

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Response Efforts Undertaken During 2017 Hurricane Season	)	PS Docket No. 17-344
	)	
Bridging the Digital Divide for Low Income Consumers	)	WC Docket No. 17-287
	)	

**COMMENTS OF NATIONAL HISPANIC MEDIA COALITION AND FREE PRESS**

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April 17, 2018

## EXECUTIVE SUMMARY

*Someone living nearby . . . contracted potentially life-threatening leptospirosis but could not seek medical attention from the hospital military ship in port because doing so required a referral, yet there was no way to call or reach his doctors for one.*

~ *Maritza Stanchich in San Juan, Puerto Rico on January 30, 2018*

Widespread communications outages following the 2017 hurricane season continue to have devastating impacts on storm victims. Stories like the one above are likely in the hundreds of thousands, yet few have made their way into this docket.

2017 was one of the most destructive hurricane seasons in U.S. history, with particularly devastating impacts on Puerto Rico and the U.S. Virgin Islands. As the federal agency charged with ensuring access to communications services for all Americans, including people in U.S. territories, the Commission has undertaken some attempts to mitigate the resultant communications crises, but these efforts are inadequate.

National Hispanic Media Coalition and Free Press are pleased that the Commission opened this docket to collect public comment on the effects of these disasters, but the barriers to participation in this proceeding have been far too high. For instance, the Commission closed the public comment period long before basic utilities like water, electricity and communications were restored to storm victims, preventing those with the most at stake from participating in this proceeding. Moreover, the Commission failed to conduct proper outreach in disaster-torn areas. Surprisingly, the Commission failed to publish its request for public comment in Spanish, Puerto Rico's dominant language.

The lack of transparency around the FCC Hurricane Recovery Task Force's activities has been equally regrettable. The public should know what the Task Force is up to, and be permitted to participate and hold the Task Force accountable for its successes and failures.

Following Hurricane Katrina, the Commission initiated an independent panel to review its response efforts. That panel held a field hearing and produced a detailed report. Several notable policy changes occurred in response to the Katrina Report as the Commission pivoted to better protect communications services in future storms and ensure that Katrina victims were able to stay connected in the short term. One such change was expansion of the Lifeline program to ensure that Katrina victims were given a hand up while getting back on their feet.

The current Commission, on the other hand, has proposed severe cuts to Lifeline that would disconnect the Lifeline services of hundreds of thousands of hurricane victims. This is unconscionable.

The Commission must strive to restore communications to disaster zones as expediently as possible. It must ensure that hurricane victims are able to afford those services. And it must deeply analyze and learn from this experience to ensure that it is proactively protecting our communications infrastructure and the people who rely on it for life, health and safety in the face of natural disasters. In particular, the Commission should:

- Host roundtables, field hearings and town hall events in Puerto Rico in collaboration with NGOs, government officials, humanitarian organizations, industry and local media to foster the essential relationships across sectors not only for the recovery from Hurricane Maria, but to build resilience for future crises. These events should be easy for those impacted by the storm to attend and participate in, in terms of language, location, accessibility and other necessary accommodations;
- Create a story collection tool – in English and Spanish – and conduct extensive outreach to ensure that hurricane victims are aware of and utilize the tool. The Commission must properly staff this project with fluent-Spanish speakers, and hire more such employees if

current staff cannot expediently handle incoming Spanish-language complaints, stories and comments;

- Significantly increase transparency around its Hurricane Recovery Task Force and other hurricane response efforts;
- Publish a detailed report with its findings, analysis and recommendations for policy interventions to increase resilience and preparedness for future storms. This report should examine how the hurricanes impacted people in different geographic areas;
- Reopen its field office in San Juan, Puerto Rico; and
- Terminate its Lifeline proceeding.

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**COMMENTS OF NATIONAL HISPANIC MEDIA COALITION AND FREE PRESS**

The National Hispanic Media Coalition (“NHMC”) and Free Press respectfully submit these comments<sup>1</sup> in the above referenced proceeding seeking comment on the Federal Communication Commission’s (“FCC” or “Commission”) response efforts undertaken during and after the 2017 hurricane season.<sup>2</sup> The Commission has taken some steps toward assisting disaster-torn areas, including the opening of this docket, but there is much left to do, especially in Puerto Rico and the U.S. Virgin Islands (“USVI”).<sup>3</sup>

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<sup>1</sup> On December 7, 2017, the Commission released a Public Notice and initially set deadlines of January 22, 2018, for comments, and February 21, 2018, for reply comments in this proceeding. Despite the significant communications disruptions which existed during the entirety of the comment and reply periods, the Commission denied NHMC’s motion for extension of time in this docket. *2017 Hurricane Season*, Order, PS Docket No. 17-344, DA 18-158 (Feb. 16, 2018) (“*2017 Hurricane Season Order*”). In the interest of maximizing public input in the docket from their Puerto Rican constituents and members, NHMC and Free Press are filing this comment after the initial dates for comments and replies. Given the ongoing struggles in Puerto Rico to access basic necessities like food, water, electricity and communications services, NHMC and Free Press urge that further time to comment is merited in this docket.

<sup>2</sup> *Public Safety and Homeland Security Bureau Seeks Comment on Response Efforts Undertaken During 2017 Hurricane Season*, PS Docket No. 17-344, Public Notice, DA 17-1180 at 1 (Dec. 7, 2017) (“*Public Notice*”).

<sup>3</sup> Press Release, Federal Communications Commission, “Chairman Pai Unveils \$924 Million Plan to Restore and Expand Networks in Puerto Rico and U.S. Virgin Islands” (Mar. 6, 2018) (“*March Press Release*”).

The *Public Notice* in the above referenced docket seeks comment “on the resiliency of the communications infrastructure, the effectiveness of emergency communications, and government and industry responses to the 2017 hurricane season.”<sup>4</sup> NHMC and Free Press are concerned about the impact the 2017 hurricane season had and continues to have on the mainland and the U.S. territories, but are especially concerned about the ongoing humanitarian crisis and disruption to communications services impacting Puerto Rico over six months after the last 2017 hurricane hit the island. We submit comments to (1) uplift the voices of some of those who have not been able to submit their own comments, and emphasize the need for the Commission to conduct more targeted outreach in Spanish; (2) highlight the need for greater transparency and accessibility in the Commission’s short- and long-term hurricane recovery work; (3) convey the importance of Lifeline to the low-income and displaced survivors of Hurricane Maria in their recovery; and (4) provide the Commission with specific recommendations, including but not limited to three concrete actions. The Commission should (i) immediately hold a field hearing in Puerto Rico; (ii) immediately conduct more targeted outreach in Spanish; and (iii) issue a report that would analyze possible changes to existing regulations or new regulations needed to ensure that communications do not collapse and are quickly restored to better promote “safety of life and property” in accordance with the Commission’s statutory mandate.<sup>5</sup>

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<sup>4</sup> See *2017 Hurricane Season Order* at 1.

<sup>5</sup> 47 U.S.C. § 151.

**I. THE COMMISSION SHOULD LOWER BARRIERS TO PARTICIPATION IN THIS PROCEEDING**

The barriers to participation in this proceeding have been and remain far too high. The time period provided for comment did not allow for robust public participation from the people most impacted by some of these storms.<sup>6</sup> Moreover, the Commission's failure to publish this *Public Notice* in Spanish, despite continuing to publish Disaster Information Reporting System (or "DIRS") reports in both English and Spanish,<sup>7</sup> has severely limited the participation of Spanish-only and Spanish-dominant Puerto Ricans. The Commission can and must do more to engage with and hear from Puerto Ricans.

By failing to do outreach to the Puerto Rican people in their predominant language, Spanish, the Commission has not only been insensitive and dismissive of the island's rich cultural and linguistic heritage but has failed its statutory mandate in Section 151 of the Communications Act to promote "safety of life and property." This departs from Commission attempts in other outreach efforts to provide at least some consumer information in Spanish and

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<sup>6</sup> See, e.g. Federal Communications Commission, "Communications Status Report for Areas Impacted by Hurricane Maria" (Feb. 21, 2018). In this FCC status report, issued the day that reply comments were due in this docket, the Commission described all 78 counties in Puerto Rico as a "disaster area"; noted that 5.2% of cell sites were out of service; and said that "the FCC has received reports that fairly large percentages of consumers are without either cable services or wireline service."

<sup>7</sup> Compare Federal Communications Commission, "Communications Status Report for Areas Impacted by Hurricane Maria" (Sept. 21, 2017), and Federal Communications Commission, "Informe del estado de las comunicaciones para las áreas afectadas por el huracán María" (Oct. 19, 2017), with Federal Communications Commission, "Communications Status Report for Areas Impacted by Hurricane Irma" (Sept. 18, 2017) (after Hurricane Maria struck Puerto Rico, the Commission eventually recognized the need to issue bilingual status report for those affected by Maria, but did not issue bilingual status reports in the aftermath of Hurricane Irma). Starting September 18, the Commission issued twenty-eight English-language status reports before providing a Spanish language version on October 19, and each report was bilingual thereafter.

other languages.<sup>8</sup> It also runs counter to our country's and Puerto Rico's linguistic and cultural histories and the current linguistic landscape. The U.S. does not have or recognize an "official language." English-only-speakers are 78.9 percent of the country's population. After English, Spanish is the second-most spoken language in the country, with over 13.1 percent of U.S. residents being Spanish-dominant or Spanish-only.<sup>9</sup> Another 8 percent of U.S. residents are dominant in languages other than English.<sup>10</sup>

In contrast, 95.3 percent of households in Puerto Rico speak Spanish,<sup>11</sup> making it the dominant and predominant language on the island. The FCC must provide information and outreach in Spanish and be adequately staffed to support non-English speakers at all times but particularly in times of disaster. Having failed to adequately do so in this docket, it must rectify this immediately in order to adequately fulfill its mandate to safeguard life and property and to help the island be ready for the next hurricane season. Specifically and at a minimum, the Commission must immediately provide a consumer tool for the people of Puerto Rico to submit their comments in Spanish about their experiences during and after the 2017 hurricane season, and invite them to take part in and testify in Spanish at any field hearings the Commission holds

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<sup>8</sup> See, e.g., Federal Communications Commission, "Salud, Seguridad y Emergencias" (last visited Apr. 6, 2018), <https://www.fcc.gov/gu%C3%ADas-para-el-consumidor/salud-seguridad-y-emergencias#block-menu-block-4>; Federal Communications Commission, "Tras las Tormentas: Cuidese de las Estafas" (last visited Apr. 10, 2018), <https://www.fcc.gov/consumers/guides/tras-las-tormentas-cuidese-de-las-estafas>.

<sup>9</sup> See U.S. Census Bureau, Table No. S1601, "Language Spoken at Home" (2012-2016 American Community Survey 5-Year Estimates), [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_16\\_5YR\\_S1601&prodType=table](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_16_5YR_S1601&prodType=table).

<sup>10</sup> See *id.*

<sup>11</sup> See U.S. Census Bureau, Table No. S1602, "Limited English Speaking Households in Puerto Rico" (2012-2016 American Community Survey 5-Year Estimates), [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_16\\_5YR\\_S1602&prodType=table](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_16_5YR_S1602&prodType=table) (emphasis added).

on the island or elsewhere. Spanish language comments and testimony should be incorporated in this docket and also translated, so they can be easily accessible in the record for Commissioners, staff, and other non-Spanish speakers.

In the absence of adequate FCC outreach NHMC and Free Press invited their members and the public to weigh in about the subject matter of this docket through a public comment collection tool on the Free Press website. Their Spanish-language outreach began on April 12, 2018,<sup>12</sup> to ensure that Spanish-only and Spanish-dominant people can be heard about this matter. Beginning on January 29, 2018, Free Press reached out to its members and asked: “What’s your story about the impact Hurricane Maria has had on Puerto Ricans’ ability to access communications services?”<sup>13</sup> As of today, despite the extreme hardships facing many Puerto Ricans and their lack of access to basic necessities including communications services, many have sent feedback through this tool with the hope that the FCC will hear and heed their concerns.<sup>14</sup> We provide here a sampling of those informative and moving comments, and provide all of them in Appendix A to this filing.

For instance, Sandralis Rivera in Woodland Park, New Jersey, said on January 31, 2018:

My grandfather died 4 days after the hurricane hit [Puerto Rico] . . . . We weren't able to find out about his death until 3 days later in a brief 3 min. phone call. The lack of service had us extremely concern[ed] over the welfare of my grandmother who was in an elderly home without any power nor access to cell service. It took

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<sup>12</sup> See Free Press, “Cuenta su historia: La FCC necesita saber sobre el impacto del huracán María en los servicios de comunicación en Puerto Rico” (last visited Apr. 16, 2018), [https://act.freepress.net/act/internet\\_fcc\\_pr\\_spanish/](https://act.freepress.net/act/internet_fcc_pr_spanish/).

<sup>13</sup> See Free Press, “Tell Your Story: The FCC Needs to Know about the Impact of Hurricane Maria on Communications Services in Puerto Rico” (last visited Mar. 6, 2018), [http://act.freepress.net/letter/internet\\_fcc\\_pr/](http://act.freepress.net/letter/internet_fcc_pr/).

<sup>14</sup> See App A. We attach these stories to this filing, and also submit them separately into the docket. Free Press will continue to collect stories to share with the Commission over the next several months so that those whose hardships do not allow them to weigh in at this time can be heard.

at least 3 weeks before I was able to speak to my in-laws and my cousins. Up until last week, when I visited [Puerto Rico] I experienced several dropped calls and no internet[.]

Tragically, this story is not rare.<sup>15</sup> Many commenters noted in January that they had only recently gotten back reliable communications services — over four months after Hurricane Maria struck. In a familiar refrain, many tales of uncertainty and heart-wrenching silence from loved ones came to the fore as power and service were slowly restored and some survivors were finally able to speak for themselves by submitting their stories through this comment tool. One commenter noted the difficulty caused by the timing and conduct of this proceeding:

How can the FCC possibly ask for comments regarding the impact of Hurricane Maria on Puerto Rico when the many of citizens of the island still remain without power or internet[?] Is the FCC actually going the [ ] island and knocking on doors? Is the FCC going to drop fliers on the island that citizens can mail back to them?<sup>16</sup>

Although Chairman Pai<sup>17</sup> and Commissioner Rosenworcel<sup>18</sup> have visited Puerto Rico, the Commission can and must do more. The FCC should hold field hearings in the most affected areas on the island and solicit public feedback in person,<sup>19</sup> as well as make a concerted effort through targeted public outreach to elicit comments from those most impacted through

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<sup>15</sup> See Frances Robles, Kenan Davis, Sheri Fink & Sarah Almukhtar, “Official Toll in Puerto Rico: 64. Actual Deaths May Be 1,052.,” *N.Y. Times* (Dec. 9, 2017).

<sup>16</sup> Comment of Michael Brossi, Framingham, Mass. (Feb. 1, 2018).

<sup>17</sup> See Press Release, Federal Communications Commission, “FCC Chairman Announces Visit to Puerto Rico & U.S. Virgin Islands in March” (Feb. 21, 2018) (“February Visit Press Release”). The Chairman has visited Puerto Rico twice since September 2017, first between November 5-6, 2017 and again on March 7-10, 2018. Note that the consumer stories excerpted below were submitted between these visits and the Commission could have heard these stories and others for itself had it held field hearings during these visits.

<sup>18</sup> See Commissioner Jessica Rosenworcel (@JRosenworcel), Twitter (Mar. 5, 2018, 5:41 PM), <https://twitter.com/JRosenworcel/status/970791553252798464>.

