



February 20, 2018

Senador Miguel A. Laureano Correa
Comisión Innovación, Telecomunicaciones,
Urbanismo e Infraestructura
Senado de Puerto Rico

Via email: zvila@senado.pr.gov

Re: Opposition to Senate Bill 739

Dear Presidente Laureano Correa:

On behalf of CTIA®, the trade association for the wireless communications industry, I write to oppose Senate Bill 739, which seeks to grant exclusive primary jurisdiction to the Department of Consumer Affairs of Puerto Rico (DACO) to address and resolve complaints filed by consumers of telecommunications goods and services. We believe this legislation is not necessary as the Telecommunications Regulatory Board (TRB) already has the jurisdiction and expertise to adjudicate consumer complaints regarding telecommunications issues.

Currently, the TRB has primary and exclusive jurisdiction to determine the existence of a violation of Law 213 (Law 213-1996) its rules and regulations and any service contract. The TRB is the appropriate agency for these matters because of its expertise in telecommunications and its history of working with the telecommunications industry to effectively and efficiently resolve consumer complaints.

Additionally, the legislature has already definitively granted the TRB jurisdiction over complaints of telecommunications customers and granting new and additional jurisdiction to DACO in an area not under its current expertise would add an additional layer of unnecessary regulation on an extremely competitive industry and could result in customer confusion.

The TRB is the specialized forum with the technical knowledge necessary to address any claim related to telecommunication services, service contracts and its rules and regulations. This was the reason for which the Telecommunications Regulatory Board of Puerto Rico was created in 1996 and the jurisdiction was removed from the Public Service Commission. Therefore, we oppose SB 739 as



we believe consumers are best served by having the Telecommunications Regulatory Board continue to adjudicate customer complaints related to telecommunications.

Sincerely,

Director, State Legislative Affairs