

June 14, 2011

**VIA Electronic Filing**Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, DC 20554Re: *Puerto Rico Cable Acquisition Corp. Request for Waiver, CSR-7201-Z*

Dear Ms. Dortch:

On June 10, 2011, in my capacity as counsel for Puerto Rico Cable Acquisition Corp. d/b/a Choice Cable T.V. (“Choice”), I spoke with Brendan Murray of the Commission’s Media Bureau regarding Choice’s request for an extension of the waiver previously granted in the above-captioned proceeding. I advised Mr. Murray that Choice received its first request from a customer for a CableCARD to use in a retail digital video recorder (DVR) on June 4, 2010 and its second request on December 2, 2010. I also advised that Choice has not received any formal complaints from customers regarding the availability of, or its support for, CableCARDS. I am aware of one instance of temporary customer dissatisfaction but their concerns were promptly resolved.

When the Commission granted Choice’s initial waiver for HD/DVRs, it found that the Puerto Rican market was different from the mainland United States, among many other reasons, because of the unavailability of retail DVRs in Choice’s service area. That fact has not materially changed. TiVo still will not ship its devices to Puerto Rico, according to its website. At present, Choice is not aware of any retail store in its service area that has CableCARD retail devices in stock. The Sears in Ponce may have carried TiVos for a time, but on June 13, 2011 a Choice employee visited the store and found no CableCARD devices. In 2010, Choice decided to obtain a TiVo to test CableCARDS in its system, but was unable to find any in its market, so a Choice employee drove nearly three hours round trip to purchase a TiVo in the capital of San Juan.

Thus, the fact that Choice has provisioned so few CableCARDS reflects the lack of availability and limited demand in Choice’s low-income communities for retail DVRs and their expensive service plans – and not any lack of support by Choice for retail devices. Choice’s successful provisioning of CableCARDS in fact demonstrates that Choice has, as promised, configured its network to support CableCARDS even though it does not use them in its own set-top boxes and even though retail devices cannot even be found at retail stores in its service area.

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For these reasons, the Commission's rationale for waiver remains notwithstanding the appearance of a small handful of retail DVRs in Puerto Rico.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "PBH", written in a cursive style.

Paul B. Hudson

cc: Brendan Murray