<sup>19</sup> See *infra* Section IV.

roundtables and town hall events.<sup>20</sup> Gathering data on past response efforts and preparing for upcoming hurricane seasons is especially important, given the catastrophic 2017 Atlantic hurricane season, which was “extraordinary by any standard, with a total of 17 named storms, including 10 hurricanes--six of which were classified as major storms, measuring Category 3-5 on the Saffir-Simpson Wind Scale.”<sup>21</sup> It was “one of the most devastating Atlantic hurricane seasons of all times”<sup>22</sup> and “a top-10 hurricane season by most metrics.”<sup>23</sup> September was a particularly active month breaking “the Atlantic calendar month record for named storm days, hurricane days, major hurricane days and Accumulated Cyclone Energy (ACE).”<sup>24</sup> And when Hurricane Maria made landfall on September 20, 2017, it was the strongest hurricane to strike Puerto Rico since 1928.<sup>25</sup> A recent forecast of the 2018 hurricane season already predicts a slightly above average season, with seven storms expected to become hurricanes and three to become major hurricanes.<sup>26</sup>

The Commission has the opportunity to amass a record which can sustain significant “enhancements”<sup>27</sup> to its recovery efforts, and to the performance of the agency’s mandate to

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<sup>20</sup> *See infra id.*

<sup>21</sup> Philip J. Klotzbach, “2017 Atlantic Hurricane Season in Review: One for the Record Books” (Nov. 30, 2017), <http://www.iii.org/insuranceindustryblog/?p=5628>.

<sup>22</sup> *Id.*

<sup>23</sup> Kevin Loria, “The ‘extremely active’ 2017 hurricane season is finally over — here are the insane records it set” (Nov. 30, 2017), <http://www.businessinsider.com/atlantic-hurricane-season-records-2017-11>.

<sup>24</sup> Philip J. Klotzbach, “2017 Atlantic Hurricane Season in Review: One for the Record Books” (Nov. 30, 2017), <http://www.iii.org/insuranceindustryblog/?p=5628>.

<sup>25</sup> *See id.*

<sup>26</sup> *See* Vanessa Romo, “2018 Hurricane Season Will Bring Another Battery Of Storms,” *NPR* (April 6, 2018, 5:48 PM), <https://www.npr.org/sections/thetwo-way/2018/04/06/600193418/2018-hurricane-season-will-bring-another-battery-of-storms>.

<sup>27</sup> *See* 2017 Hurricane Season Order at 1.

ensure resilient communications systems in the pending 2018 hurricane season and others to come.

**A. Comments from Puerto Rico Demonstrate Need for Further FCC Learning in Puerto Rico**

NHMC and Free Press's outreach does not relieve the Commission of the obligation to do more and learn from the people it serves. But the comments we collected tell a powerful narrative about the hardships suffered by people disconnected from their communications services and from each other in the wake of the storms. Even a small sampling of these stories paints a vivid picture.

- Patricia in Bayamon, Puerto Rico (Jan. 31, 2018):

Communication was down for weeks, making it hard for everyone to stay sane, calm, and collected. Thus [ ] our mental health decreased, worse than what it already was. . . My boyfriend's family still does not have home internet access thanks to the hurricane. Many areas that provide internet (theirs being Claro, the telephone company) were severely damaged thanks to water coming in the central buildings.

- Michael Slayder in Luquillo, Puerto Rico (Jan. 29, 2018):

Ever since the Hurricane hit us I wasn't able to contact my friends for about two weeks before my parents took a very long trip to the center of the island which was crowded with cars and people where a few stores had signal for everyone to communicate with, I got in contact with my friends from the US but I haven't heard anything from the ones here in Puerto Rico due to school being closed and me not knowing where they live.

- Luis Lugo in Adjuntas, Puerto Rico (Feb. 12, 2018):

As of today, the AT&T tower has not been replaced or rebuilt, leaving us with a mediocre service. However, last weekend there was a service outage with one of Claro's fiber-optic cable, leaving all Claro customers in Adjuntas without phone or internet service until today. I feel that the telecommunication companies have left the people in the mountain area behind. My parents had AT&T postpaid accounts. One of the numbers was transferred to Claro and the other was not paid because of the lack of service from AT&T, who refused to give us a fourth month of credit (emphasis added).

- Hector Santana in Carolina, Puerto Rico (Jan. 31, 2018):

In the beginning of the hurricane the hospital my mom worked at was filled with people who were on the floor crying over the fact that their homes were more than likely destroyed and that their families were still in their homes and no way of being able to contact them.

- Maria Colon in San Juan, Puerto Rico (Feb. 2, 2018):

I live in the San Juan metropolitan area. My mother lives on the west side of the island. I was not able to communicate with her for 5 days. I couldn't access any reception and her land line was completely out of service. Due to lack of gas and road obstructions I couldn't get to her. I [must] say those were the most difficult days since she is elderly and depends on the phone to let her needs known. Finally, I was able to go see her in person (emphasis added).

When I go visit her, as of today, the communications are difficult and at times I need to go out of my community to get reception. It is extremely urgent and important that the FCC investigates and reassured the Puerto Ricans, USA citizens, that this will never happen again (emphasis added).

- Otoniel Cajigas in Aguada, Puerto Rico (Jan. 29, 2018):

On September 19, 2017 my family [and] I were about to go sleep knowing that early in the mornings we will begin to feel the impact of the hurricane Maria at our home in Bo Espinal, Aguada, PR. To our surprise before any wind or rain began there was a power outage (which later we lived [through] for 75 straight days), which caused that around 2 or 3 am we end up without any broadband internet access at our home (ISP Liberty Cable), but at least we still had the cellphone. [ ] [H]owever around 4:30 [or] 5:00 am we also [lost] any cellular signal from our provider (AT&T and Tmobile). At this point we decided to try capturing local channels, however none were available, therefore we tried the radio . . . none FM radio was available in the spectrum, so we switched to AM. finally we were able to locate one local radio station: 1340AM. Unfortunately, even while they were trying to provide information to the audience, they were blind as well. no information was received from any government agency, neither status of the Hurricane and how much additional time we should expect to receive [the] impact (emphasis added).

[A]t around 7:00AM of September 21st we wake up to our new reality, no running water, no electricity, but worse than that No communications at all . . . basically it passed 1 week before we heard that the communications provider Claro had part of their cell towers working, therefore we looked for people with their service to load a cell phone in order to communicate with our family members out in US mainland. AT&T cellular signal took almost a month to begin working for calls and SMS, however [ ] data service wasn't available until 6 weeks, but very unstable and extremely slow (emphasis added).

3 months later the service [stabilized] and was near to normal, however broadband service for home wasn't available. Finally, on day 75 our neighborhood was re-energized, therefore I began contacting Liberty to get estimates on when should I get the service back, but there weren't any estimates given. Finally, last week, January 23, 2018 the [fiber] cable was installed at the neighborhood, however my coax cable from the fiber to my home was cut, so I contacted Liberty to get it replaced. I have contacted them more than 5 times and thru all possible channels however I'm still without the service and they aren't even providing any installation date. So this is a summary of our story so far . . . (emphasis added).

- Sheila Ward in San Juan, Puerto Rico (Jan. 31, 2018):

We did not have electricity at our house in San Juan until January 11. Therefore, our access to our landline telephone service was limited. Concerning the cell phone, it was about 10 days before I could talk well with my husband. I was off island and he was in PR for Hurricane Maria.

- Maritza Stanchich in San Juan, Puerto Rico (Jan. 31, 2018):

For me, not having any cell phone connection or access to internet in the immediate aftermath of the storm was worse than not having electricity or water service. We had little idea what had happened in the rest of the country, as only one radio station was left operating (WAPA).

Once I managed to get hold of a newspaper (by driving about half an hour to the newspaper with a friend), I learned that the mayors and authorities of five municipalities of the country's southwest had achieved no contact with the governor or emergency officials, this [was] five-six days after the storm.

In addition, I knew personally of someone living nearby who contracted potentially life-threatening leptospirosis but could not seek medical attention from the hospital military ship in port because doing so required a referral, yet there was no way to call or reach his doctors for one.

- Gerardo Talavera in Brookline, Massachusetts (Jan. 29, 2018):

It was me and my uncle putting our phones outside, against anything we thought could work as an antenna. No service for days, no reliable service for weeks. It was an absolute nightmare to let everyone know we were OK. Communication was at such a premium that when PREPA offered an internet 'oasis' it was flooded with people trying to get on WiFi. Such things should never happen again (emphasis added).

## B. Lack of Connectivity in Puerto Rico Also Harmed People on the U.S. Mainland

People on the U.S. mainland with friends and family in Puerto Rico were also negatively impacted by the communications blackout. Here are some of their comments:

- Sonia Acevedo in Alexandria, Virginia (Feb. 12, 2018):

Most of my family lives in the [ ] southeast of the Island, to be exact in the town next to where the hurricane Maria landfall. It wasn't until 12 days after Maria[ ] that I was able to talk with my mom. She had to drive at least 30-40 min far from my town, park in the shoulder of a highway to be able to talk with me and my sister. The 10 min or so that last the call it was very difficult to understand what she was saying because the signal was bad. It wasn't until a week later that I was able to talk with her again. I went to the Island [in the beginning] of November and I had no signal all the time. Almost 5 months after the hurricane communications still bad. I used to talk with my parents almost every day. Now if we are lucky, we talk twice a week. People in Puerto Rico pay a lot for cellphone and internet, they are US Citizens, they deserve to be treated the same way [as] the people that live in the US mainland (emphasis added).

- Ahmad Moradi in Fort Lauderdale, Florida (Jan. 30, 2018):

As an Expat who lives in PR, communication is vital to our business operation. We cannot conduct business when struggle continues with lack of power, Internet, and other related services.

- “N. L.” in Long Grove, Illinois (Jan. 30, 2018):

Six months following Hurricane Maria and we still are not able to directly communicate with our friends in parts of the mainland and Vieques[.]

- Magdaliz Figueroa in Silver Spring, Maryland (Feb. 11, 2018):

My immediate family, my parents, my mom and sister had phone signal on and off during the whole ordeal they live in Bayaman . . . and I am more than thankful for that because I will have gone crazy if I wouldn't have listen from them for 14 or 20 days like it happened to so many of my friends here.

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My friend decided to go stay with her parents in her hometown of Cidra[.] They didn't have any radio or cellphone signal [and] didn't know what was happening . . . . [W]ith no communications they couldn't know if the hurricane passed or if it was still there (emphasis added).

[T]he death toll of the aftermath of the hurricane is more [than] 1,000 people[.] [T]he mayor of Orocovis walked for a day or more with a corpse just to be able to get signal on a cellphone [for the corpse to] be pick[ed] up. There are thousands of stories like the ones I just wrote here. Still to this day there're people without power, water and phone signal[.] [I]t's been 5 months, and all I can think is that the 2018 hurricane season will start in a few months.

- Sandra Wilkes in Perth Amboy, New Jersey (Jan. 29, 2018):

It took two whole weeks to try to communicate with my parents. Those two weeks were heart wrenching not knowing if my parents were safe as [images] of devastation were spreading. They couldn't use their cellphone because the cell towers were down and landlines were destroyed.

- Clarinda Low in New York City, New York (Feb. 2, 2018):

For several people I know, even in San Juan, internet services have been very spotty at best. Because phone service is even worse, this has interrupted every aspect of life. Professors are unable to communicate with students, parents unable to communicate with their children[']s] schools, information flow in general has come to a standstill (emphasis added).

- Marta Landrieu in New York City, New York (Jan. 30, 2018):

My family, sister, cousins [and] other close relatives live in Patillas and Guayama areas [most devastated] by Maria. Today, months after Maria most are still without electricity and no access [to] the internet. . . . One cousin, [struggling with] multiple cancers, was unable to reach anyone nor use the internet to receive updated information/news as to her town's condition and for information on the distribution of needed water, food that would reach her remote area. FEMA irresponsibly was/is asking folks to file their claims on the internet and was closing its doors to those who were unable to do so.

## **II. THE COMMISSION SHOULD COMMIT TO GREATER TRANSPARENCY AND PUBLIC DISCLOSURES REGARDING ITS SHORT- AND LONG-TERM HURRICANE RECOVERY WORK**

The Commission's total lack of transparency around its much-vaunted Hurricane Recovery Task Force ("Task Force") has been yet another barrier preventing Puerto Ricans and

the public at large from engaging with the FCC.<sup>28</sup> According to FCC news releases, the Task Force is comprised of FCC staff but it is unknown whether Puerto Rican residents and public interest voices are or were consulted or represented.<sup>29</sup> The public can only glean information on the Task Force's few actions in passing mentions,<sup>30</sup> but more detailed information is not available, making it impossible for the public to know what those actions are let alone assess whether the actions are adequate. The public does not know how often the Task Force meets; how many times it has traveled to Puerto Rico beyond accompanying the Chairman in his recent visit to the island;<sup>31</sup> what work it has done and whom it met when on the island. Simply put, the public has not a clue about the Task Force's priorities or focus areas, beyond a general directive to aid recovery, and thus the public cannot engage with or provide feedback to address Puerto Rico's needs. The Commission should immediately make the work of this Task Force public and transparent so that the communities in Puerto Rico can engage and participate in their own recovery.

Because of the lack of transparency, commenters do not know what fact-finding or questioning the Commission has done, if any, into assessing its own response to Hurricane Maria. Yet the Commission has ample models for doing so, from past experiences. Following

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<sup>28</sup> See Chairman Ajit Pai, Federal Communications Commission, Remarks Before the National Association of Broadcasters, *Eye of the Storm: Broadcasters' Role in Emergencies* (Jan. 18, 2018) ("Pai NAB Remarks"); see also Press Release, Federal Communications Commission, "FCC Chair Announces Hurricane Recovery Task Force" (Oct. 6, 2017). The only named member of the Task Force is the chair, Michael Carowitz, the Chairman's Special Counsel, and it is otherwise "comprised of representatives from bureaus and offices throughout the agency."

<sup>29</sup> See February Visit Press Release ("[t]he Chairman will be accompanied by members of the Commission's Hurricane Recovery Task Force.").

<sup>30</sup> See Pai NAB Remarks ("we continue to monitor and support communications service restoration where possible through our [Task Force].").

<sup>31</sup> See February Visit Press Release.

Hurricane Katrina, the Commission under President George W. Bush convened a panel to independently assess the Commission’s response.<sup>32</sup> That panel held a field hearing in the affected area<sup>33</sup> and produced a detailed report.<sup>34</sup> The FCC’s response to Hurricane Sandy provides the Commission with yet another model. The Commission under President Barack H. Obama both took immediate action and conducted field hearings three months after Sandy’s landfall.<sup>35</sup> Yet this Commission, despite witnessing the most widespread communications outages in modern history, has failed to conduct one single field hearing. The Commission now has an opportunity to determine whether its present work could build upon the Katrina and Sandy panels’ work and to assess whether the FCC’s response to the 2017 hurricanes successfully applied in Puerto Rico the lessons learned from those evaluations under prior administrations.

Prior Commission hurricane responses suggest that the Commission here can and should do much more. Weeks after Hurricane Maria’s landfall, the Commission voted to advance Universal Service Fund (“USF”) disbursements for recovery work.<sup>36</sup> The Chairman thanked his “colleagues for agreeing to adopt this order so quickly” and added that “what’s needed to help

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<sup>32</sup> See generally *Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks*, EB Docket No. 06-119, Order, 22 FCC Rcd 10541 (2007) (“*Hurricane Katrina Recommendations*”).

<sup>33</sup> See *FCC’s Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks Announces Next Meeting Scheduled for Monday, March 6, 2006 at the Mississippi e-Center at Jackson State University in Jackson, Mississippi*, Public Notice, DA 06-371 (Feb. 17, 2006).

<sup>34</sup> See generally *Hurricane Katrina Recommendations*.

<sup>35</sup> See *FCC Announces Date and Location for the First Post-Superstorm Sandy Field Hearing*, Public Notice, DA 13-19 (Jan. 8, 2013). Superstorm Sandy made landfall late-October and the Commission held field hearings in New York and New Jersey three months later on February 5, 2013.

