GRTyree Consulting

Washington, DC

202-203-8962

December 20, 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 20, 2017, the undersigned, representing the National Tribal Telecommunications Association and Mescalero Apache Telecommunications Inc., in separate meetings met with Travis Litman, chief of staff for Commissioner Rosenworcel, and Claude Aiken, wireline advisor for Commissioner Clyburn, to discuss the need for operational expense relief for some Tribal telecommunications companies.

They 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

GRTyree Consulting

1338 South Carolina Ave., SE

Washington, DC 20003

202-203-8962

[tyree\_r@verizon.net](mailto:tyree_r@verizon.net)