Applicant Name: UJet Holding B.V.

Public Notice Submissions

----Service Area: Arecibo

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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: San German

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the San German 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: Lares

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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: Ciales

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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: Ceiba

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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: Penuelas

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Penuelas 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: Naguabo

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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: Las Marias
Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Las Marias 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: Corozal
Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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: Camuy
**Submitter:** Liberty Cablevision of Puerto Rico, Ltd.

**Comment:** U-Jet Holding 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, U-Jet Holding 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.

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**Service Area:** Salinas

**Submitter:** Choice Cable TV
Comment: UJet Holding B.V. incorrectly claims that the Salinas 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: Canovanas

Submitter: Liberty Cablevision of Puerto Rico, Ltd.
Comment: U-Jet Holding 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, U-Jet Holding 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: San Isabel

Submitter: Choice Cable TV
Comment: UJet Holding B.V. incorrectly claims that the San Isabel 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: Juana Diaz

Submitter: Choice Cable TV
Comment: UJet Holding B.V. incorrectly claims that the Juana Diaz 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: Rincon

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Rincon 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:  Isabela

Submitter:  Choice Cable TV

Comment:  UJet Holding B.V. incorrectly claims that the Isabela 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:  Morovis

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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: Guayanilla

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Guayanilla 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: Manaubo

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Manaubo 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:  Luquillo

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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: San Sebastian

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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:  Patillas

Submitter:  Choice Cable TV

Comment:  UJet Holding B.V. incorrectly claims that the Patillas 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: Quebradillas

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Quebradillas 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:  Hatillo

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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: Dorado

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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:  Barranquitas

Submitter:  liberty cablevision

Comment:  U-Jet Holding 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, U-Jet Holding 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:  Rio Grande

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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: Jayuya

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Jayuya 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: Las Piedras

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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:  Gurabo

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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:  Veja Baja

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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: Loiza

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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:  Manati

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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: Arroyo

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Arroyo 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: Guanica

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Guanica 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

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Sabana Grande 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: Moca

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Moca 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

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Hormigueros 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:  Fajardo

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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:  Humacao

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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: Lajas

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Lajas 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:  Yabucoa

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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:  Cidra

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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: Yauco

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Yauco 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 underserved.

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: Ponce

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Ponce 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: Coamo

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Coamo 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:  Barceloneta

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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:  Cabo Rojo

Submitter:  Choice Cable TV

Comment:  UJet Holding B.V. incorrectly claims that the Cabo Rojo 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:  Utuado

Submitter:  libert cablevision

Comment:  U-Jet Holding 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, U-Jet Holding 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: Villalba

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Villalba 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: Juncos

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: U-Jet Holding 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, U-Jet Holding 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:  Cayey

Submitter:  Liberty Cablevision of Puerto Rico, Ltd.

Comment:  U-Jet Holding 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, U-Jet Holding 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: Guayama

Submitter: Choice Cable TV

Comment: UJet Holding B.V. incorrectly claims that the Guayama 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 marketpresence within the 50% of the homes with computers.