<sup>36</sup> *Connect America Fund*, WC Docket No. 10-90, Order, 32 FCC Rcd 7981, 7988 (2017) (statement of Chairman Ajit Pai) (“*Connect America Fund Hurricane Order*”).

the people of Puerto Rico and the U.S. Virgin Islands right now is action, not a hearing or a report.”<sup>37</sup> In response, Commissioner Rosenworcel predicted:

[t]he road to recovery is long. That is why I have called on this Commission to commit to both hold hearings as soon as feasible and issue a full report on this hurricane season and its impact on communications. The Commission took similar action following Hurricane Katrina and Hurricane Sandy. It boggles my mind that we cannot commit to the same course here.<sup>38</sup>

We agree. Further, we welcome and encourage the Commission’s continued engagement. The Chairman’s proposal for a \$750 million allocation toward restoring and expanding communications networks in Puerto Rico<sup>39</sup> and recent visit<sup>40</sup> are positive steps. Regrettably, the Chairman’s March 2018 visit to Puerto Rico did not include a single field hearing or an opportunity for public comment.<sup>41</sup> Short-term actions by the Commission must also be accompanied with a systematic and coordinated effort that also engages the public in the affected areas and enables the affected communities to continuously inform the Commission’s efforts going forward. Most importantly, all of those efforts must ensure that the island’s telecommunications are more resilient to the next hurricane and that proper emergency communication systems are in place.

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<sup>37</sup> *Id.*

<sup>38</sup> *Id.* at 7992 (statement of Commissioner Jessica Rosenworcel).

<sup>39</sup> *See* March Press Release.

<sup>40</sup> *See* February Visit Press Release.

<sup>41</sup> *See id.*

### III. HURRICANE RELIEF EFFORTS ARE INEXORABLY LINKED TO THE MAINTENANCE OF THE CURRENT LIFELINE PROGRAM

In this docket the Commission must consider the enormous impact that the proposed changes to Lifeline<sup>42</sup> could have on the individuals who rely on the program for their vital communications needs and, in particular, the millions of Americans in Puerto Rico and the USVI still reeling from the 2017 hurricane season. As this Commission itself has recognized and acted upon,<sup>43</sup> USF advanced disbursements are a necessary and integral part of post-hurricane disaster relief and rebuilding efforts.<sup>44</sup> One of the four USF programs, Lifeline, is specially situated to ensure that low-income families are connected to communication services necessary to access emergency services.<sup>45</sup> For example, in the aftermath of Hurricane Katrina in 2005, the Commission expanded the Lifeline program to better serve those displaced by the storm. The Commission must continue to adhere to its congressional mandate to ensure that “[c]onsumers in all regions of the Nation, including low-income consumers . . . have access to telecommunications and information services.”<sup>46</sup> Yet, the current Commission’s proposed changes to Lifeline directly contravene this mandate and stand in sharp contrast to the Commission’s efforts to assist hurricane victims after Katrina over a decade ago.

The Commission’s expansion of Lifeline after Hurricane Katrina should inform the current Commission’s actions. Then as now, Lifeline remains an indispensable tool for disaster

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<sup>42</sup> See generally *Bridging the Digital Divide for Low-Income Consumers et al.*, WC Docket Nos. 17-287 *et al.*, Notice of Proposed Rulemaking, 32 FCC Rcd 10475 (2017).

<sup>43</sup> See *Connect America Fund Hurricane Order* at 7988.

<sup>44</sup> See *Federal-State Joint Board on Universal Service, et al.*, CC Docket No. 96-45 *et al.*, Order, 20 FCC Rcd 16883 (2005) (“2005 USF Order”).

<sup>45</sup> 2005 USF Order ¶ 15 (“Hurricane victims need access telephone service, particularly in . . . emergency situation[s]”).

<sup>46</sup> 47 U.S.C. § 254(b)(3) (emphasis added).

victims, both in relief efforts for hurricanes that have already happened and in preparation for and recovery from future storms. While assisting with disaster relief efforts in 2005, the Commission “work[ed] within the parameters of the program rules to ensure that victims . . . continue[d] to have access to telecommunications services and advanced telecommunications services necessary for recovery and restoration from the catastrophic damage.”<sup>47</sup> The 2005 Commission adopted temporary rules for USF programs, and noted that modifications to Lifeline were necessary “to improve the effectiveness of the low-income support mechanism at meeting the needs of victims[.]”<sup>48</sup> At the time, Katrina was considered the “worst natural disaster this country has faced”<sup>49</sup> having knocked out more than 3 million customer phone lines in Louisiana, Mississippi, and Alabama.<sup>50</sup> Taking ownership over this issue, the Commission stated that “[u]nless addressed, this lack of access to telecommunications will lengthen the already-long period of time anticipated for recovery from the damage caused by Hurricane Katrina.”<sup>51</sup>

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<sup>47</sup> 2005 USF Order ¶ 4.

<sup>48</sup> *Id.* ¶ 8.

<sup>49</sup> *Id.*

<sup>50</sup> See Written Statement of Kenneth P. Moran, Director, Office of Homeland Security, Enforcement Bureau, Federal Communications Commission, Before the United States House of Representatives Committee on Energy and Commerce, On Hurricane Katrina, at 2-3 (Sept. 7, 2005). By comparison, more than 3.3 million people in Puerto Rico found themselves in areas affected by Hurricane Maria. The Commission’s second status report indicated 95.4% of cell sites were out of service, “large percentages of consumers are without either cable services or wireline service (one company reported that 100% of its consumers are out of service due to lack of commercial power),” and “at least 10 switches [ ] are out of service due to either SS7 or toll isolation.” Based on this evidence, it appears that the impact on communications services for consumers in the aftermath of Maria bear striking similarity to Katrina. See Hurricane Maria Federal Communications Commission, Communications Status Report for Areas Impacted by Hurricane Maria (Sept. 22, 2017).

<sup>51</sup> 2005 USF Order ¶ 8.

Affordability of communications services has been and still remains a key component of achieving universal service; and Lifeline is the only federal program that directly mitigates the high-cost of these services within households.<sup>52</sup> When Katrina displaced entire communities from their homes, the Commission issued temporary waivers to expand the Lifeline program.<sup>53</sup> The waivers provided “support for a free wireless handset, a package of at least 300 minutes to use, not to exceed \$130 per household, until March 1, 2006.”<sup>54</sup> Although this relief ran for a five-month period, the Commission nonetheless understood it was essential to “help consumers reconnect to the telecommunications network as the disaster-struck areas [were] rebuilt,”<sup>55</sup> with the intent of providing support specifically to “assist hurricane victims, regardless of whether they are in an intact household, separated from family temporarily, or otherwise.”<sup>56</sup> The Commission made other temporary changes as well, which included expanding eligibility of Lifeline and Link-Up support to persons approved for FEMA disaster assistance;<sup>57</sup> and establishing an alternate and streamlined designation process for temporary Eligible Telecommunications Carriers (“ETCs”).<sup>58</sup> The Commission stressed the necessity of this temporary support for wireless service “not only to assist in the recovery from the economic damages caused by the hurricane, but [to] promote public safety by ensuring that disaster victims have ready access to E911 capabilities in the event of an emergency.”<sup>59</sup>

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<sup>52</sup> *See id.* ¶ 10.

<sup>53</sup> *See id.* ¶ 11.

<sup>54</sup> *Id.* (internal citations omitted).

<sup>55</sup> *Id.* ¶ 12.

<sup>56</sup> *Id.*

<sup>57</sup> *Id.* ¶ 17.

<sup>58</sup> *See id.* ¶¶ 19-20.

<sup>59</sup> *Id.* ¶ 24.

On October 6, 2017, NHMC and Free Press, along with other allies, raised several concerns about the devastating impact of the 2017 hurricane season on the communications infrastructure in Puerto Rico and the USVI.<sup>60</sup> These concerns persist six months later and have grown with the proposed restructuring of the Lifeline program. The Commission itself recognized the “extraordinary property damage, personal injury, and disruptions in services caused by the [h]urricanes . . . [that] constitutes extremely unusual circumstances warranting the temporary waiver of the rules and procedures.”<sup>61</sup> Therefore, it is shocking that the Commission has proposed these extreme and unnecessary changes to the Lifeline program, under aggressive deadlines, in the midst of an ongoing humanitarian crisis.

The Lifeline proposals would cut off hundreds of thousands of individuals in hurricane-stricken areas.<sup>62</sup> For example, Puerto Rico has 506,025 households subscribed to Lifeline, a 60 percent participation rate, based on the eligible population. If the Commission implements a ban on non-facilities-based providers, then it could potentially disconnect 75 percent of Lifeline recipients on the island,<sup>63</sup> for a total of 379,519 households. This would bring certain hardship to those still struggling to return to normalcy. Further, although this change would cause particular hardship in the context of Puerto Rico post-Maria, the implications are wide ranging. In Texas,

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<sup>60</sup> See Letter from National Hispanic Media Coalition, Center for Media Justice, Color Of Change, Free Press, and Public Knowledge to Chairman Ajit Pai (Oct. 6, 2017).

<sup>61</sup> *Schools and Libraries Universal Service Support Mechanism, et al.*, CC Docket No. 02-6 *et al.*, Order, 32 FCC Rcd 7456, 7458 (Wireline Comp. Bur. 2017) (internal citations omitted).

<sup>62</sup> See App. C (providing an overview of Lifeline offerings in Puerto Rico).

<sup>63</sup> See National Consumer Law Center, “A Lifeline that Breaks Down Barriers to Affordable Communications, Puerto Rico” (last visited Feb. 21, 2018), <https://www.nclc.org/images/pdf/take-action/lifeline/fact-sheets/PR-LL.pdf>.

647,671 households subscribe to Lifeline, and 67 percent would be cut-off from service,<sup>64</sup> for an approximate total of 433,940 households. Florida has the highest number of households subscribed to Lifeline at 1,073,751.<sup>65</sup> Without non-facilities-based providers, about 71 percent of those households would lose service, approximately 762,363 Floridian households. Taken together, in only these three examples, removing non-facilities-based providers would impact 1.5 million households in need of Lifeline service in areas that were hit by devastating hurricanes in just the past year.

As the Commission looks to ensure robust access to communications in the coming hurricane season, the proposed changes to the Lifeline program are counterproductive to the Commission's efforts to assist hurricane survivors and they fly in the face of its congressional mandate to ensure universal service. Fulfilling the goals of this *Public Notice* demands that the Commission account for the role of Lifeline and then abandon its Lifeline proposals that would harm survivors of the 2017 hurricane season<sup>66</sup> and endanger their ability to connect during the 2018 season.

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<sup>64</sup> See National Consumer Law Center, "A Lifeline that Breaks Down Barriers to Affordable Communications, Texas" (last visited Feb. 21, 2018), <https://www.nclc.org/images/pdf/take-action/lifeline/fact-sheets/TX-LL.pdf>.

<sup>65</sup> See National Consumer Law Center, "A Lifeline that Breaks Down Barriers to Affordable Communications, Florida" (last visited Feb. 21, 2018), <https://www.nclc.org/images/pdf/take-action/lifeline/fact-sheets/FL-LL.pdf>.

<sup>66</sup> See Nicole Goodkind, "New FCC Policy Would Be a 'Death Sentence' for Puerto Ricans Recovering from Hurricanes Maria and Irma," *Newsweek* (Apr. 5, 2018, 6:30 AM), <http://www.newsweek.com/puerto-rico-lifeline-poverty-lifeline-fcc-trump-872545> (quoting Luis Belén, CEO of National Health IT Collaborative for the Underserved, describing the proposed changes to Lifeline as a "'death sentence' for vulnerable Americans" because "Lifeline is a tool that is utilized to alert and communicate with underserved communities in times of disaster" and "to take care of their basic needs").

**IV. THE COMMISSION SHOULD INCREASE PUBLIC ENGAGEMENT, IMPROVE TRANSPARENCY, HOLD A FIELD HEARING, PUBLISH A REPORT, UTILIZE THE LIFELINE PROGRAM, AND REOPEN THE FCC FIELD OFFICE IN SAN JUAN, PUERTO RICO**

The Commission can, and should, take several concrete steps to learn about and improve its response efforts for future disasters. NHMC and Free Press agree with Internews, an international non-profit organization whose mission is to empower local media worldwide. That organization issued a report from Puerto Rico in November 2017 and recommended the organization of “roundtables and town hall events between NGOs, government officials, humanitarian organizations and local media,” to foster the essential relationships “across sectors not only for the recovery of Hurricane Maria, but to build resilience for future crises.”<sup>67</sup> With the 2018 hurricane season upon us the Commission must do more to assist Puerto Rico by reaching out directly to Puerto Ricans, including by holding field hearings, conducting a thorough investigation and analysis of how the telecommunications networks performed during and after the hurricanes, and taking every step necessary — from determining best practices to conducting rulemakings — to ensure that Puerto Rico and other hurricane-prone areas are better prepared in the future.

**A. The FCC Must Create a Story Collection Tool and Conduct Direct Outreach to Puerto Ricans in Both English and Spanish and Employ More Spanish-Fluent Staff at the FCC’s Headquarters**

The Commission should open up a story collection tool asking Puerto Ricans to share their feedback about their user experience before and after the hurricanes struck. It also must ensure that the stories thus collected, detailing the challenges and needs of the people and areas

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<sup>67</sup> Justin Auciello, Jesse Hardman, & Carolyn Powers, Internews, “Getting Connected: An Assessment of Information Needs in Puerto Rico after Hurricane Maria” (2017).

most impacted by the storms, are incorporated into the record of this proceeding. To do so, the Commission must expand its engagement with the people of Puerto Rico, and take into account that Spanish is the dominant language on the island and that information and outreach must be provided and collected in Spanish. Only then can the Commission truly fulfill its core mandate

to make available, so far as possible, to all people of the United States, without discrimination on the basis of race, color, religion, national origin, or sex, a rapid, efficient, Nation-wide . . . wire and radio communication service with adequate facilities . . . for the purpose of promoting safety of life and property through the use of wire and radio communications.<sup>68</sup>

Accordingly, ensuring that all materials related to this proceeding (including the *Public Notice*) are translated into Spanish would be an important step in directly engaging with Puerto Ricans.

Additionally, the Commission must ensure that it has sufficient staff in place to provide assistance to the public before and after hurricane landfalls. And that should include having sufficient staff fluent in Spanish both in Puerto Rico and at the FCC headquarters, ready to assist the Spanish-dominant speakers comprising over 13 percent of the U.S. population, and the predominantly Spanish-speaking Puerto Ricans on the island.

**B. The FCC Must Hold Field Hearings in Puerto Rico to Hear Directly from Puerto Ricans in Their Respective Communities**

The Commission must hold a field hearings, town halls, and roundtables in Puerto Rico to hear directly from Puerto Ricans in their respective communities. It must listen to how the extraordinary hurricanes and the collapse of the communications systems upended the lives of people on the island from all walks of life. It must also directly hear from parents, young professionals, senior citizens, people with disabilities, local governments, hospitals and medical professionals, emergency workers, teachers, social workers, businesses big and small, local

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<sup>68</sup> 47 U.S.C. § 151 (emphasis added).

governments, and community leaders and volunteers, in addition to hearing from the communications industry. Not only does the Commission’s public safety and public interest mandate require it, but the Commission would be richly informed by hearing directly from the people who lived through Maria.<sup>69</sup> Further, learning what worked and did not work directly from impacted individuals and communities would help ensure that relief efforts are better tailored to work in the event that there is another total collapse of the communications system, especially when matched with an understanding of the Commission’s own data on broadband deployment in Puerto Rico.<sup>70</sup> It also would allow those whom the recovery efforts are directed towards to have some say in their implementation. The Commission should provide sufficient translation services at these hearings to ensure that everyone can be heard.

