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June 24, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: WT Docket No. 10-90
WT Docket No. 10-208

Dear Ms. Dortch:

On June 21, 2019, undersigned counsel and Kevin Frawley, the chairman of the board of Smith Bagley, Inc. ("SBI"), met with Nathan Eagan, Garnet Hanley, Erin Boone, Valerie Barrish, Margaret Wiener, Susan Mort, and Jonathan McCormack to discuss the upcoming Tribal Mobility Fund Phase II auction.

SBI discussed its recent investments in its network that have improved coverage and mobile broadband speeds in substantial portions of its service area. SBI noted that there remain substantial Tribal areas where existing cell sites are located far from fiber connectivity, preventing deployment of fast 4G LTE broadband, as well as 5G networks of the future.

SBI also discussed the need to weight the Tribal Mobility Fund auction to minimize the possibility that the most remote and difficult-to-serve Tribal lands (and, by extension, the highest cost areas) could be foreclosed from receiving support at the auction. SBI provided the attached exhibit, containing examples of how an auction could be weighted for this purpose.

In addition, SBI suggested the addition of a universal service grant program for remote Tribal lands where special circumstances, such as low telephone or broadband penetration, warrant targeted action by the Commission. The FCC could base the program on the U.S. Department of Agriculture's Substantially Underserved Tribal Areas program, which allows USDA to allocate funds to areas most in need in response to requests from eligible applicants. The Commission could adopt rules similar to those set forth at 7 C.F.R. §§ 1700.100-1700.150.

Hon. Marlene H. Dortch
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Should you have any questions, please contact undersigned counsel directly.

Sincerely,

A handwritten signature in black ink, appearing to read "D. LaFuria".

David A. LaFuria
Counsel for Smith Bagley, Inc.

Enclosure

cc: Nathan Eagan
Garnet Hanley
Erin Boone
Valerie Barrish
Margaret Wiener
Susan Mort
Jonathan McCormack
Kevin Frawley

Examples of How to Weight an Auction

Tribal Mobility Fund Phase II Weights Based on Telephone Penetration Rates	
Lacking Telephone Service	Weight
Below 6%	40
6.1-10%	10
Above 10%	0

Tribal Mobility Fund Phase II Weights Based on Mobile Broadband Penetration at 10/1	
Lacking Mobile Broadband at 10/1	Weight
Below 20%	40
21-40%	10
Above 40%	0

Tribal Mobility Fund Phase II Weights Based on Population Density	
Eligible Area Pop. per Sq. Mile	Weight
Above 80	40
40-79	30
20-39	20
Below 20	0