



U.S. Department of Justice

National Security Division

Assistant Attorney General

Washington, D.C. 20530

February 4, 2011

By E-File

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th St. SW, Room TW-B204
Washington, DC 20554

**Re: América Móvil S.A. de C.V.
Puerto Rico Telephone Company, Inc.
ISP-PDR-20100623-00012
ISP-AMD-20100722-00016
ISP-AMD-20100722-00017**

Dear Ms. Dortch:

The Department of Justice (“DOJ”), including the Federal Bureau of Investigation (“FBI”), with the concurrence of the Department of Homeland Security (“DHS”) (collectively, the “Agencies”), does not object to the FCC’s grant of América Móvil, S.A. de C.V.’s (América Móvil) request that the FCC revise its existing declaratory ruling under section 310(b)(4) of the Communications Act of 1934, as amended, 47 U.S.C. § 310(b)(4), to permit 40.18% indirect equity ownership of Puerto Rico Telephone Company, Inc.’s (PRTC) by Carlos Slim Helu and members of his immediate family, provided that the FCC conditions its consent on compliance by the companies with the commitments set forth in the December 15, 2006 Security Agreement between América Móvil, S.A. de C.V. (América Móvil), on behalf of itself and the subsidiaries through which it will hold its interest in Telecomunicaciones de Puerto Rico, Inc. (TELPRI), TELPRI, DOJ, and DHS (“the Security Agreement”). Further, the Agencies do not object to PRTC’s amendments to the petitions for declaratory ruling to permit this foreign ownership structure in the 700 MHz Band licenses PRTC won in Auction No. 73 and the Advanced Wireless Services licenses PRTC won in Auction No. 78, again provided that the FCC conditions its consent on company compliance with the Security Agreement. Accordingly, based on the information provided to the Agencies by the companies and analysis by the Agencies of potential national security, law enforcement and public safety issues, the Agencies hereby notify the Commission that they have no objection to the petition and the amendments.

Thank you for your consideration.

Sincerely,

/s/ Siobhan E. Dupuy
Attorney Advisor
Foreign Investment Review Staff
National Security Division
U.S. Department of Justice

cc:

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