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<sup>69</sup> See e.g., U.S. Gov’t Accountability Off., GAO-18-198, “FCC Should Improve Monitoring of Industry Efforts to Strengthen Wireless Network Resiliency” 36 (2017) (recommending FCC Chairman “should develop a plan to monitor the outputs and outcomes of the Wireless Network Resiliency Cooperative Framework and document the results of its monitoring to evaluate its effectiveness and identify whether changes are needed.”). We also note that this kind of engagement with consumers informs the Commission’s implementation of the consumer readiness and preparation element under the Wireless Network Resiliency Cooperative Framework.

<sup>70</sup> See App. B. Free Press analyzed FCC Form 477 deployment data to determine the state of fixed-terrestrial broadband deployment in Puerto Rico. Our analysis shows that Puerto Rico’s fixed broadband access market mirrors that seen at the national level: a cable-telco duopoly that covers most of the urban population, and a large proportion of the rural population with notable gaps. Puerto Rico’s telephone company ISP (Claro, formerly called Puerto Rico Telephone Company) – like all other telephone company ISPs – continue to lag behind its cable company competitor (Liberty) in terms of transmission speeds, but is slowly narrowing the gap. This gap is due to the far higher costs of upgrading telephone company networks compared to cable networks. It will continue to narrow in urban areas, though at an uncertain pace. While the FCC does not collect pricing data, other research indicates that weak-duopoly competition results in artificially high prices and other suboptimal outcomes in areas such as customer service and innovation.

**C. The Commission Should Use This Record And Complete Additional Research to Issue a Comprehensive and Thorough Report on the Impact and Lessons Learned from the 2017 Hurricane Season, and Provide Specific Regulatory Recommendations to Ensure the Resiliency of Communications During and Following Natural Disasters**

The Commission should use this record to issue a comprehensive and thorough report on the impact of, and lessons learned from, the 2017 hurricane season. The FCC's report should also:

- (1) address the impact of the storms on the island's infrastructure;
- (2) analyze the effectiveness of government and industry efforts to restore communications;
- (3) assess its own recovery response to the island after Hurricane Maria made landfall;
- (4) make specific regulatory recommendations to ensure the resiliency of the communications networks the next time a Category 4 or 5 hurricane hits;
- (5) analyze and evaluate what measures must be in place to keep communications intact if the power grid were to collapse; and
- (6) devise an extended contingency plan, especially since power has yet to be fully restored to Puerto Rico over six months after Hurricane Maria.

The report must also factor in the additional challenges posed to relief and recovery when disasters strike U.S. territories or states outside the mainland. Such information will better inform a Commission evaluation of steps needed to ensure that people in U.S. territories and non-contiguous states are provided the same access to communications services, as well as the same restoration and disaster response times that people have come to expect on the U.S. mainland.

The Commission must also begin to publicly answer these questions among others:

- (1) Did and does the FCC have adequate plans in place to render assistance to Puerto Rico and to other island territories in the aftermath of Hurricanes Maria and Irma and in the event of future storms?
- (2) Did those plans include how to ensure that island territories had a least bare bones emergency communications networks?
- (3) Given that Puerto Rico's FCC field office and ten others were set to close in January 2017,<sup>71</sup> how did the lack of on-the-ground FCC personnel impact the FCC's response to recovery efforts in Puerto Rico and the nearby U.S. Virgin Islands?
- (4) How many FCC staff were first deployed to Puerto Rico, and when did they arrive? What levels of staff are currently there?
- (5) Were and are staff deployed to the island fluent in Spanish?
- (6) Given the continuing impact of the 2017 Hurricane season and the projections for above-normal active future hurricane seasons, should the FCC reopen a field office in Puerto Rico to better "safeguard life and property"?<sup>72</sup>
- (7) Are the reporting requirements on the operational status of the networks adequate to assess not only the status of recovery but also the future measures needed to ensure a more robust and resilient communications network? For example, the FCC kept and keeps records of cell tower outages throughout the island, but there

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<sup>71</sup> See *Reorganization of the Enforcement Bureau's Field Operations*, Order, 30 FCC Rcd 7649 (2015) (closing the San Juan field office).

<sup>72</sup> See, e.g., "Pai May Reopen San Juan FCC Field Office to Aid Puerto Rico," Inside Radio (Nov. 8, 2017), [http://www.insideradio.com/free/pai-may-reopen-san-juan-fcc-field-office-to-aid/article\\_95363096-c45b-11e7-a625-a73bf06d33b9.html](http://www.insideradio.com/free/pai-may-reopen-san-juan-fcc-field-office-to-aid/article_95363096-c45b-11e7-a625-a73bf06d33b9.html).

is no breakdown on whether outages were caused by structural damage to the towers, power outages, or lack of sufficient backup power. In addition, there was little or no reporting on the status of the landline networks or the cable systems, beyond the FCC stating it had “received reports that large percentages of consumers are without either cable services or wireline service (one company reported that 100% of its consumers are out of service due to lack of commercial power).”<sup>73</sup>

- (8) The Commission should collect and analyze data for patterns of service restoration across geographic regions. Further, the Commission should also examine the restoration of landline and mobile connectivity across the island, and whether areas still remain without connectivity. Such an analysis would inform the Commission's priorities in current and future resource allocation and restoration efforts. If the Commission discovers disparities in restoration across geographic regions, then it could use this data to form reasoned guidance for communications providers and, as necessary, regulations to address any inequities.

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<sup>73</sup> Federal Communications Commission, *Communications Status Report for Areas Impacted by Hurricane Maria* (Sept. 22, 2017).

**D. The Commission Must Abandon Its Lifeline Proposals Given the Devastating Impact on Puerto Ricans and Other Victims of the 2017 Hurricane Season**

The Commission’s Lifeline proposals are “particularly cruel given the unprecedented devastation and disruption”<sup>74</sup> that the 2017 hurricane season already brought to Puerto Ricans impacted by the storm. As Puerto Ricans and other Americans anxiously await the 2018 hurricane season they need to be reassured that they will continue to have affordable access to vital communications services and the ability to communicate with emergency responders and their loved ones when another hurricane strikes.

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<sup>74</sup> Letter from 18MillionRising.org, Access Humboldt, American Library Association, Appalshop, Inc., Asian Americans Advancing Justice – AAJC, Benton Foundation, Center for Media Justice, Center for Rural Strategies, Color Of Change, Common Cause, Common Sense Kids Action, Communications Workers of America, CREDO, Ellis Jacobs, Attorney for the Greater Edgemont Community Coalition of Dayton Ohio, EveryoneOne, Free Press, Janice Meyers Educational Consulting, LLC, NAACP, National Association of Broadcast Employees and Technicians – CWA, National Congress of America Indians, National Consumer Law Center, on behalf of its low-income clients, National Hispanic Media Coalition, New America’s Open Technology Institute, OCA – Asian Pacific American Advocates, Public Knowledge, The Greenlining Institute, United Church of Christ, OC Inc., X-Lab to The Honorable Ajit Pai, Chairman, *et al.*, WC Docket Nos. 17-287 *et al.*, at 2 (Nov. 8, 2017).



## **Appendix A: Consumer Comments**



Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: PS Docket No. 17-344, In the Matter of Response Efforts Undertaken During 2017 Hurricane Season & WC Docket No. 17-287, In the Matter of Bridging the Digital Divide for Low Income Consumers

Dear Ms. Dortch,

Enclosed please find the comments and stories of 149 Free Press members about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services.

Last September, Hurricane Maria devastated Puerto Rico, which is home to close to 3.5 million people.

The ability to communicate during a disaster is a life-and-death issue. But the hurricane destroyed Puerto Rico's infrastructure, leaving the island without power and phone service, and damaging 95 percent of all cell towers.

Now, more than six months later, between **7–9 percent of the island's households are still without power**, there are still areas without cellphone service, and **many households** are without home internet.

It's critical for the FCC to hear from and listen to the Puerto Rican community on the impact Hurricane Maria has had on their ability to access communications services — and how this has affected their lives.

Thank you for your time and consideration.

Best,

Joseph Torres  
Senior Director of Strategy and Engagement  
Free Press

Test

—Lucia A Martinez, Washington, DC

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Logan Welde, Philadelphia, PA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Ricky Tran, Kenilworth, NJ

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Mara Cohen, Skokie, IL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Tsee Lee, New York, NY

It was me and my uncle putting our phones outside, against anything we thought could work as an antenna. No service for days, no reliable service for weeks. It was an absolute nightmare to let everyone know we were ok. Communication was at such a premium that when PREPA offered an internet 'oasis' it was flooded with people trying to get on WiFi. Such things should never happen again.

—Gerardo Talavera, Brookline, MA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Jack Polonka, Peekskill, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Nicolas Marc-Andrew Paredes, Parlin, NJ

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Jenette D'Alessandro, Whitestone, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Erika Parsons, SHERBORN, MA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services? It took two whole weeks to try to communicate with my parents. Those two weeks were heart wrenching not knowing if my parents were safe as images of devastation were spreading. They couldn't use their cellphone because the cell towers were down and landlines were destroyed.

—Sandra Wilkes, Perth Amboy, NJ

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Paul Wilfrid Riley, Sparta Township, NJ

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Ben Pianka, Wilton, CT

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Jo Ann R Potashnick, Chicago, IL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services? can not contact family and friends

—Pat Martinez, ronkonkoma, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Javier Rivera, Brooklyn, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Ryan Griffin, Park Ridge, NJ

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Stephanie Helfgott, Ledgewood, NJ

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Jamilah Elder, New York, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Ivan Fuentes, Orlando, FL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—R Vázquez, San Juan, PR

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Chris peplinski, Middle Village, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Justin Lyga, Morris, CT

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services? There is a disturbing pattern here. From Houston to PR, we are seeing that the Trump agenda does NOT include helping anybody. I guess this falls under the heading of "winning". Trump said in an interview that we appreciate people "winning". Ummm. So how do people affected by Nature even get a chance to "win"? I feel that under Trump, the entire concept of what America is all about has come under fire. from healthcare to storms, Trump is not caring. And since Trump expects support from the NRA, he is not even addressing the problem of excessive gun violence. But then you have the FCC. So is it now that the FCC is also a political organization???? The FCC is failing the American public on net neutrality, so are you now going to fail PR as well?

—Randy Juras, Homer Glen, IL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—C T, Chicago, IL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Efrain Sanchez, Hormigueros, PR

Ever since the Hurricane hit us I wasn't able to contact my friends for about two weeks before my parents took a very long trip to the center of the island which was crowded with cars and people where a few stores had signal for everyone to communicate with, I got in contact with my friends from the US but I haven't heard anything from the ones here in Puerto Rico due to school being closed and me not knowing where they live

—Michael Slayder, Luquillo, PR

On September 19, 2017 my family and I were about to go to sleep knowing that early in the mornings we will begin to feel the impact of the hurricane Maria at our home in Bo Espinal, Aguada, PR. To our surprise before any wind or rain began there was a power outage (which latter we lived for 75 straight days), which caused that around 2 or 3 am we end up without any broadband internet access at our home (ISP Liberty Cable), but at least we still had the cellphone.. however around 4:30 pm 5:00 am we also lose any cellular signal from our provider (AT&T and Tmobile). At this point we decided to try capturing local channels, however none were available, therefore we tried the radio... none FM radio was available in the spectrum, so we switched to AM.. finally we were able to locate one local radio station: 1340AM. Unfortunately even while they were trying to provide information to the audience, they were blind as well.. no information was received from any government agency, neither status of the Hurricane and how much additional time we should expect to receive the impact. Finally at around 7:00AM of September 21st we wake up to our new reality, no running water, no electricity, but worst than that No communications at all... basically it passed 1 week before we heard that the communications provider Claro had part of their cell towers working, therefore we looked for people with their service to load a cell phone in order to communicate with our family members out in US mainland. AT&T cellular signal took almost a month to begin working for calls and sms, however no data service wasn't available until 6 weeks, but very unstable and extremely slow. Finally 3 months later the service stabilize and was near to normal, however broadband service for home wasn't available. Finally on day 75 our neighborhood was re-energized, therefore I began contacting Liberty to get estimates on when should I get the service back, but there weren't any estimates given. Finally last week, January 23, 2018 the fiber cable was installed at the neighborhood, however my coax cable from the fiber to my home was cut, so I contacted Liberty to get it replaced. I Have contacted them more than 5 times and thru all possible channels however I'm still without the service and they aren't even providing any installation date. So this is a summary of our story so far...

—Otoniel Cajigas, Aguada, PR

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Joseph Lawson, New York, NY

Now, nearly six months after the hurricane, nearly half of the population of Puerto Rico is still without power and close to 10 percent of the island's cellphone towers still haven't been repaired.<sup>3</sup> In addition, home internet services have yet to be restored to at least a third of the island.<sup>4</sup> It's unacceptable that this kind of neglect could happen in this country. But the slow pace of recovery, especially in rural areas, is directly tied to racism and the island's colonial status.

—Michael Rosen, Evanston, IL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services? My really experience after the hurricane is first our electricity was shut down almost 4 hours before the hurricane, most of the jobs was closed because they didn't have generators to run their business and just layoff most of their workers. I was having a job until October 29, 2017 in a Central Monitoring Station for a Security Company named Genesis Security in Carolina, Puerto Rico, at least I was having a job but they close my area and left us (other 4 coworkers and me) without a job. I wasnt find canned food, meats or vegetables in a healthy stage, because many of them still in the small deli shops for weeks or I cant find an open supermarket close to the house except, Sam's and I need to take and uber expending almost \$10 for each way, because public transportation wasnt work until a month and a half after the hurricane. I didn't received any visit from FEMA in my house to make an inspection or either my mom, family or friends, we didn't received any kind of money like they used to told in the news or almost they told us about \$500 in miscelaneous help, but us didnt received anything. I apply to FEMA in Oct 2nd 2017, and after that one of my brothers outside the island, in Chicopee, MA, talk to me and offer the opportunity to come here with my son, I accepted leaving there my mom, and sisters to help them little by little to survive, establish them to come here, I know isnt easy but most of my family still without electricity. I came to MA in November 09,2017 and after November 26, 2017 I received an email from FEMA told me that my application was withdraw without do an inspection, ask me for papers or take the pics and documents I upload in the page, THEY LIE TO US! Told us that they going to help, but they don't, people are dying because the hunger and low living environment in some of the cities of the island. FEMA says they cant do too much because the government didn't declare Puerto Rico 100% devastated as they saw in every and each video the people upload or the press in the internet. I want my Island back, I want my people well like they entitled to be, like and US CITIZEN LIKE OURS BIRTH CERTIFICATE SAID! We entitled to live like humans, receive help like Florida, Texas and even like Haiti receive help a few years ago, this is an entire Monopoly just for the American Debt, they talk about Puerto Rican's debt but Florida and California have more debts than every part of the world and USA congress still help them because they are US citizens, we are a commonwealth like MA, but wasnt our chose, Puerto Rico was invaded by USA and since 1917 Puerto Rico sends more soldiers to war than any state conjugated to another. It's time to said "O'er the land of the free and the Home of the Brave" My story is in beloved of myself, my son Khaled Escobar and: Antonia Perez Echevarria, Nadya Andino Perez, Barbara Andino Perez, Samuel Perez Perez, Pedro Malcum Llanos Perez, Luz C. Perez, Juan Perez, Angel Monje, Jeanette Martinez, Robert Martinez, Dareck McClearen, Yelitza Tejada, Damari Rivera, Janeiry Limas, Jose Ramos, Josue Rios, Bryan Bruno, Manuel Perez, Leilani Perez, Sandra Perez, Natachka Rivera, Jacinta Perez, Johnathan Ortiz, Johaydan Ortiz, Victor Ortiz, Stephanie Calo, Sarai Malave, Rosemary Medina, Kevinyoan Lugo, Amir Lugo, Santiago Carrasquillo, Eli Rojas, Natanael De La Paz, Jose Annexy, Felix Velez, Jorge Valentin, Jose Lugo, Jose Nieves, Angel De Jesús, etc. For those who cant speak in my letter at the same time but be represented by myself. Thanks, Karla Andino k.a.andino.p@gmail.com

—Karla A Andino Perez, Chicopee, MA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services? I myself am Puerto Rican & Greek. I have family & friends who live in Puerto Rico. It disgusts me what this so called Clown of President has done. It's the saddest thing I've seen this is a Scam where this current administration is trying to profit for their own benefit to get rich. While putting many at risk at losing everything they work so had for! Do not pass this Scam Tax or Repeal our health, social security. If you want to make America Great then do something for the People not Coporate companies. You are putting Lives at Risk. It's sad to see someone who claims they are sucessful to go around being Bitter from something that happened in your past, possible starts from you mom who wasn't always present in your life doesn't give you the right to destroy other lives! The whole Trump Administration Should be ashmed of themselves Playing with People's Lives. They have gone over board Corrupt Criminals in the White House. Never have seen such Discusting acts! For those who Discriminate they should reverse rolls an live the lives of the ones they discriminate see if they like being treated that way!

