from PRT include [

**REDACTED**

], among others.

In addition to PREPA.Net, PRT has lost a number of large business accounts to other competitors in the past three years, including [

**REDACTED**

]. These competitors winning these customers from PRT include AT&T (Centennial), Optivon, Telefónica, Sprint, and WorldNet. The revenues lost by PRT from these business accounts were well in excess of \$ [ **REDACTED** ] annually.

Additionally, as in the mass market, supply and demand in the enterprise market are highly elastic. On the supply side, PRT's numerous competitors have significant capacity to serve the needs of enterprise customers. This is particularly true for such international carriers as AT&T and Telefónica. And on the demand side, as the Commission has found, "enterprise customers tend to be sophisticated purchasers of communications services" and "[b]ecause enterprise customers tend to make their decisions about communications services by employing communications consultants or in-house communications experts, we expect them to be aware of

the multitude of choices available to them.”<sup>37</sup> The Commission’s finding is particularly true in Puerto Rico, as evidenced by the significant competitive losses PRT has sustained in the enterprise market.

### **III. CONCLUSION**

For the foregoing reasons, the Commission should find that PRT is nondominant in the provision of in-region, interstate and international, long distance services.

Respectfully submitted:

Francisco J. Silva  
**PUERTO RICO TELEPHONE COMPANY, INC.**

By: Bennett L. Ross

Bennett L. Ross  
Thomas J. Navin  
Priscilla Delgado  
**WILEY REIN LLP**  
1776 K Street, NW  
Washington, DC 20006  
(202) 719-7000

March 23, 2010

Counsel for Puerto Rico Telephone Company,  
Inc.

---

<sup>37</sup> Section 272 Order ¶ 57; see also *Qwest 272 Sunset Order* ¶ 46; *SBC/AT&T Order* ¶ 78.

**EXHIBIT 1**

## COMPETITIVE SUMMARY – PUERTO RICO

### Wireline/VoIP - Residential

#### **AT&T**

- Bundled Local and Long Distance
- For Puerto Rico (based on ZIP code 00921), AT&T offers the following Home Phone wireline plan *AT&T One Rate® 10¢ Nationwide Direct Plan*
  - 10¢ per minute for state-to-state, in-state long distance and local toll calls (if subscribed to AT&T local toll service) direct dialed from home, 24 hours a day, 7 days a week.
  - Monthly plan fee of \$2.99.
- [https://www.shop.att.com/offer.jsp?service=ld&offer=shop\\_or\\_nw\\_direct&portal=shopatt](https://www.shop.att.com/offer.jsp?service=ld&offer=shop_or_nw_direct&portal=shopatt)

#### **Choice Cable**

- Standalone Intra-Island VoIP offering - Choice advertises \$15 per month for 200 minutes Intra-Island and \$0.06 per minute beyond that. Additional fees apply for modem.
- Phone/Internet bundled offerings start at \$35 per month, and other bundles include video.
- The Choice cable franchise area includes 31 municipalities in Puerto Rico.
- <http://www.choicecable.com/telefonía%20digital%20choice.asp>

#### **Liberty**

- Standalone VoIP plans include:
  - \$19.99, includes 300 minutes Intra-Island.
  - \$24.99, includes unlimited Intra-Island.
  - \$29.99, includes unlimited Intra-Island and US.
  - \$60.99, includes unlimited Intra-Island, US, and 2000 minutes international calling. Additional minutes vary on destination. Additional local/interstate minutes \$0.079.
- Bundled Internet, video, and unlimited calling within PR for \$74.00 per month.
- The Liberty cable franchise area includes 37 municipalities in Puerto Rico.
- <http://www.libertypr.com/products.asp?prod=108&cat=57&hierarchy=0>

#### **MCI International**

- *Bundled Local and LD*: MCI International's Nationwide 200 Plus Plan, with 200 state-to-state, instate, and local minutes is available for Puerto Rico on the MCI website for \$13.99 per month. Additional domestic calls as low as \$0.05 per minute.
- [http://consumer.mci.com/res\\_long\\_distance/Product.jsp?ProductID=nationwide200\\_plus](http://consumer.mci.com/res_long_distance/Product.jsp?ProductID=nationwide200_plus)

