

Broadband USA Applications Database

Applicant Name: Clear Partner Holdings LLC

Public Notice Submissions

-----**Service Area:** San Juan, PR

Submitter: Centennial Communications Corp

Comment: Clearwire's proposed service area (PSA) is not underserved: it is covered by Centennial's broadband wireless 3G network and its fiber-optic network. Several other wireless carriers, as well as wired providers (PRTC and cable operators) provide broadband service in this area as well. Given the high availability of wireline and wireless broadband services as well as existing market penetration, this PSA is clearly not underserved.

Submitter: Liberty Cablevision of Puerto Rico, Ltd.

Comment: Clear Partner Holdings' proposed funded service area is not unserved. The proposed funded service area includes the municipality of Caguas which is 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 overbuild 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, Clear Partner Holding's project appears to be unsustainable. Most of the area has multiple service providers including Liberty Cablevision of Puerto Rico in addition to PRT (DSL service), five wireless carriers with wireless data service and additional ISP providers. All would share a sizeable market presence within the low percentage of the homes with computers.

Submitter: Puerto Rico Telephone Company, Inc

Comment: Puerto Rico Telephone Company, Inc. ("PRT") provides both wireline and wireless broadband services throughout Puerto Rico. PRT provides digital subscriber line ("DSL") service through its "DMAX" residential and business broadband offerings, which are offered at speeds ranging from 1024 kbps downstream and 512 kbps up to 5 Mbps downstream and 512 kbps up throughout the island. In addition, PRT's third generation UMTS/GSM wireless network serves 65 percent of the population. This network reaches speeds over 1.5 Mbps downstream and 384 kbps upstream. PRT has demonstrated a strong history of broadband investment in Puerto Rico, and it plans to continue to invest in expanding its broadband offerings throughout the island.