—Elena Belias, Queens, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Richard Gray, Chicago, IL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Michael Balsai, Philadelphia, PA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Brian Chapman, Chicago, IL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Robert Jack Burton, Fowler, CA

In the beginning of the hurricane the hospital my mom worked at was filled with people who were on the floor crying over the fact that their homes were more than likely destroyed and that theyre families were still in their homes and no way of being able to contact them.

—Hector Santana, Carolina, PR

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Steven Nasta, New City, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Charles Davis, Trenton, NJ

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services? Six months following Hurricane Maria and we still are not able to directly communicate with our friends in parts of the mainland and Vieques; This country is our responsibility. If not for the ignorance of the current acting administration- their lack of premium response, their political games, their obvious racism- these troubling times in Puerto Rico would be so much further along in repair and assistance, and recognized as they should: As an undeniable top priority and responsibility.

—N L, Long Grove, IL

My family, sister, cousins other close relatives live in Patillas and Guayama areas mosts devastated by Maria. Today, months after Maria most are still without electricity and no access the internet. The despair, including no water, prompted them to call upon me to book flights out of their beloved homes, country. Their sufferings is/was indescribable. One cousin, who is struggling w multiple cancers was unable to reach anyone nor use the internet to receive updated information/news as to her town's condition and for information on the distribution of needed water, food that would reach her remote area. FEMA irresponsibly was/is asking folks to file their claims on the internet and was closing its doors to those who were unable to do so. Eleven family members are still outside their beloved isla and familiar surroundings....and still without electricity or access to the internet. Shameful!!!

—Ms. Marta Garcia Landrieu, NY, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Liliana Donchik Belkin, Brooklyn, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Susanna Levin, New Rochelle, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Melissa Hickey, Aibonito, PR

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Barrett Goldflies, Chicago, IL

We did not have electricity at our house in San Juan until January 11. Therefore our access to our landline telephone service was limited. Concerning the cell phone, it was about 10 days before I could talk well with my husband. I was off island and he was in PR for Hurricane Maria.

—Sheila Ward, San Juan, PR

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Brian Fink, Philadelphia, PA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Michele Temple, Woodside, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services? For me, not having any cell phone connection or access to internet in the immediate aftermath of the storm was worse than not having electricity or water service. We had little idea what had happened in the rest of the country, as only one radio station was left operating (WAPA). Once I managed to get hold of a newspaper (by driving about half an hour to the newspaper with a friend), I learned that the mayors and authorities of five municipalities of the country's southwest had achieved no contact with the governor or emergency officials, this five-six days after the storm. In addition, I knew personally of someone living nearby who contracted potentially life-threatening leptospirosis but could not seek medical attention from the hospital military ship in port because doing so required a referral, yet there was no way to call or reach his doctors for one. While the focus has been on the lack of electricity and the dysfunction of the public sector and neglected electrical grid, little has been said of this systemic failure of the private sector.

—Maritza Stanchich, San Juan, PR

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Bernard J Graczyk, Chicago, IL

I cannot believe that FEMA and the administration have all but abandoned our fellow citizens in Puerto Rico. What is wrong with you?

—Louise R Fitzgerald, New York, NY

its unfair and biased to see so many of the contiguous states receive immediate relief in times of disaster and a national embarrassment when areas such as Puerto Rico stagnate.

—Jenny, Lansdale, PA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—C P., Hamilton, NJ

Dear FCC Staff: I hate to be a spoiler but by dragging your feel in helping Puerto Rico in terms of fixing up the island and an island that would be very valuable in our search to replenish our fish supply being on the water why the constant delay in fixing up the island from Hurricane Maria is a disgrace. What we have so many projects ahead of Puerto Rico that we just had no time to go down and help the islanders fix up their properties are we just not sure of Puerto Rico and other islands off the US Coastline are independent of us. I hate to guide you in the right direction but Puerto Rico citizens and constituents are just as valuable as our own American citizens and they are suffering very hard from the Hurricanes that hit the island and had to make do with what ever rebuilding they needed they had to do for themselves are we starting to categorize which peoples are Americans and which are not. The island of Puerto Rico much like the countries of England and Ireland do alot of importing not much is done for farming or a building industry there are more women than men who will go to the island and help reset up the shops that use to be in the shopping district. Has this country gone mad!!! All for us none for you!!! I had a fear that the generation behind me would do something like this because they were so hard headed that they could never be put in a precarious situation in the diet they are use to eating and have to fend for themselves. It sounds to me that instead of being self reliant and independent that is no longer the case. We must look out for one another and help each other the best we can. We all have varied skills but when used together we could fend for ourselves. IF we wait from the US Government to bail us out we would be worse than when we started. We must share our talents and skills and different immigrants retrieve food and water and other nutrients this will be a long time suffering otherwise but by looking to each other for help and resources we will survive this awful situation. We must lean on one another for support and for being able to obtain food and other materials with which to improve our situation. Waiting on any major government to come to our aid could be eternity and elderly and children are first to feel the suffering other's of us can learn from the elderly to fend for ourselves and make do for a serious situation. Possibly setting up a trade situation with countries that are not as affected by Natures destruction can lend us a helping hand,

—Judy Wisboro, worcester, MA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Jim Lacey, Lowell, MA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Kimi Brooks Wei, Fair Lawn, NJ

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Meredith Kent-Berman, New York, NY

As an Expat who lives in PR, communication is vital to our business operation. We cannot conduct business when struggle continues with lack of power, Internet, and other related services. Visit Ground Zero and live for a week with No Supply. You will learn how difficult life can be.

—Ahmad Moradi, Fort Lauderdale, FL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Ellen Rice, Sunderland, MA

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Nancy Chismar, Edison, NJ

Your help is urgently needed on Puerto Rico. Please act immediately and decisively.

—Roger Newell, Brooklyn NY 11215, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Abrar Qureshi, Willowbrook, IL

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Arlene Davila, NY, NY

ALTHOUGH I THANKFULLY HAVE NOT BEEN AFFECTED IN ANY WAY BY HURRICANE MARIA AS I LIVE IN BROOKLYN, NEW YORK, I NEVERTHELESS FEEL AND ALWAYS WILL THAT EVERYONE WHO HAS HAD THE MISFORTUNE OF BEING AFFECTED BY ANY NATURAL DISASTER SUCH AS A HURRICANE, TORNADO OR EARTHQUAKE MUST HAVE THE FEDERAL, STATE AND LOCAL AGENCIES DO ALL THAT THEY CAN TO HELP THE VICTIMS OF THESE SAID HURRICANES, TORNADOES AND EARTHQUAKES FOR AS LONG AS THESE FEDERAL, STATE AND LOCAL AGENCIES ARE AROUND FOR ALWAYS!!!

—Joyce Shiffrin, brooklyn, NY

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Carole Osborn, Winsted, CT

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Richard Beaulieu, Plantation, FL

These folks' lives and health are in jeopardy. They need any help we can provide. Communications are critical. We can do so much better than this.

—D Hof, North Canaan, CT

As many know, María struck us hard (emphasis on hard). My home area suffered tons of damages, and that includes my own home. I had 7 pine trees in front of my home (I live in the countryside) and one of them got torn in half and landed against my windows, shattering all of them in the area and the gate that was attached to them. We reached out to FEMA for financial aid and they said no because we still haven't fully paid our house. Communication was down for weeks, making it hard for everyone to stay sane, calm, and collected. Thus why our mental health decreased, worse than what it already was. My boyfriend's family still does not have home internet access thanks to the hurricane. Many areas that provide internet (theirs being Claro, the telephone company) were severely damaged thanks to water coming in the central buildings.

—Patricia, Bayamon, PR

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services? My grandfather died 4 days after the hurricane hit PR. He was at DAMAS hospital in Ponce. Not only did they lose power but they had little resources available to feed and medicate patients. We weren't able to find out about his death until 3 days later in a brief 3 min. Phone call. The lack of service had us extremely concerned over the welfare of my grandmother who was in an elderly home without any power nor access to cell service. It took at least 3 weeks before I was able to speak to my in-laws and my cousins. Up until last week, when I visited PR I experienced several dropped calls and no internet connection even through my own data provider Verizon which became Claro.

—Sandra Rivera, Woodland park, NJ

What's your story about the impact Hurricane Maria has had on Puerto Ricans' ability to access communications services?

—Luisa P, Miami Beach, FL

Being the king in Earthling, studying, in the art of living, teaches compassion further. Might might make right, but, it always makes wrong, fraternity rules. The intellect can't lead, for the life doesn't follow. The illimitable, indivisible you, walking in nature's balance, giving back to nature's abundance, knows that and all; you can be-free. If "...we(e),...", don't exercise responsibility, it's Siamese twin sister, freedom, will wither like an unused muscle as well. Just say "no" to the ban and wall, our grandparents were all immigrants; compliance is suicide- we are defiance. If you're not taking bullets you're making them. All life are needed threads in the fabric of life, "...we(e),...", can't allow to be torn asunder. reality

—James M Nordlund, Moorhead, MN

My name is Erika. I'm twenty one years old. Hurricane Maria was... catastrophic. I was with my family in Arecibo, PR. We lived in the Parcelas Rodriguez Olmo (for those who live there or know the area, you know that this area is a zone where with a bit of rain, the streets turn into rivers). At first, it was coming like the usual. Winds, heavy rain, and windows flapping up and down. We were thinking like this time it would pass like in Hurricane Jose. We were wrong. The eye was passing by. A total silence. But it was the type of silence where it was so uncomfortable. Then the neighbor started screaming "WATER IS COMING!" My sister and aunt looked out the window and water came roaring into the Parcelas Rodriguez Olmo. We all started scrambling and grabbing our things. It was so nerve wrecking. I took my grandfather upstairs, he was so nervous that his eyes were red. Then the pets (sadly, one died... RIP Muñeca), then everybody else ran up the stairs. I have this thing that I count time quite well. I counted how long it would take for the water to rise from when we realized it to when we got up to safety. It took 4 minutes for the water to take over downstairs. Have you ever felt winds pushing you so hard you felt like you were walking against a wall? That is how it felt (I forgot to mention that to go upstairs, it was going outside). We were all huddled upstairs. Windows sounding like they were going to rip off, our garage zincs were ripped off, the outside curtains ripped off. Now, looking out the window, the water kept rising, and rising. We literally looked like we were in a bowl of cereal or a cup of water (I have photos and videos, I would gladly share if you ask). After awhile, it stopped rising, it slowed down a bit and started to go low. It took a couple of hours before it completely went. Days passed, no electricity, no water. People were starting to lose it. People started to break in other people's houses. Lots were in watch, observing every move you did. Some even started killing each other for generators. It was very rough. Anything not in a can was no good. After a week is when suddenly there was phone service. Very weak, but it worked just enough to send a message or two to family to say you were alive. This is just the short version of it. There is much more detail but I guess those were the points you guys needed.

—Erika Figueroa, Arecibo, PR

I have friends with immediate family still living in Puerto Rico living further in the interior of the island, still without power or access to communication. They feel neglected, unheard, and simply forgotten. I am appalled we would treat a US territory in this manner, with US agencies more in a hurry to sever all ties with the island than to see more minimal functions returned. FEMA is a case in point. Thank you for your time. Doug Herren

—Doug Herren, Philadelphia, PA

(This is from my brother from a while ago. These issues are still prevalent.) I'm finally in the states so now I have the luxury of electricity and internet for a week. I just want to give a narrative of the past 76 days since the storm. Hurricane Maria 3 in the morning. Howling winds roaring through the dead of night. Windows and doors vibrating violently. Complete darkness. With every few minutes came a whistling. Then came the reality of the plus 200 mph winds smashing against the windows and doors as if a SWAT team were trying to gain entry. 'Stay away from the windows', my mind told me, so I moved to the only room with only one window. Just my dog and I trying to ride out the storm. Stupid me. I thought this was the hurricane, but the eye was yet to come. At 5 in the morning, I felt and heard the full brunt of the storm. The SWAT team had called for backup. There were tanks now smashing against the house. All I could think of were my children. They were staying at my other house. My worrying about them was draining me of any common sense. I longed to go see them, but that was impossible. The tanks continued to pound away for 2 hours until the storm came back to it's original form. The eye was gone, but the storm was still there. 1 in the afternoon. The wind subsided enough to go check the damage, but it would have to be quickly. The gusts were still coming. People would come out and then have to go running back in. The devastation was heart wrenching. People asking others if everyone was alright. Satellite dishes hovering in the sky held down by video cables. Houses with no roofs. Trees down. No electricity. No water. No cell phone service. No internet. No landlines. No communication with the outside world. We were on our own. Roads were impassible. The storm continued for another 14 hours. All we could do is wait it out and hope for the best. Recovery would take a all hands on effort tomorrow. Thursday morning. We gathered all the guys together. Gathered machetes, gloves, power saws and started grouping together in small brigades. We desperately needed to clear these roads in order to get people to the hospital if needed. Those who owned diggers and small bulldozers came out to help. What we didn't realize was how difficult this task would be. You see the storm disheveled the environment. The bees were now homeless. Who ever said that the bee population was dwindling didn't see the thousands out in full force. Over a dozen bee stings hurts. I can give testimony to that. But we kept going. I had to see if my kids were alright. Friday morning. I jumped into my car and worked my way through the obstacle courses that used to be roads. Driving under electrical cables, under dangling electrical poles, through floods, around fallen trees. Driving by houses that were utterly destroyed. I arrived at the other house and my kids were safe. Shook up, but ok. I went back to my neighborhood to get back to work. Aftermath. If you had no cash, you couldn't buy anything. If you had cash, there were very few stores that opened their doors for anyone to purchase anything. ATMs didn't work, Credit cards were useless. Gas stations were closed. Schools were now shelters. The rain continued for over 2 months. When the water returned, you had to wash your clothes by hand and hang them to dry inside the house. There was no sun to help you. When the banks finally started to open, the lines were hours long and there were limits to how much you could withdraw. Gasoline lines stretched for almost a mile and that was rationed to \$15 per person. Lines for ice were very long and the amount was rationed. If you were one of the lucky ones to get a bag. No outgoing flights for those who had the means to leave. Pharmacies had no way of filling prescriptions so you had to pay full price for medications and look to be reimbursed later by your insurance company. Everything was cash only. Destroyed furniture was taken out to the street along with spoiled food. To get an ambulance, someone had to drive all the way to town to get one in person. The morgue was packed. No refrigeration, so the dead were buried quickly. Most couldn't hold on in time for the ambulance. A neighbor was stabbed in the chest during a fight and there was no way of getting him help in time. Tempers were flaring. A dry state and curfew were declared, but there was no way of enforcing them. Even the cops had no gasoline to fuel up. Intersections were warzones. No traffic lights or traffic enforcement. You slept 12 to 13 hours a day. No need to stay up once the sun went down. Depression was setting in. Thousands of business' were closed Shopping malls were deserted. Once supermarkets started opening, there was no meat. Canned foods were rationed. Water company and electric company workers were changing out of their uniforms while off duty due to the hostility of the people. People with breathing problems like asthma or sleep apnea had no way to turn on their respiratory machines. Suicides skyrocketed. The electric company was rummaging through the remains to recover what connectors or transformers they could save due to the lack of supplies. Theives broke into houses where the owners had escaped the storm so the storm and stole everything. Lower lined areas had homes completely flooded. Those that were a bit higher up could not leave their homes due to the flooding surrounding them. Conclusion. A lot of these things are still happening today. 76 days later.