### **OneLink**

- OneLink offers VoIP plans with unlimited calls to Puerto Rico and the US, with low international rates (prices not specified on website).
- Onelink provides services to eight municipalities (San Juan, Bayamón, Cataño, Carolina, Guaynabo, Toa Alta, Toa Baja and Trujillo Alto).
- <http://www.onelinkpr.com/#/home/>

### **Primus Caribbean**

- Offers VoIP plans starting at \$19.95
- [http://www.ptgi.com/docs/fr\\_usa.html](http://www.ptgi.com/docs/fr_usa.html)

### **Telefonica LD**

- Hello Unlimited Plan: Unlimited calls within Puerto Rico. Unlimited calls to US and VI. And 100 countries lower rates per minutes. \$7.75
- \$0.05 per minute for calls to the US, with free weekends. \$0.10 per minute for calls within PR, free weekends. \$0.33 per minute on the weekend international. \$0.43 per minute during the week. \$9.95 monthly charge.
- Standalone Long Distance
  - \$0.03 per minute plan for all LD calls in PR and the US.
  - \$0.09 per minute to the US plan.
- <http://www.telefonica.pr/empresas/Residencial.html>

### **WorldNet**

- Bundled Local and Long Distance
  - Offers several internet and voice plans that start at \$45.00 per month with unlimited local calling, \$0.06 per minute for intra-island and US calling.
- <http://www.worldnetpr.com/ESP/residencial.html>

### **IP Solutions**

- Although primarily an enterprise provider, IP Solutions advertises a bundled VoIP/Internet Residential Unlimited plan for \$29.99 per month for 500 minutes at \$0.05 per minute for VoIP and Internet at 1Mb/512k.
- <http://www.ipsolutions.us/aboutus.html>

### **Wireless**

## **AT&T**

- AT&T's Puerto Rico Calling Plan includes 350 minutes, unlimited intraisland incoming calls for \$29.99 per month, long distance \$0.15 per minute.
- AT&T Nation Plan also available starting at \$39.99 per month for 450 minutes, with no LD or roaming charges in the U.S.
- Unlimited Nation Plan - \$69.99 per month.
- [http://www.wireless.att.com/cell-phone-service/cell-phone-plans/individual-cell-phone-plans.jsp?\\_requestid=35168](http://www.wireless.att.com/cell-phone-service/cell-phone-plans/individual-cell-phone-plans.jsp?_requestid=35168)

## **North Sight Communications Inc. d/b/a Proxtel**

- "No contract" plans start at \$14.95 (per month it appears), offers unlimited talk in Puerto Rico for \$54.95.
- Appears to be available to both residential and business customers. Includes walkie-talkie plans suggesting geared towards business use.
- <http://www.proxtelwireless.com/Planes.htm>

## **PR Wireless d/b/a Open Mobile**

- Plans with unlimited talk and unlimited Long Distance to the US starting at \$45.00
- Unlimited local calling plans in Puerto Rico start at \$35.00 per month.
- Coverage area covers most of the population on the island (not central mountains)
- <http://www.openmobilepr.com/>

## **Tracfone**

- Tracfone offers prepaid wireless services in Puerto Rico.
- <http://www.tracfone.com/about.jsp?task=about>

## **Simple Mobile**

- Unlimited nationwide talk and text start at \$40.00 per month. Additional plans including data start at \$50.00 per month.
- <http://www.mysimplemobile.com/?gclid=CNjet67y4KcCFYxd5Qodpi739w>

## **Sprint**

- \$99.99 per month for unlimited data, unlimited nationwide Long Distance
- 450 min plan with unlimited mobile to mobile calling, and free nights and weekends. \$49.99 with data, without data \$39.99
- 200 minute plan, with nationwide Long Distance, starts at \$29.99.
- A number of plans with unlimited mobile to mobile throughout the US plus free nights and weekends are also available.

