

PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.333(g)(2)

November 23, 2020

Pursuant to section 51.333(b)(2) and 51.333(g)(2) of the Commission's rules, 47 C.F.R. § 51.333(b)(2); *id.* § 51.333(g)(2), Puerto Rico Telephone Company, Inc. ("PRTC") hereby gives notice of its planned copper retirement within a reduced waiting period of less than ninety days.

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 November 23, 2020

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:

- 19000I142¹
- 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 due to circumstances outside of its control. 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 cable.

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 repairing the Feeder Cables is not viable and that their replacement with fiber facilities is the best

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

course of action to restore service as quickly as possible and avoid future service outages in the impacted locations. PRTC respectfully submits that, under the circumstances, a reduced waiting period is appropriate to move forward immediately with the migration of impacted customers and restore service to affected customers permanently. Given the current impact on customers of PRTC and of interconnecting carriers that are served by the Feeder Cables, moving forward with the replacement and retirement of these copper facilities is the most expedient alternative to restore service to the largest number of customers. Absent the requested relief, PRTC would be required to incur the costs of repairing these legacy facilities and comply with the advance notice and waiting periods, only to then retire and replace it shortly after the expiration of these periods.

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 PRTC customers, 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 customers in locations where PRTC 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. In those instances, PRTC will work with the affected consumers to offer alternatives and will comply with the requirements of section 63.71 of the Commission’s rules, 47 C.F.R. § 63.71, to the extent that any such services are discontinued.

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. PRTC believes that only one interconnecting carrier may be affected by the retirement of the Feeder Cables, and at least some end users of said interconnected carriers are currently experiencing problems with their service due to the damage to the cable. PRTC already has communicated with this interconnecting carrier to provide notice of its decision to retire the Feeder Cables, and it stands ready to communicate and work with any impacted interconnected carrier to ease the transition to alternative service offerings due to the retirement of the Feeder Cables. The resale of telecommunications services under Section 251(a) may be a viable option to restore telecommunications services in the short term. Non-tariffed packet-based services also are available in the impacted locations. Any alternative services offered to interconnected carriers 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.