

Via Electronic Comment Filing System

November 1, 2017

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

Re: *Notice of ex parte meeting of Gila River Telecommunications, Inc.
Bridging the Digital Divide for Low-Income Consumers, WC Docket No.
17-287; Lifeline and Link-Up Reform and Modernization, WC Docket No.
11-42; Telecommunications Carriers Eligible for Universal Service
Support, WC Docket No. 09-197*

Dear Ms. Dortch:

By this letter, and pursuant to Sections 1.1206 of the Commission's rules,¹ Gila River Telecommunications, Inc. (GRTI) provides notice of an October 30, 2017 meeting with Associate Chief of the Wireline Competition Bureau (WCB) Trent Harkrader and Telecommunications Access Policy Division (TAPD) Chief Ryan Palmer and of meetings on October 31, 2017, with Lyle Ishida and Sayuri Rajapakse of the Office of Native Affairs and Policy and separately with Jay Schwarz, Wireline Adviser, Chairman Ajit Pai with the undersigned to discuss the Lifeline and Link-Up Reform and Modernization draft item on circulation in the above proceedings.

At each meeting GRTI discussed the ongoing need for enhanced Lifeline given the economic challenges faced by residents living on tribal lands. As noted in GRTI's 2015 comments, tribal communities have substantially lower household incomes and substantially higher poverty and unemployment rates than the national average, a key reason for the initial adoption of the enhanced Lifeline program.²

GRTI also discussed the proposal to define "rural Tribal lands" using the definition for rural that is utilized for the Schools and Libraries program. GRTI noted that it had looked at information contained in the Schools and Libraries database and that while the Community is considered rural, there are classification errors in the Schools and Libraries database that the Commission should provide carriers an opportunity to correct if the Commission moves forward with the proposed definition.

¹ 47 C.F.R. § 1.1206.

² Comments of Gila River Telecommunications, Inc., WC Docket No. 11-42, available at <http://apps.fcc.gov/ecfs/document/view?id=60001223334> at 5-6 (*GRTI Lifeline comments*).

In response to the Notice of Inquiry portion of the draft, GRTI reiterated that the Commission should consider increasing the support amount for broadband services.³ GRTI referenced its previously filed comments that noted that the A-CAM model uses a \$52.50 benchmark rate for broadband end user revenue and the Commission's rate survey shows a "reasonably affordable" rate for 10 Mbps/1 Mbps broadband is \$71.40.⁴ These were mentioned in the meeting as tools the Commission could use to determine the appropriate level of support for Lifeline broadband service, but do not represent the amount of support necessary for the inclusion of broadband.

GRTI discussed the importance of using universal service to advance both the availability and affordability of broadband.⁵ Ensuring sufficient support is available through the high-cost program in conjunction with sufficient support in the Lifeline program will best promote deployment and adoption on Tribal lands. As such, GRTI reiterated that facilities-based carriers should receive the enhanced Lifeline support so they can continue to deploy, build, and maintain infrastructure on Tribal lands.⁶ GRTI believes enhanced Lifeline can be part of promoting deployment to unserved Tribal areas while also providing an opportunity to increase adoption rates.

Please direct any questions to the undersigned.

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³ *Bridging the Digital Divide for Low-Income Consumers et al.*, WC Docket No. 17-287 et al., Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of inquiry, FCC Circ 1711-05, paras. 121-122.

⁴ *GRTI Lifeline comments* at 11.

⁵ Comments of Gila River Telecommunications, Inc. at 13-14.

⁶ *Id.* at 15.