- [http://www.sprint.com/business/products/products/evdoCoverage2.jsp?map=PuertoRico\\_PR&mrkt=Puerto%20Rico,%20Pr](http://www.sprint.com/business/products/products/evdoCoverage2.jsp?map=PuertoRico_PR&mrkt=Puerto%20Rico,%20Pr)

### **T-Mobile**

- Free US long distance and Puerto Rico long distance starts with 300 minute plan for \$29.99, includes unlimited in-network and free nights and weekends
- Unlimited voice and data plans also available (including free nationwide Long Distance) starting at \$69.99.
- <http://www.t-mobile.com/pr/>

### **Virgin Mobile**

- Offers prepaid services in Puerto Rico
- <http://www.virginmobileusa.com/>

## **Enterprise**

### **AT&T**

- Offers a variety of enterprise services
- <http://www.business.att.com/enterprise/all-business-solutions/?source=IEa2250011tpdsVA>

### **Choice**

- Offers business services, including high speed Internet and video
- <http://www.choicecable.com/choiceserv.asp>

### **Critical Hub Networks, Inc. d/b/a Caribe.net**

- Offers “Megabit Internet” and Enterprise VoIP Telephony including SIP trunking.
- <http://www.caribe.net/services.html>

### **Data Access/ Data @ccess**

- Offers the following enterprise products and services: ATM, high-speed Internet access, Ethernet services, Frame Relay, VPN, VoIP, and SIP trunking.
- Services are available in all urban areas in Puerto Rico (Mayaguez, Ponce, San Juan)
- <http://www.dataaccesspr.com/main/>

### **IP Solutions**

- Offers dedicated data connections, VoIP, and web hosting to enterprise customers.
- Commercial VoIP offering prices detailed at [http://www.ipsolutions.us/ips\\_voip.html](http://www.ipsolutions.us/ips_voip.html)
- <http://www.ipsolutions.us/>

### **Liberty**

- Offers, voice, data and video solutions for small to large businesses.
- <http://www.libertypr.com/business/>

### **Optivon**

- Offers IP Telephony, IP Trunking and IP Centrex, including high speed Internet Access from 1 to 45 Mbps as well as Ethernet services to enterprise customers.
- [https://www.optivon.com/us/about/about\\_us.cfm](https://www.optivon.com/us/about/about_us.cfm)

**Prepa Networks Corp. (“PREPA.Net”)**

- Provides telecommunications services to carriers, ISPs and large enterprises.
- Offers wavelength services, Ethernet transport service, SONET-based private line service, and IP services optimized for VoIP and other related services.

**Primus Telecommunications**

- Offers enterprise services, including Business VoIP, Voice and Conferencing, and data transport.
- [http://www.ptgi.com/business/business\\_services.html](http://www.ptgi.com/business/business_services.html)

**Soriel Telecom**

- Offers enterprise VoIP, hosting and Wi-Fi solutions.
- <http://www.sorieltelecom.com/>

**Sprint**

- Offers IP and MPLS services to enterprise customers
- <http://convergence.sprint.com/downloads/Managed%20Network%20Solutions%200Brochure.pdf?id4=WL:NMB:20091120:MNS:HL1>
- [https://www.sprint.net/network\\_maps.php](https://www.sprint.net/network_maps.php).

**Telefonica**

- Offers long distance, local voice, data services to enterprise customers.
- <http://www.telefonica.pr/empresas/ServicioLocal.html>

**WorldNet**

- Offers the following enterprise services: VoIP based telephony, ADSL, ISDN-PRI, MPLS, EFN and Point to Point connections.
- According to its website, WorldNet is the third largest telecommunications provider in Puerto Rico and boasts having invested \$40 million in infrastructure
- Offers enterprise phone services starting at 4 lines for \$322 per month, including DSL at 1MB/1MB
- [http://www.worldnetpr.com/ESP/ecall\\_emp.html](http://www.worldnetpr.com/ESP/ecall_emp.html)