



May 19, 2020

The Honorable Antonio Pabón
Chief of Staff
La Fortaleza
P.O. Box 9020082
San Juan, PR 00902-0082

Dear Mr. Pabón:

Thank you for taking the time to discuss wireless retail re-openings as the Government of Puerto Rico prepares to re-open the economy. Please know the wireless industry understands the challenges that government officials face when making important decisions on re-opening.

As telecommunications services are an essential service under federal guidance and as acknowledged by the Government of Puerto Rico, we are asking that Puerto Rico allow wireless carriers to open retail locations that are stand alone, located at strip malls, or have the ability to provide services curbside. With the policies that wireless carriers currently have in place, carriers can comply with the social distancing guidance and the appropriate protocols at these retail locations. We are also asking that restrictions on weekend openings be lifted. As citizens, including government employees, are working from home (mostly Monday to Friday) it is crucial to open on weekends to cater to that sector's telecom related needs.

Allowing Puerto Rico citizens to be equipped with wireless services will make it possible for them to better conduct the professional, educational, and social aspects of their lives from the safety of their homes. It will also help ensure further digital inclusion. In addition, small businesses play a vitally important role in Puerto Rico's economy. It is critical that small businesses be allowed access to wireless services so that they can successfully adapt to the post-COVID-19 world.

On May 1, 2020, Executive Order OE-2020-038 was approved, lifting some of the restrictions previously imposed on telecommunications providers. Employers from all exempted sectors were required under this Order to complete a self-certification document and prepare an infection control risk management plan, based on OSHA 3990 Occupational Health and Safety Guidance, both of which carriers shall submit to the Puerto Rico Department of Labor and Human Resources.

CTIA members operating in Puerto Rico currently provide services by appointment only, require customers and retail associates to wear facial coverings at all times, and practice social distancing. Furthermore, contractors clean stores daily, surfaces are disinfected every two hours, and equipment is disinfected after every transaction. AT&T has adopted curbside only service, while the new T-Mobile, including Sprint and Puerto Rico Wireless, limits hours of operation on Monday to Friday from 9:00 am to 5:00 pm, limits store



capacity to no more than 10 people at the same time, including employees. In addition, T-Mobile only serves customers on a 1:1 ratio (Account Owner or Authorized person only, unless customer has special need for assistance).

As you know, telecommunications services are being used more than ever by the consumer public. We have seen a dramatic increase in voice data across our networks and a significant increase in data traffic. As such, we need the ability to address customer service and other issues to keep the public connected. It is imperative that wireless carriers be allowed to operate without limitations on days of the week and number of locations so that we can provide essential services in our stores throughout the island. The industry operates in compliance with the Governor's Executive Orders and the provisions of the Telecommunications Bureau's Administrative Orders and DECC's guidance. Consequently, we urge the Government to allow wireless carriers to resume operations at our retail locations as necessary and on weekdays and weekends.

We look forward to working jointly with you to ensure Puerto Rico maximizes its telecommunications infrastructure in the post COVID-19 environment to remain competitive in the global economy while continuously looking out for the health safety of all.

Thank you again for your consideration, and please let me know if you have questions.

Sincerely,

Gerard Keegan
Vice President
State Legislative Affairs

cc: The Honorable Manuel Laboy, Secretary of Economic Development