

## Broadband USA Applications Database

**Applicant Name:** World Data PR

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### Public Notice Submissions

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-----**Service Area:** Guanica SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Guanica SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

Under these circumstances, much more so than on the mainland, the subsidization of a new broadband competitor could undermine the viability of the existing service providers. RUS and NTIA instead should take a hard look at the leading reasons for low levels of broadband adoption in rural Puerto Rico, which would point toward focusing ARRA broadband funding in these markets on sustainability and public computing programs and not on subsidizing additional infrastructure to areas that are not unserved.

Another point of reference regarding the unique nature of Choice's service area, is that household vacancy rates are 21% higher than comparable vacancy rates in the United States. This serves to further decline the potential penetration of broadband service into households, and should be considered against the 40% penetration threshold.

Finally, most of the area has multiple service providers including Choice Cable TV in addition to PRT (DSL service), five wireless carriers with wireless data service and additional ISP providers. All would share a sizeable market presence within the 50% of the homes with computers.

-----**Service Area:** Sabana Grande SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Sabana Grande SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

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Finally, most of the area has multiple service providers including Choice Cable TV in addition to PRT (DSL service), five wireless carriers with wireless data service and additional ISP providers. All would share a sizeable market presence within the 50% of the homes with computers.

-----**Service Area:** Coamo SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Coamo SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

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-----**Service Area:** Maunabo SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Maunabo SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

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Finally, most of the area has multiple service providers including Choice Cable TV in addition to PRT (DSL service), five wireless carriers with wireless data service and additional ISP providers. All would share a sizeable market presence within the 50% of the homes with computers.

-----**Service Area:** Rincon SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Rincon SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

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Finally, most of the area has multiple service providers including Choice Cable TV in addition to PRT (DSL service), five wireless carriers with wireless data service and additional ISP providers. All would share a sizeable market presence within the 50% of the homes with computers.

-----**Service Area:** Yauco SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Yauco SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

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Another point of reference regarding the unique nature of Choice's service area, is that household vacancy rates are 21% higher than comparable vacancy rates in the United States. This serves to further decline the potential penetration of broadband service into households, and should be considered against the 40% penetration threshold.

Finally, most of the area has multiple service providers including Choice Cable TV in addition to PRT (DSL service), five wireless carriers with wireless data service and additional ISP providers. All would share a sizeable market presence within the 50% of the homes with computers.

-----**Service Area:** Patillas SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Patillas SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

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-----**Service Area:** Yabucoa SA

**Submitter:** liberty cablevision

**Comment:** World Data PR's proposed funded service area is not unserved. The proposed funded service area includes all 37 municipalities served by Liberty Cablevision of Puerto Rico (Liberty). Liberty already offers 3+ mbps broadband to its entire footprint in these municipalities.

Underserved metrics in rural Puerto Rico have to take into consideration the fundamentally different nature of this market as it compares to the U.S. mainland. According to the most recent U.S. Census data, the median household income in U.S. mainland is over three (3) times higher than the median household income in the above-mentioned municipalities in Puerto Rico. Liberty's investment of over \$50 million dollars just in the past five years in plant upgrades and Internet backbone capacity to support broadband service of up to 15 mbps, has increased broadband penetration in this area almost tenfold in spite of such poor economic conditions. This is so in spite of the fact the Puerto Rico's geographic location forces ISPs to lease Internet backbone capacity through an ultramarine circuit, which makes broadband more expensive than in the U.S. mainland.

Under these circumstances, much more so than on the mainland, the subsidization of a new broadband competitor could undermine the viability of the existing service providers, which in Liberty's case as a cable operator, naturally intend to upgrade its plant in the future to reach much higher speed capability through already existing technology enhancements. RUS and NTIA instead should take a hard look at the leading reasons for low levels of broadband adoption in rural Puerto Rico, which would point toward focusing ARRA broadband funding in these markets on sustainability and public computing programs and not on subsidizing additional infrastructure to areas that are not unserved.

Finally, World Data PR's project appears to be unsustainable. Most of the area has multiple service providers including Liberty Cablevision of Puerto Rico in addition to PRT (DSL service), five wireless carriers with wireless data service and additional ISP providers. All would share a sizeable market presence within the low percentage of the homes with computers.

-----**Service Area:** Aguadilla SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Aguadilla SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

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-----**Service Area:** Guayanilla SA

**Submitter:** Choice Cable TV

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-----**Service Area:** Aguada SA

**Submitter:** Choice Cable TV

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-----**Service Area:** Mayaguez SA

**Submitter:** Choice Cable TV

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-----**Service Area:** Villalba SA

**Submitter:** Choice Cable TV

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-----**Service Area:** Guayama SA

**Submitter:** Choice Cable TV

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-----**Service Area:** San German SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the San German SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

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-----**Service Area:** Las Marias SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Las Marias SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

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-----**Service Area:** Cabo Rojo SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Cabo Rojo SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

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-----**Service Area:** Ponce SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Ponce SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

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-----**Service Area:** Adjuntas

**Submitter:** Choice Cable TV

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-----**Service Area:** Jayuya SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Jayuya SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

Under these circumstances, much more so than on the mainland, the subsidization of a new broadband competitor could undermine the viability of the existing service providers. RUS and NTIA instead should take a hard look at the leading reasons for low levels of broadband adoption in rural Puerto Rico, which would point toward focusing ARRA broadband funding in these markets on sustainability and public computing programs and not on subsidizing additional infrastructure to areas that are not unserved.

Another point of reference regarding the unique nature of Choice's service area, is that household vacancy rates are 21% higher than comparable vacancy rates in the United States. This serves to further decline the potential penetration of broadband service into households, and should be considered against the 40% penetration threshold.

Finally, most of the area has multiple service providers including Choice Cable TV in addition to PRT (DSL service), five wireless carriers with wireless data service and additional ISP providers. All would share a sizeable market presence within the 50% of the homes with computers.

-----**Service Area:** Hormigueros SA

**Submitter:** Choice Cable TV

**Comment:** World Data PR incorrectly claims that the Hormigueros SA proposed service area is unserved, as Choice Cable TV already offers 3+ mbps broadband to all of this area.

RUS and NTIA should not reflexively apply the same underserved metrics in rural Puerto Rico without at least also considering the fundamentally different nature of the market. The median household income in Choice's service area is one-quarter of the national median, at approximately \$15,000. While its broadband penetration rate trails the mainland United States, it equals the mainland rate from just a short time ago and is increasing quickly. This is a success story on track for greater successes. That success owes in large part to Choice's investment of \$30 million dollars in the past five years to upgrade all of its plant to support broadband service of up to 15 mbps, with its 3 mbps service offered for only \$25.95 and a triple play with broadband, cable and phone for only \$69.90.

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