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May 4, 2015

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VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Puerto Rico Telephone Company, Inc., Petition for Declaratory Ruling
under Section 310(b)(4) of the Communications Act of 1934, as Amended;
File No. ISP-PDR-20140707-00004

Dear Ms. Dortch:

At the request of the staff of the International Bureau, América Móvil, S.A.B. de C.V. (“América Móvil”), the parent company of Puerto Rico Telephone Company, Inc., by its counsel, hereby submits additional information regarding its above-captioned Petition for Declaratory Ruling.

In its June 23, 2010 Petition for Declaratory Ruling, América Móvil referenced that it had “put in place internal measures” to prevent future violations of Section 310(b) stemming from circumstances similar to what had led to an increase in the Slim Family ownership in América Móvil in excess of levels requiring prior FCC approval.¹ Those measures, which were focused on the effect of the company’s issuances and repurchases of its shares on the Slim Family ownership, were as follows:

- América Móvil implemented a regular review of reports (Schedule 13D and amendments) filed by the Slim Family with the U.S. Securities and Exchange Commission (“SEC”), through which the family’s reported level of beneficial ownership is monitored and compared to FCC-imposed limits on such ownership.²

¹ Petition for Declaratory Ruling Pursuant to Section 310(b)(4) of América Móvil, S.A.B. de C.V., File No. EB-11-IH-0216 (June 23, 2010). The referenced increase in Slim Family ownership had been triggered by América Móvil’s issuance of additional shares as part of a two tender offers.

² Under Rule 13d-2(a) of the Exchange Act, 17 C.F.R. § 240.13d-2(a), filers of Schedule 13D must promptly file amendments to such schedule if any material changes occur to the facts submitted in the previous filed schedule. For purposes of this rule, any acquisition or disposition of beneficial




Ms. Marlene H. Dortch, Esq.
May 4, 2015
Page 2

- América Móvil conducted an analysis of how proposed issuances of its shares could impact the Slim Family's ownership and of how it would compare to FCC-imposed limits on such ownership.
- The Mexican Stock Exchange requires América Móvil to monitor its share repurchases on a daily basis and to notify the exchange of any changes in the amount of shares outstanding, series of shares and share price. América Móvil implemented an additional step to this daily review to analyze the impact of the day's share repurchases on the level of ownership reported by the Slim Family and how any resulting change in such ownership compares to FCC-imposed limits.

Please do not hesitate to contact the undersigned counsel for América Móvil should you have any questions or require additional information.

Respectfully submitted,



Nancy J. Victory
Counsel for América Móvil, S.A.B. de C.V.

(Continued . . .)

ownership of an amount equal to 1% or more of any class of securities are deemed to be material changes.