



September 19, 2014

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

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

Dear Ms. Dortch:

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

PRTC needs a brief extension of time until December 15, 2014 to complete its payphone call tracking system audits and file the corresponding audit report.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carlos D. Ruiz Mantilla", written over a horizontal line.

Carlos D. Ruiz Mantilla, Esq.
Regulatory Compliance Manager

Enclosure

December 15, 2014 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.”⁴ Such good cause exists here.

PRTC has diligently worked to comply with the Commission’s compensation requirements and has implemented a payphone call tracking system, pursuant to Section 64.1310(a)(1)⁵. However, given the timing of PRTC to conclude a detailed evaluation of its aforementioned systems, PRTC does not have sufficient time to complete the audit by October 1, 2014. PRTC is sincerely committed to complete this audit as expeditiously as possible.

No party will be harmed by the delay in completion of the audit because PRTC’s payphone call tracking systems is already in place as required by the Commission.

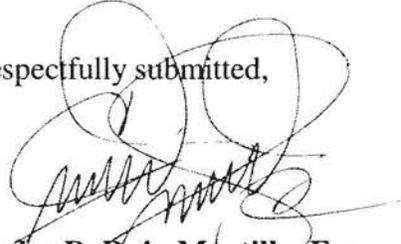
Thus, the public interest is best served by allowing PRTC and its auditors adequate time to complete their tasks and present the most comprehensive and reliable information possible to the Commission.

⁴ *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)).

⁵ *See*, 47 C.F.R. §64.1310(a)(1).

WHEREFORE, PRTC respectfully requests that the Commission grant this Petition for Waiver by extending the deadline for PRTC to complete its payphone call tracking system audit, until December 15, 2014.

Respectfully submitted,

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

Carlos D. Ruiz-Mantilla, Esq.
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Its Attorney

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