—Martin Jimenez, Philadelphia, PA

Cell towers as well as Internet service needs to be immediately restored everywhere in Puerto Rico. There been enough time so this delay is unacceptable!

—D K, NYC, NY

How can the FCC possibly ask for comments regarding the impact of Hurricane Maria on Puerto Rico when the many of citizens of the island still remain without power or internet. Is the FCC actually going to the island and knocking on doors? Is the FCC going to drop fliers on the island that citizens can mail back to them? This is another joke? Please enlighten me - Michael Brossi.

—Michael Brossi, Framingham, MA

family and friends are suffering in Puerto Rico without electricity and communications! America needs to step up ASAP and help our territories when disasters happen. this needs to be done immediately and is a black mark on FCC and this administration. The lack of response has been totally unacceptable and Americans are ashamed of this inaction!

—D Burn, spring city, PA

To: U.S. Federal Commission of Communications(F.C.C.): After Hurricane Maria, almost five months later the shape of the communications market in Puerto Rico has also been devastated, and the future is still obscure. About 70% of the residents in Puerto Rico are lacking of electric power and it will not be completed until JUNE, 2018. On this, the Telephone services market are rolling down the road, and the Tax cuts reform will add a big burden to the American Companies that are still in the Island of Puerto Rico, and will be charged as companies in a foreign country, because the political condition of Puerto Rico, as a "Colony". Colony means, a country without political power to have the right in the Congress to vote. Also means, having no political power to decide whether or not, Puerto Rico can make direct commercial trades with other foreign countries unless it is approved by the U.S. Congress. As the F.C.C. can see now, Puerto Rico is a colony of the United States of America, that has been put in a political "parking lot" and this is it. So, now the full responsibility does not rely on the colonial residents of Puerto Rico, but in the U.S. Congress, who are our "Colonizers"! Thank you!

—William G Gonzalez, Suffern, NY

For several people I know, even in San Juan, internet services have been very spotty at best. Because phone service is even worse, this has interrupted every aspect of life. Professors are unable to communicate with students, parents unable to communicate with their childrens' schools, information flow in general has come to a standstill. Please address this dire and ongoing crisis.

—Clarinda Mac Low, New York, NY

Although the communications infrastructure collapsed, the FCC should pay more attention and resources to the collapse of the Public Safety/Security radio communications collapse. All response agencies lost all available communications. They had to rely strictly on Ham radio operators. All public security operators were incommunicated to respond to even minor incidents after the hurricane. There are many first responders that do not have access to radio and use their cell phones for response.

—Jeff Q. Diaz, San Juan, PR

I haven't had personal experience of the devastation in Puerto Rico, but I have friends who have family there who are suffering greatly. The handling of this natural disaster by the trump administration is detestable. As a matter of fact, I'd expect this treatment only by the governments of "shithole" countries. We have become the laughingstock of the industrial world thanks to this abomination of an administration. We are pitied by sensible people who are not caught up in hatred. People in such desperate need deserve better. We have officially become uncivilized and it is due to the insidiously racist, xenophobic and belligerent behavior of these Fascist-like rulers. Employees in our government work for the people of this nation. Remember, it's "We the people" - not we the corporations. They must make the decision to exercise moral integrity and refuse to punish their fellow citizens the way these predatory corporate agents order them to. There comes a time when we all must be still and assess how we live our lives. What is more important - corporate profits and having the same skin tone or compassion and justice for all human beings? Thank you for allowing me to make this comment.

—R Sharkey, Kings Park, NY

My name is maria judith Colón . Maria has been a devastating experience for most Puertorricans . I live in the San Juan metropolitan area . My mother lives on the west side of the island . I was not able to communicate with her for 5 days . I couldn't access any reception and her land line was completely out of service . Due to lack of gas and road obstructions I couldn't get to her . I must say those were the most difficult days since she is elderly and depends on the phone to let her needs known . Finally I was able to go see her in person . When I go visit her, as of today , the communication are difficult and at times I need to go out of my community to get reception . It is extremely urgent and important that the FCC investigates and reassured the Puertorricans USA citizens that this will never happen again . Recently visited a relative in the center of the island no cell services available . We need help .

—Maria Judith Colon, San Juan, PR

Communication is essential. It's morally wrong to leave people like in Vieques helpless without communication. FCC fix the cell towers NOW!

—Doreen McCammon, Nevada City, CA

Por donde comenzar, were to start... that Wednesday, September 20 will be one we will never forget. I talk to my mom around 9am, they were as prepared as they could for a category 4 hurricane and decided to go stay at my neighbors house because it was safer. I am part of the diaspora, so I was not in PR for the hurricane but all friends and family are still in the island and some have move to the states after the hurricane. Every one of them have a story that move me to tears, but for the sake of this specific request I will limit them to two or three. My immediate family, my parents, my mom and sister had phone signal on and off during the whole ordeal they live in Bayamón, which is in the metropolitan area and I am more than thankful for that because I will have gone crazy if I wouldn't have listen from them for 14 or 20 days like it happened to so many of my friends here. Now for the rest of my family and friends in the island, it was another story. Power and water went off, the first strong winds came in and they were un-communicated. My friend decided to go stay with her parents in her hometown of Cidra - one of the towns where the eye of the hurricane when through - the day of the hurricane, the winds were extremely strong they could see debris flying around... then silence. They didn't had any radio or cellphone signal... they didn't know what was happening... it was clear for around 1 hour then the "viraron" came... some of them thought the hurricane was gone and were outside... the worst part of the hurricane just hit them right there... with no communications they couldn't know if the hurricane passed or if it was still there... after the hurricane passed it rain for the next two or three days so imagine the fear. Not knowing if the hurricane was still stationed on top of the island, not knowing where it was... and on top of that when the "viraron" came it was so strong that even thought they were on a cement house water started pouring out of the electric outlets like they were faucets! Now on to the third story, my aunt, my dear aunt, in the town of Orocovis... the day of the hurricane lost power and cellphone signal... she by mistake lock herself up in the house garage and if it was not because some neighbors came to her house and ask her to stay with her because their house was almost under water... without them who knows what would had happened to her if she has stay locked. Same aunt that we didn't hear from, for 5 days, 5 days that felt like a month. My big family, there and the family I have in Florida we were getting in touch how we could using Facebook messenger and my cousin in Florida and I will listen to Hurricane Maria Orocovis channel for hours and kept asking if someone knew about her. Silence... 5 days after the hurricane, groceries were scarce, people needed to stay overnight at gas stations to get gasoline for their cars... all the roads were block by dirt, trees, bridges on the floor... after trying around three times my godparents were able to get to her in Orocovis... see if she was fine, bring her some water and provisions... she ran out of drinking water like two days before (she drinks water from a spring that got damaged because of all the debris and winds) and was eating oranges to keep herself hydrated, she had clear all the tress from the roof of her house by herself and walk around 1 mile up the mountain through all the fallen trees to get the spring were she gets water from and see if she could clear it up.. but the trees were too big. I got to know the whole story like two weeks and half after it happened... that day when my godparents and cousin were driving back home got a speck of signal on one of their cellphones and call me... I didn't have my phone ringing so I didn't see the call coming in, they left me a 9 second voice message... Magdaliz, era para decirte que fuimos a Orocovis y titi Carmin esta bien para que se lo digas a los demás - Magdaliz, just wanted to tell you that we went to Orocovis and Titi Carmin is fine, please tell everybody. I can't imagine how other people that had family members that were sick, in oxygen or that needed dialysis and died who couldn't talk to them or know what happened for weeks... the death toll of the aftermath of the hurricane is more 1,000 people... the mayor of Orocovis walked for a day or more with a corpse just to be able to get signal on a cellphone and be pick up. There are thousands of stories like the ones I just wrote here. Still to this day there's people without power, water and phone signal... its been 5 months, and all I can think is that the 2018 hurricane season will start in a few months.

—Magdaliz Alvarez Figueroa, Silver Spring, MD

Incomunicado total

—Eduardo Amaro, Vega Alta, PR

Todavía tenemos áreas sin servicios de comunicación, no se tiene acceso al internet y al igual que hacer llamadas a familiares, los servicios telefónicos no funcionan, la electricidad todavía viene y va por la cual no tenemos acceso a la comunicación como internet. Al igual que hay personas sin hogar el cual le afecta significativamente en la comunicación. No funcionan las antenas en campos y pueblos del área metro para poder llamar y comunicarse. Ya vamos para 5 meses del suceso y todavía se necesita ayuda en muchas áreas.

—Anliz Alvarez Figueroa, Bayamon, PR

Estuve 5 días sin ningún tipo de señal en mi celular y sin poderme comunicar con mi familia. Luego estuve alrededor de un mes con muy poca señal y en poco momentos del día. Cuando lograba hacer una llamada muchas veces se cortaba a mitad. Durante ese mes no tuve Internet

—Abigail Medina, Cataño, PR

Durante el huracán Maria estuvimos incomunicados por 10 días sin señal de mi celular, tenía que ir en áreas altas para recibir señal, y contestar las llamadas de mis familiares de Estados Unidos, no podían comunicarme con mis familiares en PR, Mi proveedor de servicio celular TMobile dio muy buen servicio cuando regresó la señal, Debe darnos otra forma alterna a las compañías para no perder la señal de las comunicaciones.

—Ruth Morales, Bayamon, PR

Sumamente frustrante. Aún al paso del tiempo seguimos con los problemas tal vez no como al principio pero aún es intermitente la comunicación. En mi caso desde Irma perdí mi línea de teléfono e internet y al venir a verificar la esperanza es de que entre 2 o 3 meses si ponen postes tendré servicios. La tv perdimos casi todos los canales y el cable murió y esperando por servicio hace un mes. Celulares van y vienen.

—Denise, Cayey, PR

Lo peor después del huracán maria, fue cuando salimos a la calle y ver que todos los postes y alambrados cubrían las carreteras y no teníamos señal en los celulares ni en los hogares, no sabíamos si mis padres y hermanos estaban muertos o ahogados. Después de una semana fue que por mensajes de texto pudimos comunicarnos un poco y estar tranquilos.

—Ariel, Bayamon, PR

Most of my family lives in the the southeast of the Island, to be exact in the town next to where the hurricane Maria landfall. It wasn't until 12 days after Maria, that I was able to talk with my mom. She had to drive at least 30-40 min far from my town, park in the shoulder of a highway to be able to talk with me and my sister. The 10 min or so that last the call it was very difficult to understand what she was saying because the signal was bad. It wasn't until a week later that I was able to talk with her again. I went to the Island begging of November and I had to signal all the time. Almost 5 months after the hurricane communications still bad. I used to talk with my parents almost every day. Now if we are lucky, we talk twice a week. People in Puerto Rico pay a lot for cellphone and internet, they are US Citizens, they deserve to be treated the same way than the people that live in the US mainland.

—Sonia Gisselle Collazo Acevedo, Alexandria, VA

I have a prepaid account for AT&T. Since September 20, 2017, one of the towers that provided service for all AT&T customers in Adjuntas, PR (Zipcode 00601) collapsed, leaving us without service until November 27, 2017, when a cell-on-wheels truck was parked in my hometown. The thing is that I was forced to pay money to have my AT&T phone unlocked, so I could get a prepaid account for Claro. By the way, Claro restored its service (not 100%) in Adjuntas on October 10, 2017. I did get my three months of credit for the time I was without service. As of today, the AT&T tower has not been replaced or rebuilt, leaving us with a mediocre service. However, last weekend there was a service outage with one of Claro's fiber-optic cable, leaving all Claro customers in Adjuntas without phone or internet service until today. I feel that the telecommunication companies have left the people in the mountain area behind. My parents had AT&T postpaid accounts. One of the numbers was transferred to Claro and the other was not paid because of the lack of service from AT&T, who refused to give us a fourth month of credit.

—Luis Lugo, Adjuntas, PR

Its sad cuase some people still dont have lights or food or other things they need an they cant get in contact with their love ones they have no phones or they cant comunicate please help potorico get communications back an internet an more thanks

—Felisita Corral, Chicago, IL

Net Neutrality is good more, small businesses, education, charities, communications, knowledge, news, art, emergencies, foreign relations and so much more.

—cameron Iacono, North Attleboro, MA

right now, the government needs to work to decolonize the island - not make it worse.

—Priscilla Grim, Brooklyn, NY

I live on Vieques, Puerto Rico. We are a small island off of the Main Island of PR. We got a direct hit, CAT5 Hurricane Maria! Much of our island, and some of PR still don't have power 5 months after the storm. Vieques only has power through a generator, we can no longer receive power from the Main Island. We often still lose power to those who have it. It took me 10 days after Maria to find a satellite phone to call my family in the States. I was able to talk for 1 minute after waiting in line for about an hour. We had lines for the banks when they were open and limited withdrawals. We have been without water at times. I have AT&T service, I have been a good customer for years. After Maria we had no service for quite a while and it still drops calls, etc. I paid my bill just before Maria. My phone has been temporarily disconnected because AT&T sent me a bill for about \$1000! I barely had service...part of the time I had none. I offered to pay \$250 until we could reach an agreement, but they wanted over \$500 to turn service back on. I need my phone, but I think their charges are completely unfair considering we have had next to no service. I hope you can help me with this dilemma. Thank you!

—Elizabeth Zivic, Vieques, PR

My boyfriend & I have AT&T. We have had crap service since it was slightly reinstated on 10/28. Since that date there have been periods of little to no service. We would contact AT&T via WiFi (which even that was hard to find on Vieques, a separate island off of PR) and they'd say there were no issues and that no one else reported any problems (well duh, no one could report problems b/c we had no cell service). I tweet AT&T often who then send me a link to "diagnose my phone" to try and fix the problem (every single time I tweet them). My phone didn't go through the hurricane, AT&T's towers did! It's been very frustrating ESPECIALLY since we can't just drive down the road to another tower because we are an island off of an island. We were credited for Oct & Nov, but have been charged full price since then with exceptionally unreliable service. I did a speed test and here are our numbers on Vieques for AT&T: download is 0.60Mbps Upload is 0.74Mbps I get better throttled WiFi through HughesNet (b/c we exceed our data plan) than I do with AT&T and pay less than my cell phone bill. It's been tough because phone calls to family get dropped. My mom takes care of her sister who fell and broke her hip in December (my aunt has early on-set Alzheimer's) and my mom would try and call me about medical help (I use to be an LPN before I moved to PR). Our calls would keep getting dropped and our texts wouldn't send either. It was like a catch 22, which will work better? Calls or texts. Another huge thing was our island has a community page that we were using on Facebook to organize beach cleanups, tarp people's roofs, help clean up yards, helping our neighbors. With the cell service at the beginning being the worst it was extremely difficult to get the word out to the community and organize when the service was so spotty. Please if you can do anything to help the residents of Vieques PR our zip is 00765 and get AT&T to make good on charging us full prices despite poor service.

—Michelle Miller, Vieques, PR

Please let me know... Does Sinclair have any outlets in Arizona ?

—Mr. Donald Dotts, Tempe, AZ

The people of Puerto Rico were without power and home after the hurricane devastated the place. And our "president" didn't lift a finger to help the Puerto Ricans to get their home repair.

