

June 27, 2011

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

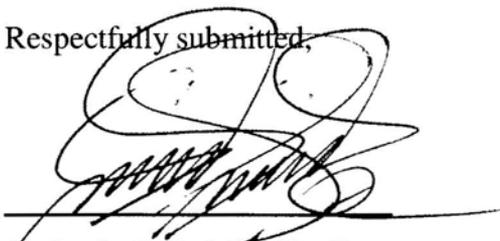
Re: CC Docket No. 96-128 – Petition for Waiver

Dear Ms. Dortch:

Pursuant to Section 1.3 of Federal Communications Commission's Rules, Puerto Rico Telephone Company, Inc. ("PRTC") and PRT Larga Distancia, Inc. ("PRT LD"), are requesting a temporary waiver of the Commission's audit requirement contained in Section 64.1320, the original of which is enclosed.

PRTC and PRT LD need a brief extension of time until October 31, 2011 to complete their payphone call tracking system audits and file the corresponding audit report.

Respectfully submitted,



Carlos D. Ruiz Mantilla, Esq.

Regulatory Compliance Manager

Enclosure

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

)	
In the Matter of Implementation)	
of the Pay Telephone Reclassification)	
and Compensation Provisions of the)	CC Docket No. 96-128
Telecommunications Act of 1996)	
)	
)	

PETITION FOR WAIVER

TO THE HONORABLE COMMISSION:

COME NOW, Puerto Rico Telephone Company, Inc. ("PRT") and PRT Larga Distancia, Inc. ("PRTLTD"), collectively referred as "the Companies"¹, by their undersing attorney, to request a temporary waiver of the Commission's audit requirement contained in Section 64.1320², pursuant to Section 1.3 of the Federal Communications Commission's rules. The Companies need a brief extension of time until October 31, 2011 to complete their audits and file the corresponding audit reports. As explained below, there is good cause for granting this Petition, and the Petition is in the public interest.

The Companies are completing carriers within the meaning of Section 64.1300³ of the Commission's rules and are therefore required on an annual basis to complete by July 1st an audit of their payphone call tracking systems, pursuant to Section 64.1320⁴.

The Companies have selected an independent third party auditor, and the audit process is underway. Nonetheless, the Companies anticipate that it may take an additional three months for

¹ PRT and PRTLTD are both wholly owned subsidiaries of Telefónica de Puerto Rico, Inc. ("TELPRI").

² See, 47 C.F.R §64.1320.

³ *Supra*, §64.1300.

⁴ *Supra*, §64.1320.

them and the auditors to complete the documentation and testing, analyze the results, and prepare a final report for the Commission.

Section 1.3 allows the Commission to waive its rules where “good cause” exists. The Commission has concluded that good cause exists where “special circumstances warrant a deviation from the general rule, such deviation serves the public interest, and waiver would be consistent with the principles underlying the rule.”⁵ Such good cause exists here.

The Companies have diligently worked to comply with the Commission’s compensation requirements and have implemented a payphone call tracking system, pursuant to Section 64.1310(a)(1)⁶. However, given the timing of the Companies to conclude a detailed evaluation of their aforementioned systems, the Companies do not have sufficient time to complete the audits by July 1, 2011. The Companies are sincerely committed to complete their audits as expeditiously as possible.

No party will be harmed by the delay in completion of the audits because the Companies’ payphone call tracking systems are already in place and working properly. Moreover, since the effective date of these rules, the Companies have never received a dispute or claim by any payphone service provider regarding payphone compensation.

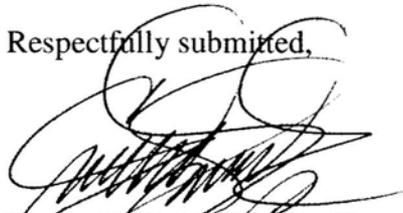
Thus, the public interest is best served by allowing the Companies and its auditors adequate time to complete their tasks and present the most comprehensive and reliable information possible to the Commission.

⁵ *Northeast Cellular Tel. Co., L.P. v. FCC*, 897 F2d 1164, 1166 (D.C. Cir. 1990) (citing *WAIT Radio v. FCC*, 418 F2d 1153, 1159 (D.C. Cir. 1969)).

⁶ *See*, 47 C.F.R. §64.1310(a)(1).

WHEREFORE, the Companies respectfully request that the Commission grant this Petition for Waiver by extending the deadline for the Companies to complete their payphone call tracking system audits, until October 31, 2011.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Carlos D. Ruiz-Mantilla', written over a circular stamp or mark.

Carlos D. Ruiz-Mantilla, Esq.
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Their Attorney

June 29, 2011