

## **AMENDED PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.333**

December 23, 2020

Pursuant to section 51.333(b)(2) of the Commission's rules, 47 C.F.R. § 51.333(b)(2), Puerto Rico Telephone Company, Inc. ("PRTC") hereby gives notice of its planned retirement of two copper feeder cables. This Amended Public Notice amends and replaces the Public Notice released on November 23, 2020.

For additional information on these copper retirements, please contact Mr. Mario Barrera, Chief Operations Officer, 1513 Roosevelt Avenue, Guaynabo, PR 00920, (787) 749-2087.

**Implementation Date:** On or after April 15, 2021

**Locations:** PRTC hereby provides notice of its intent to retire Feeder Cables 17 and 19 in the municipality of Carolina, Puerto Rico (the "Feeder Cables"). The Feeder Cables serve the Carolina CN DMS 100 Central Office (CLLI CRLNPRCO).

The retirement of the Feeder Cables will impact all locations served by the following PRTC network nodes:

- 19000I142<sup>1</sup>
- 19000IP14
- 19000IP15
- 19000I129
- 19000I130
- 19000I218
- 19000IP39
- 19000IP41
- 19000IP45

The specific impacted locations in these areas are identified in Exhibit A, which may be viewed on PRTC's website at <https://www.claropr.com/personas/legal-regulatorio/>.

**Description of the planned network change:** PRTC plans to retire the Feeder Cables after determining that their repair is not viable. Each of the Feeder Cables suffered significant damage dating to the impact of Hurricane Maria in September 2017 and the months of power outages and unreliable access to power that plagued Puerto Rico well into 2018. This combination of circumstances caused water and humidity to seep and gradually damage the copper loops inside the cables.

After assessing the condition of the Feeder Cables, the recurrence of breakdowns due to the conditions identified above, and the costs entailed in repairing them, PRTC has concluded that

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<sup>1</sup> This network node, and the locations served by it, were included in PRTC Notice of Copper Retirement 2020-0003.

repairing the Feeder Cables is not viable and that their replacement with fiber facilities is the best course of action to restore service as quickly as possible and avoid future service outages in the impacted locations.

**Description of reasonably foreseeable impact of the planned changes:** After the Feeder Cables are retired, PRTC will cease to maintain them and will not offer services over them. As a general matter, the retirement of the Feeder Cables will not result in new charges, terms or conditions for retail customers of PRTC, which will be migrated to like-for-like services over replacement fiber facilities. Impacted customers in locations where PRTC has deployed fiber-to-the-home (“FTTH”) will be served by those fiber facilities, and PRTC will continue to offer the same POTS service over fiber at the same price that it offered prior to the transition to FTTH. PRTC will continue to serve retail customers in locations where it has not deployed FTTH through the existing last-mile copper loops, but it will do so by using existing video-ready access devices (“VRADs”) in those areas, which connect to PRTC central offices by fiber. As such, PRTC does not expect to discontinue any telecommunications services in the impacted areas (other than a limited number of legacy telecommunications services that may be incompatible with FTTH or the use of the VRAD), and will continue to offer the same POTS service that it offered prior to the retirement of the Feeder Cables.

After the Feeder Cables are retired, any copper loops used by interconnected carriers in the locations identified in Exhibit A will be disabled and non-operational. Interconnected carriers currently using such copper loops to provide service to their end-users without impairment should be able to continue using the copper loops until the notice period set forth in section 51.333(b)(2) elapses. If any interconnecting carrier is currently experiencing a service outage to the breakdowns that have impacted the Feeder Cables, PRTC stands ready to work with such a carrier to offer an alternative service until the notice period set forth in section 51.333(b)(2) elapses. PRTC likewise stands ready to work with impacted interconnecting carriers to ease the transition to alternative service offerings due to the retirement of the Feeder Cables. Any services offered to interconnected carriers after the notice period set forth in section 51.333(b)(2) elapses will be subject to the rates, terms, and conditions set forth in the applicable local tariff or PRTC’s Interstate Service Guide under which PRTC offers the service, as applicable.