—Adelso Suarez, Tarrytown, NY

After learning of the continuing infrastructure problems so long after the hurricane, I thought of using GoFundMe to add funding for solar panels which could be distributed to those still without electricity, a relatively cheap and easy solution. However, GoFundMe is not available in Puerto Rico. No explanation was given. Puerto Rico is part of the USA, FEMA has greatly ignored its responsibility to the island, President Trump has mocked its population by tossing them paper towels, and yet even an American website created to extend help to needy Americans does not apply to Puerto Rico. This is a travesty.

—Joan Lobell, Baltimore, MD

I was not directly affected by Hurricane Maria, but I would still like to stand in solidarity with the people of Puerto Rico and demand access to communication services for this devastated community. My husband was in Mexico City during the strong earthquake last September (2017) and as soon as I found out I tried to communicate with him via cell phone and struggled for a while to connect with him. Luckily this only lasted a couple of hours and we were able to communicate and find out he was okay. I cannot even begin to imagine the hardship and anxiety the people of Puerto Rico went through when Hurricane Maria hit the island, and to know they continue to struggle due to the lack of communication services. This is unacceptable! If this would have happened in any other state in the U.S. communication services would have been restored right away. Puerto Ricans deserve to same access!

—Mrs. Olga Diaz, Watsonville, CA

Under Trump, children who are born to Puerto Rican parents will be denied American citizenship; and that's NOT acceptable. In countries like that, internet can be very slow...about as slow as 5kb/second...or your connection would be using standard dial-up (which would be around 56kb/second)

—Charles Wright, Ypsilanti, MI

A buddy of mine from the Capital San Juan reported that people were gathering on a hill in Bayamon in order to communicate with family both on the Island and here Stateside. The simple thought of being stuck with no way to communicate is a nightmare to the average American...but then average Americans did suffer this....and ARE still suffering this

—Daryl Lawrence Coleman, buffalo, NY

The right to information is a key part of civic participation and without the internet Puerto Rico is being harmed. This must be addressed by the FCC.

—Urvashi Nagrani, Foster City, CA

test

—Lucia A Martinez, Washington, DC

Media and the people are behind all of you.

—Alan Katzer, winston-salem, NC

I have friends in PR who went without electricity and water until about 2 weeks ago. My friends son had to drop by helicopter to reach her.

—Bob Segal, Tucson, AZ

I'll admit that I live in Tallahassee, not Puerto Rico. However, I stay updated through email, so I've heard about most people still don't have power. I believe that's sorely unacceptable for one of our territories.

—Lauren Tucker, Tallahassee, FL

As a US citizen, I am concerned by the effects of Hurricane Maria on the infrastructure of Puerto Rico. Regarding both electricity and internet service, our country has a longstanding legacy of employing cooperative enterprise for providing both these services. Given Puerto Rico's already strong cooperative insurance and credit union sectors, the island is well positioned to adopt cooperative models in other sectors as well. I hope the FCC and Congress will consider supporting organizations like the National Rural Electric Cooperative Association to help rebuild the island on a cooperative basis, owned and governed by residents themselves. Nathan Schneider Assistant Professor of Media Studies University of Colorado Boulder

—Nathan Schneider, Boulder, CO

This situation is ridiculous, the delays in repairing the infrastructure on Puerto Rico are inexcusable. As an American I am ashamed by this nations actions in this matter. Fix the power and phone system!

—Mark Butler, Moncks Corner, SC

Help our fellow Americans in Puerto Rico now.

—Jim Loveland, Gulfport, FL

Puerto Rico is a territory of the United States. This island is a subject of controversy in relation to the current administration. In September of 2017, Hurricane Maria destroyed much of the Puerto Rico's infrastructure thus rendered the island incapable of carrying out political, social and financial activities. Unfortunately, Puerto Rico remains crippled as Washington D.C. has yet to respond appropriately and adequately. Hurricane Maria has impacted Puerto Rico by damaging most of the island's cell towers which greatly limits communication while people remain living under darkness. The FCC is responsible for making sure that communications are stable during during and after disasters. Everyday, the president ignores the needs of his people and as a result the people in Puerto Rico continue to live without electricity.

—Marco, Omaha, NE

My company has both clients and employees in Puerto Rico who have been devastated and ignored by our government. Communications are one of the services we rely on to provide our clients' needs. It's obscene that this country can ignore its own responsibilities to take care of its own people. Act now.

—Ronald H Skees, Jeffersonville, KY

I don't live in Puerto Rico or know anyone personally there but will never be able to understand why America hasn't helped Puerto Rico more since they're AMERICANS! History will make you look bad but that doesn't help Puerto Rico NOW! Do the right thing!!

—Sue Whitlock, Somerset, KY

I think it's totally unacceptable the trump administration left Puerto Rico to rebuild on its own. Then he had the audacity to throw paper towels at the residents. He proved he is uncaring, shellfish and heartless. It breaks my heart to see people suffer, especially when their President goes there and mocks them. trump is incapable of compassion to people who are not trump's, billionaires or don't stoke his ego. I don't even know how many people died because mr heartless forced Puerto Rican's to rebuild on their own with his condescending comment: they need to get off their a\$\$ and get to work to rebuild their island instead of waiting for us to do it for them. I'm not from Puerto Rico, nor do know anyone who is. It does tick me off that the leader of our Country KNOWS Puerto Rico is part of America, (it took some convincing by many), but ignores his responsibility to support the efforts to help those dying and in need and to repair the electrical grid. Oh, he pays a ridiculous amount to a (1) single person to go fix it. Are you serious trump? He claims to be so smart, he's smart on manipulating, lying, cheating, stealing from the poor, forcing the poor to pay the rich, and spins lies like to his benefit. He is a moron, and I pray he's out of office soon, he is an embarrassment to millions.

—Nola Palmer, Sault Sainte Marie, MI

My mother's side of my family comes from Puerto Rico, and the majority of them lived there when Hurricane Maria hit. My mother tells me that her old friends from highschool can only use their phone and get access to internet when they are at work, as there is no power in their homes. My tio's mother died in the aftermath of the hurricane because she was crushed in her own apartment building. We couldn't even host a funeral because airport access was limited. My grandmother ships batteries and blankets to our family over there, and when they respond months later, they tell us their packages were opened and emptied. My grandpa told me about the rationing system they had and how there were limited supplies, and when their schools were opened, the lights flickered, and the kids were screaming out of happiness, and the lights turned off again. I don't think they've turned on again, but I don't know when their internet is strong enough to send another message. Please help us.

—Taina, philadelphia, PA

As someone of Puerto Rican descent, it is a shame though not surprising that this current administration shows its lack of compassion for the people of Puerto Rico and how they do not care about providing resources such as technology to help rebuild the island. One story that I can tell is that a close friend of my mother had her father living in Puerto Rico during Hurricane Maria. She mentioned that her friend was trying to communicate to her father through the phone, this was in the beginning of Maria. For several days, she tried reaching out to him, however with a lack of power, it was hard to go through. Eventually, she was able to communicate again with her father and he ended up doing okay. Unfortunately, there are other people in Puerto Rico who still face challenges with communication services on the island. The FCC along with the government needs to make it a priority to provide the people of Puerto Rico with communication services such as telephone and internet to communicate with their families and loved ones, as well as using those resources to rebuild the island.

—Briana Rosario, New York, NY

We need to hear what is needed in Puerto Rico.

—Andrea Billingsley, Trotwood, OH

Let Puerto Rico go and be their own country if we can't take care of them like one of our state's "United States" not so United for Puerto Rico!

—Bruce W Chapman, Bountiful, UT

If the US gives enough money to Puerto Rico the residents will stop adding to the US OVERPOPULATION; along with fixing the Middle East and Africa, so those residents will stop adding to the already OVERPOPULATED US; the States MUST APPROVE ABORTION, ENTIRE WORLD MUST APPROVE ABORTION BECAUSE THERE ARE TOO TOO MANY PEOPLE ON THIS TINY PLANET. THERE IS NO SUCH THING AS A SUPREME BEING: STUDY SCIENCE YOU RETARDS!

—A W, seattle, WA

I live on the Island of Vieques, Puerto Rico. After Hurricane Maria there was no land line, or cellular telephone service for months. Fortunately, some Vieques residents who had been on the USA mainland, came back to Vieques with a few Satellite Phones, so residents could contact family and let them know that they were safe. It took 2 weeks for me to be able to call family and assure them that I was okay. Around 3 weeks after the storm, the US Military came to Vieques, took over the Mayors office and implemented a curfew and Marshall Law. What I found most disturbing is that while Sprint and T-Mobile gave the Military 'the codes' to their cell communications systems... so that T-Mobile & Sprint customers could route & receive calls through the Military's cell communications set-up... AT&T REFUSED to do so ! Their reason ? They claimed that their personal were on their way to the Island to 'Fix' their damaged cell towers. It is now past 6 MONTHS since that claim. Their service has only been partially restored, so it is unreliable at best. I've been told that AT&T claims that there are 3 cell towers on Vieques and that they plan to have the 3rd one 'fixed' by April 16th, 2018. Lets HOPE that they fix it by then. I feel that AT&T should be fined for not providing their access codes to the Military, in the early days after Hurricane 'Maria'. Especially so because other cellular providers did so ! I'm an AT&T customer.

—Mr. Richie Kessler, Vieques, PR

ATT cell service was disrupted by hurricane maria ATT has been completely unresponsive. They have repeatedly told us that they are working in the problem, and now, 7 MONTHS after the event it's still not restored. They have offered no compensation although they say they have.

—Alex Mazzocca, Vieques, PR

ATT Cellular in the last 7 months has not repaired the 3 towers on the the island of Vieques PR from damages after Hurricane Maria on September 20 2017. After being given several previous restoration dates I was just told that there is no firm restoration date for repairs and no credits will be issued. Bad job ATT, very disappointed.

—James Zanone, Vieques, PR

I live on the small island of Vieques. I speak for every ATT customer here. I have repeatedly call and text ATT only to get some call center halfway around the world apologizing several times that our service is so poor. Can't help our situation. Can't get give us truthful answers. Just gives us dates two to three weeks out and when that date passes with no repairs they give another date. This has been going on since December. Now we are 7+ months since the storm and still deplorable service. Our small island relies on internet and communication service for our livelihood and ATT is not providing. However they don't hesitate to pull payment from mine and everyone else's accounts promptly. I'm sure if this was Austin Texas and the CEO's home area it would have been fixed in the first week. We the people of Vieques Puerto Rico don't no where to turn. Please help.

—Jeff Alles, Vieques, PR

Lack of cell coverage is impacting tourism and security. How can we communicate with potential visitors? How can we call the police? Dont say use land lines as there are none after the Hurricane. It's almost 7 months and the next SEASON is fast approach. PLEASE HELP #Vieques #ATT

—Murray Skinner, Vieques, PR

I have been to Vieques Puerto Rico 6 times since Maria hit. While there, the cell phone service was spotty at best. There would be literally days with no service. Then when there was "service", one could only text, not make a proper phone call or email. My provider is Verizon I do not understand the lack of performance and cooperation with cell phone providers plus the FCC's lack of help in this critical situation. Shame on you!!! Please step up to the plate here and do your job! Thank you

—Paula Chandler, Woodstock, NY

I have been with AT&T cell phone service for less than a year and I am very troubled with the lack of cell phone service on Vieques, PR. There has been very spotty reception at best since the hurricane Maris last fall. I own rental property in Vermont, USA and I rely on my cell phone to communicate with my tenants and my service contractors. This lack of reliable service from AT&T has made my life difficult and is causing me to lose money.

—Tom Scala, Vieques, PR

I have not had phone or INTERNET svc from either T-Mobile or Att for 7 months and 7 days After hurricane Maria.I changed from T-mobile to AT&T had svc. for a bit the the svc became sporadic and sometimes non-existent at best.Please help us on the Island of Vieques of Puerto Rico 00765

—Mark Semenuk, Vieques, PR

We were hit by hurricanes Irma and Maria in Vieques, PR 00765. After we were hit by hurricane Maria we had no cell phone service. Months later we had extremely limited cell phone service. Christmas week we had such limited service we were unable to reach out to our families except in brief conversations that dropped. Even now we have reduced download speeds and dropped calls. Text messages with attachments take long periods of time to be delivered. We need our phones and internet to work with insurance companies, FEMA and the SBA. Today, Monday, April 16, 2018 per AT&T technical service we have two of the three pre-maria towers operational. Both are operating at slightly degraded service. They do not have a date for complete service to be restored on these two towers. The third tower is scheduled to be returned to service on May 13, 2018. The technicians here in Vieques are waiting on a radio. AT&T is currently purchasing data from Aeronet. They are unable to purchase any more bandwidth. We do not have pre-Maria bandwidth or download speeds. These are the updated dates and change daily. Sometimes from phone call to phone call. AT&T initially issued credits for the customers affected by the storm. We were grateful for those credits but they were not automatically applied and each credit required countless hours on the phone with multiple agents and lots of dropped calls. I have logged an estimated 26 hours of phone calls with multiple agents in the Customer Service, Loyalty and Tech Service departments. AT&T is also trying to charge me for data that I have not used. They keep claiming that I have gone over or near my limit on my devices. One of these devices is unplugged and turned off most of the time yet they say it is still using data. AT&T is currently not issuing any additional credits for degraded service. We are being charged the same amount for our monthly bills that we paid before Hurricanes Irma and Maria. AT&T Customer Service told me that we have to pay the full bill and AT&T will issue a credit in the future after service is completely restored. This makes absolutely no sense to pay full price for half the service. The Customer Service rep actually told me that AT&T was not prepared for Hurricane Maria as they did not know that the storm was coming! Technical Service admits that we do not have full coverage. The Loyalty Program representative told us that no credits will be made and to trust AT&T. We are being held hostage by AT&T. They are very aware that we have minimal carriers available to choose from. At my home in Vieques the only option is to use AT&T. We no longer have landlines as a back up option. Please help us in Vieques, PR. We are a remote island off the coast of Puerto Rico. Our physical isolation is only further enhanced by AT&T's lack of service. Credits need to be issued by upper management and be accessible to their sub-contracted customer service. These credits should be made available every month before the bill is due. The credits should not be verbal promise that could be available in the future. Your assistance is greatly appreciated.

—Katherine Cole, Vieques, PR

We live on Vieques a Puerto Rican island 8 miles off the southeast coast of Puerto Rico. After hurricane Maria on Sept. 20 we had no service from AT&T. A month later, we were able to pick up limited service to make a quick call, which usually dropped after one minute, only if we climbed a hill so we had sight of PR and picked up a signal from the main island. When I finally reached AT&T they said there was not a problem with service in our area and that it must be my device! Meanwhile, my husbands mother was dying in hospice in CA and he had no way to call her. My 100 year old mother in TX was worried since she hadn't heard from us. We had no way to contact insurance companies, FEMA, or any relief organizations. AT&T kept sending us bills for service not provided. 7 months later, normal service has STILL not been restored. NOT ACCEPTABLE!

—Barbara Berger, Vieques, PR

Amy Kroin, Hadley, MA

Mekala Ravishankar, Edison, NJ

Yma Corrales, Miami, FL

J Michael, New York, NY

Lisa Bergerud, Minneapolis, MN

Jason Husby, Minneapolis, MN

Eusebio Manuel Vestias Pecurto Vestias,  
Washington, DC

Samia Zaman, New York, NY

Raymond Simon jr, Hartford, CT

Greg S, South Holland, IL

Anna Torres, Cayey, PR

Roger Demeny, HOUSTON, TX

JT Smith, Sellersville, PA

Dutch Cosmian, Florence, MA

John Rybicki, Staten Island, NY

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## Appendix B: Broadband Deployment in Puerto Rico (prepared by Free Press)

Free Press analyzed FCC Form 477 deployment data to determine the state of fixed-terrestrial broadband deployment in Puerto Rico (i.e., we did not examine mobile wireless or satellite broadband deployment). This data is a rich source of information on broadband deployment. Every ISP submits to the FCC on a semi-annual basis information on the types of technology it offers and the transmission speeds for every Census block where it offers broadband. Free Press analyzed this data for deployment as of December 31, 2016, the most recent publicly-available data.

