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December 13, 2016

**Via ECFS**

Marlene Dortch, Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

**Re: WC Docket No. 10-90**

Dear Ms. Dortch:

On December 11, 2017, National Tribal Telecommunications Association President Godfrey Enjady and Alan Morel with Mescalero Apache Telecommunications, Inc., Doug Kitch with Alexicon, and the undersigned met with Chairman Ajit Pai and his wireline adviser Jay Schwartz, Barbara Esbin with the Consumer and Government Affairs Bureau, and Matthew Duchesne and Janet Sievert with the Office of Native Affairs and Policy.

The group discussed the critical nature of relief from the operational expense caps imposed in the March 2016 Universal Service Fund reforms. Mescalero Apache Telecommunications notes the USF reforms have resulted in unintentional consequences related to operational costs incurred by carriers serving Tribal lands, of which the record is clear and comprehensive. In Mescalero Apache Telecommunications’ case, financial forecasts show that the company will be cash flow negative at the end of 2019 unless immediate and vital steps are taken with respect to providing relief. The forecasts assume normal operations of the company, keeping operating costs flat in all the forecast years, noting this is a result of the budget control mechanism coupled with the necessary expenses incurred by the operation of an Incumbent Local Exchange Carrier serving on Tribal lands.

Pursuant to Section 1.1206(b) of the Commission’s Rules, this submission is being filed for inclusion in the public record of the referenced proceeding.

Sincerely,

/s/ Randy Tyree

Randy Tyree

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