Our analysis of this FCC broadband deployment data shows that Puerto Rico's fixed broadband access market mirrors that seen at the national level: a cable-telco duopoly that covers most of the urban population and a large proportion of the rural population, with notable gaps. Puerto Rico's telephone company ISP (Claro, formerly called Puerto Rico Telephone Company) – like all other telephone company ISPs – continues to lag behind its cable company competitor (Liberty) in terms of transmission speeds, but is slowly narrowing the gap. This gap is due to the far higher costs of upgrading telephone company networks compared to cable networks. It will continue to narrow in urban areas, though at an uncertain pace. While the FCC does not collect pricing data, other research indicates that weak-duopoly competition results in artificially high prices and other suboptimal outcomes (in areas such as customer service and innovation).

Highlights of our analysis of FCC broadband deployment data for Puerto Rico as of December 31, 2016 include:

### **Five fixed terrestrial ISPs serve Puerto Rico.**

- Claro (the trade name of ISP services sold by Puerto Rico Telephone Company), is Puerto Rico's largest fixed broadband carrier, offering DSL and fiber-to-the-home (FTTH) internet access services to 90 percent of Puerto Ricans. Claro markets internet access service exceeding 10 Mbps across its entire Puerto Rico footprint, but its deployment of higher speeds is notably smaller.
  - Claro's primary technology is ADSL2, which it uses to offer 16 Mbps downstream service. Claro offers a faster DSL standard (VDSL) to 29 percent of the customers in its service footprint (delivering 50 Mbps downstream), and FTTH (delivering 75 Mbps downstream) to just 0.4 percent of the customers in its footprint. Overall, 30 percent of the population in Claro's service footprint can purchase services at downstream speeds exceeding 25Mbps. Claro's higher-speed coverage is actually greater in its rural footprint, with 49 percent of these persons able to purchase 25Mbps or higher-level services. In total, Claro offers internet access service to 92 percent of the island's urban population, and 62 percent of the rural population.
- Liberty, owned by cable mogul John Malone's Liberty Global, is Puerto Rico's second largest fixed broadband carrier, offering cable modem-based internet access services to 86 percent of Puerto Ricans. Liberty markets internet access service exceeding 300 Mbps

across its entire Puerto Rico footprint. Liberty offers internet access service to 89 percent of the island's urban population, and 40 percent of the rural population.

- Caribe.Net (the trade name for ISP services sold by Critical Hub Networks) is Puerto Rico's third largest fixed broadband carrier, offering primarily fixed wireless internet access services to 37 percent of Puerto Ricans. The company was Puerto Rico's first ISP, and also operates as a "wireline over-builder" where it markets FTTH. Caribe.Net markets internet access service exceeding 10 Mbps across its entire Puerto Rico footprint, but its deployment of higher speeds is notably smaller.
  - Caribe.Net's primary technology is fixed wireless, which can reach very high speeds, but the company's offering is 10Mbps. Caribe.Net offers a this service to all of the customers in its service footprint, and FTTH to 8 percent of the customers in its footprint (the latter equating to 3 percent of Puerto Rico's total population). In total, Caribe.Net offers internet access service to 40 percent of the island's urban population, but only 3 percent of the rural population.
- The remaining two providers cover a much smaller portion of the island's population.
  - Worldnet (a Competitive Local Exchange Carrier, or CLEC) primarily relies upon wholesale access to Claro's network and its own facilities to serve businesses. Its residential offerings are available to 10 percent of Puerto Ricans, and are based upon an older cable modem standard. This service offers speeds between 15 and 20 Mbps.
  - CoquiTel markets a 10Mbps fixed wireless service to less than one-tenth of one percent of the island's population.

**Basic broadband availability** (i.e. access to service at certain speeds, without regard to the number of providers) **in Puerto Rico is similar to that seen in the overall U.S.**

- Nearly 9 out of every 10 persons in Puerto Rico are served by at least one fixed terrestrial ISP.
  - 91 percent of the Puerto Rican population is served at any speed. This is slightly below the value for the entire U.S. (97 percent of the population).
  - 91 percent of the Puerto Rican population is served by a wired ISP offering downstream speeds of 10 megabits per second (Mbps) or higher. This is slightly below the value for the entire U.S. (94 percent of the population).
  - 91 percent of the Puerto Rican population is served by a wired ISP offering downstream speeds of 25 Mbps or higher. This is almost identical to the value for the entire U.S. (92 percent of the population).
- The availability of higher transmission speeds in Puerto Rico exceeds the national value, primarily due to the fact that Puerto Rico has a very high urban population (94 percent) compared to the overall U.S. (81 percent).
  - 90 percent of Puerto Ricans reside in a location with at least one wired ISP offering services exceeding 50Mbps downstream, with 86 percent able to purchase services exceeding 300Mbps.

**Puerto Ricans have less ISP choice at higher speeds than the average person residing in the U.S.**

- The average person in Puerto Rico has 2 choices of wired ISP offering speeds at 10Mbps, slightly higher than the national average (1.7 such ISPs). At higher speeds, the market quickly turns into a Liberty monopoly.
  - Only 24 percent of persons in Puerto Rico are served by two or more fixed terrestrial ISPs offering 25Mbps or higher level services. By comparison, 54 percent of all persons in the U.S. have ISP choice at this speed threshold.
  - Only 24 percent of persons in Puerto Rico are served by two or more fixed terrestrial ISPs offering 50Mbps or higher level services. By comparison, 43 percent of all persons in the U.S. have ISP choice at this speed threshold.
  - Only 3 percent of persons in Puerto Rico are served by two or more fixed terrestrial ISPs offering 100Mbps or higher level services. By comparison, 24 percent of all persons in the U.S. have ISP choice at this speed threshold.

**Rural Deployment is lower overall in Puerto Rico compared to the entire U.S., but exceeds the national level at the very highest speeds.**

- Approximately 65 percent of Puerto Ricans residing in rural areas are served by one or more terrestrial fixed ISP, with deployment to all of these persons of 10Mbps-level service. By comparison, 87 percent of the total U.S. rural population are served by one or more terrestrial fixed ISPs, with deployment to 77 percent of rural U.S. inhabitants of 10Mbps-level service.
  - Approximately 64 percent of Puerto Ricans residing in rural areas have access to 50Mbps-level service. By comparison, 62 percent of rural U.S. inhabitants have access to 50Mbps-level service.
  - Approximately 40 percent of Puerto Ricans residing in rural areas have access to 300Mbps-level service. By comparison, 21 percent of rural U.S. inhabitants have access to 300Mbps-level service.

**Rural ISP choice is lower overall in Puerto Rico compared to the entire U.S.**

- Approximately 38 percent of Puerto Ricans residing in rural areas are served by two or more terrestrial fixed ISPs, with all of these rural persons having access to 10Mbps-level service. By comparison, 50 percent of the total U.S. rural population are served by two or more terrestrial fixed ISPs, with 34 percent of rural U.S. inhabitants having access to 10Mbps-level service from two or more providers.
- Puerto Rico's maximum available internet access speeds are high (due to improvements in cable modem technology), but are slightly behind the U.S. average.
  - The average maximum available downstream speed available in Puerto Rico is 308Mbps, compared to 396Mbps for the entire U.S.

In sum, broadband deployment in Puerto Rico – like the rest of the nation – is progressing, with cable leading the way. Puerto Rico's incumbent telephone company ISP has plenty of work to do

to catch up to its cable competitor. Until it does (and even if it does), Puerto Ricans will continue to face a market that increasingly functions as a weak-monopoly.

**Figure 1:**  
**Percent of Puerto Rico’s Population with Access to Wired Broadband by Downstream Speed**  
**(Year-End 2016)**

Downstream Speed	Percent of Puerto Rico's 2010 Census Block Population with Access to Wired Broadband by Downstream Speed December 31, 2016
Any	91.2%
≥3 Mbps	91.2%
≥10 Mbps	91.2%
≥25 Mbps	89.8%
≥50 Mbps	89.8%
≥100 Mbps	86.3%
≥300 Mbps	86.3%

Source: Free Press analysis of FCC Form 477 deployment data, as of December 31, 2016 (version 1). Values are based on U.S. Census Bureau's Block-level population counts as reported for the 2010 Census.

**Figure 2a:  
Percent of Puerto Rico’s Population by Number of Available Wired ISPs and Downstream Speed  
(Year-End 2016)**

Number of Wired ISPs	Percent of 2010 Census Population by Number of Available Wired ISPs and Downstream Speed Year-End 2016						
	Any Speed	≥3 Mbps	≥10 Mbps	≥25 Mbps	≥50 Mbps	≥100 Mbps	≥300 Mbps
0	8.8%	8.8%	8.8%	10.2%	10.2%	13.7%	13.7%
1	5.5%	5.5%	5.5%	65.4%	65.4%	83.5%	83.5%
2	74.8%	74.8%	74.8%	22.7%	22.7%	2.8%	2.8%
3	10.1%	10.1%	10.1%	1.6%	1.6%	0.0%	0.0%
4 or More	0.8%	0.8%	0.8%	0.0%	0.0%	0.0%	0.0%
One or More	91.2%	91.2%	91.2%	89.8%	89.8%	86.3%	86.3%
Two or More	85.7%	85.7%	85.7%	24.3%	24.3%	2.8%	2.8%

Source: Free Press analysis of FCC Form 477 deployment data, as of December 31, 2016 (version 1). Universe is populated 2010 Census blocks in Puerto Rico (50,920 blocks containing 3725789 persons). Values do not capture population growth, population movement between blocks, or deployment in blocks with zero residents as of the 2010 Census.

**Figure 3:  
Average Maximum Available Wired Downstream Speed (Mbps) by Area Type  
(Year-End 2016)**

Puerto Rico Census Block Type	Average Maximum Available Wired Downstream Speed (Mbps)
	Dec. 31, 2016
2010 Rural Blocks	177.7
2010 Urban Blocks	308.5
All Puerto Ricans (population-weighted)	307.8

Source: Free Press analysis of FCC Form 477 deployment data, as of December 31, 2016 (version 1). Values reflect all 2010 populated Puerto Rico Census blocks.

**Figure 4:  
Percent of Puerto Rico Population Served by Downstream Speed and Area Type  
(Year-End 2016)**

Wired ISP Downstream Speed	Percent of 2010 Census Rural Population Served	Percent of 2010 Census Urban Population Served
	Dec. 31, 2016	Dec. 31, 2016
Any	65.0%	92.9%
≥3 Mbps	65.0%	92.9%
≥10 Mbps	65.0%	92.9%
≥25 Mbps	63.8%	91.5%
≥50 Mbps	63.8%	91.5%
≥100 Mbps	40.3%	89.4%
≥300 Mbps	40.3%	89.4%

Source: Free Press analysis of FCC Form 477 deployment data, as of December 31, 2016 (version 1). Values reflect all 2010 populated Puerto Rico Census blocks.

**Figure 5:  
Percent of Puerto Rico Population Served by Two or More Wired ISPs,  
by Downstream Speed and Area Type  
(Year-End 2016)**

Wired ISP Downstream Speed	Percent of 2010 Census Rural Population Served by Two or More ISPs	Percent of 2010 Census Urban Population Served by Two or More ISPs
	Dec. 31, 2016	Dec. 31, 2016
Any	38.2%	88.9%
≥3 Mbps	38.2%	88.9%
≥10 Mbps	38.2%	88.9%
≥25 Mbps	6.8%	25.5%
≥50 Mbps	6.8%	25.5%
≥100 Mbps	0.0%	3.0%
≥300 Mbps	0.0%	3.0%

Source: Free Press analysis of FCC Form 477 deployment data, as of December 31, 2016 (version 1). Values reflect all 2010 populated Puerto Rico Census blocks.

## Appendix C: Wireless Lifeline In Puerto Rico (prepared by Free Press)

Free Press examined the USAC ZIP code database to determine which carriers offer Lifeline in Puerto Rico. There are 175 ZIP codes in Puerto Rico, and Lifeline is available from one or more carriers in all ZIP codes. Wireless Lifeline is available in all 175 ZIP codes with an average of nine wireless Lifeline carriers in each ZIP code. Wireline Lifeline is available in 167 of the 175 ZIP codes with an average of one wireline Lifeline carrier in each ZIP code. The 11 wireless carriers that offer Lifeline in Puerto Rico (including the number of ZIP codes in which they offer this service benefit) are:

- AT&T Mobility (140)
- Absolute Mobile (4)
- American Assistance (128)
- Blue Jay Wireless (169; Blue Jay appears to have ceased operations)
- Boomerang Wireless (131)
- Claro (173)
- Open Mobile (168)
- Q Link Wireless (149)
- Safelink Wireless (166)
- Stand Up Wireless (161)
- T-Mobile (145)

Two wireline carriers offer Lifeline in Puerto Rico:

- Claro (167)
- Worldnet (33)

The wireless carriers offering Lifeline are a mix of facilities-based (AT&T; Claro, owner of Safelink Wireless; Open Mobile, joint venture with Sprint; and T-Mobile) and resellers (Absolute Mobile; American Assistance; Blue Jay Wireless, which appears to have ceased operations after FCC fines; Q Link Wireless; Stand Up Wireless). The facilities-based carriers' Lifeline plans in Puerto Rico are as follows:

- AT&T: AT&T Mobility's service in Puerto Rico is a \$24.99 monthly package (\$15.74 after discount) for 1,000 Anytime minutes and 1,000 night and weekend minutes. This plan does not include SMS, and most importantly, does not include internet access.<sup>75</sup>
- Claro: Claro only offers a \$12.75 discount on its services in Puerto Rico (\$9.25 FUSF, \$3.50 Commonwealth of Puerto Rico discount). Claro's Lifeline brand, Safelink (which is one of the largest Lifeline companies in the U.S., operating as a reseller on the mainland) offers a free plan that includes 350 voice minutes, unlimited SMS and 1GB data.<sup>76</sup>

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<sup>75</sup> AT&T, "Application for Lifeline Subsidies for Puerto Rico" (last visited Mar. 14, 2018), <https://www.att.com/ecms/dam/att/consumer/help/lifeline/pdf/PuertoRico-Application-EN.pdf>.

<sup>76</sup> Claro, "Programa Lifeline De Claro" (last visited Mar. 14, 2018), [http://files.claropr.com/Legal/SU\\_SOL\\_REV\\_%202016\\_Dic\\_CDR2yCom.pdf](http://files.claropr.com/Legal/SU_SOL_REV_%202016_Dic_CDR2yCom.pdf).

- Open Mobile: \$17.25 base plan (after discount) includes unlimited voice in Puerto Rico and unlimited SMS. For \$27.25 (after discount) users can also get 500MB of data, with “unlimited internet” (which sounds like Sprint’s 2G-speed throttled access). For \$37.25, users get 2.5GB of data and the same throttled “unlimited internet.”<sup>77</sup>
- T-Mobile: In Puerto Rico, T-Mobile’s Lifeline plans include unlimited voice for \$7.74 after discount. Puerto Rico Lifeline users that want mobile data can opt for a plan of unlimited voice and SMS plus 1GB LTE data for \$17.49 after discount, or choose a plan that offers unlimited voice, SMS and 6GB LTE data for \$29.75 after discount. All of these Puerto Rico plans (like T-Mobile’s mainland Lifeline plans) require the purchase of a \$25 SIM starter kit. However, T-Mobile’s fine print indicates that applicants will also face a credit check, severely reducing the utility of the program.<sup>78</sup>

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<sup>77</sup> Open Mobile, “ Ofertas Programa Lifeline” (last visited Mar. 14, 2018), <http://openmobilepr.com/promocion/detalle/ofertas-programa-lifeline>.

<sup>78</sup> T-Mobile, “Lifeline” (last visited Mar. 14, 2018), <https://t-mobilepr.com/lifeline>.