



LEECH LAKE TELECOM

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July 22, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Ex parte presentation
FCC 15-71
WT Docket No. 11-42
WT Docket No. 09-197
GN Docket No. 10-90

Dear Secretary Dortch,

On behalf of the Leech Lake Telecommunications Company, a wireless telecommunications company owned by the Leech Lake Band of Ojibwe and serving broadband in tribal lands, I express the Board of Director's opinions and wishes with the FCC's "Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and order, and Memorandum opinion and order."

The Leech Lake Telecommunications Company does support the minimum service standard for broadband taking into consideration lack of affordable broadband in tribal lands. The National School Lunch Program is an effective means to identify eligibility for the E-rate program and if the information were shared on a map it will address the need of providers to locate and ensure that Lifeline eligible households are aware of the opportunities provided by the Lifeline program.

The Lifeline program could best be structured to provide support for broadband in tribal lands by ensuring that lifeline supported facility based companies provide evidence of facility build in tribal lands that support low income households with affordable broadband. The Leech Lake Band of Ojibwe tribal citizens have been exploited with non-facility based companies providing mobile services where mobile transmission capacity is non-existent; leaving the consumer with a service that does not serve them in their homes.

The minimum service levels for fixed and mobile voice and broadband service that Lifeline providers must offer to all Lifeline customers in order to be eligible to receive Lifeline reimbursement in tribal lands must differentiate levels of broadband services of wireless versus fiber. The Leech Lake Telecommunications Company provides quality broadband service in its capacity with wireless technology in extremely geographic remoteness tribal lands sparsely populated and with few businesses; recognizing its minimum service levels are not competitive with fiber service levels due to the nature of the capacity of both. It is not feasible of a small company to provide fiber service to the

tribal lands of the Leech Lake Band of Ojibwe, population of 53% below poverty level and low density population; but with a wireless service and a marketing plan to address the low income households it is feasible.

The Leech Lake Telecommunications Company does support the continued focus enhanced Tribal support to tribal lands and should not exclude urban, suburban, or high density areas on tribal lands due the historical nature of the discrepancies of access to telecommunications in tribal lands across the country. Access is not affordable to low income families in tribal lands due to the many obstacles such as distance to work, school and health care. Low income families who reside in urban and suburban areas within tribal lands also experience many other factors - lack of jobs, discrimination, and other social factors leading.

The obligation to confirm Tribal residency should rest with the provider. If a provider does not possess knowledge of tribal lands or lacks permission to conduct utilitarian business in the jurisdictional tribal lands by engaging the tribal leadership and tribal utilities commission then the provider should not be providing services in tribal lands and seeking Lifeline and Linkup support. This comment leads back to basic tribal engagement policies. The Leech Lake Telecommunications Company provides wireless telecommunications today in tribal lands because other telecoms have failed to meet the needs of low income citizens in tribal lands and failed to engage the tribal leadership of the Leech Lake Band of Ojibwe to identify what is tribal residency.

The Leech Lake Telecommunications Company does support tribal consultation whenever there is a question of defined tribal lands as each nation's lands are defined differently across the nation. Each Tribal nation has its own historical jurisdiction and rights identified by treaties with the United States. The definition of land base for tribes should always include the Tribal nation leadership and the Office of Native Affairs and Policy.

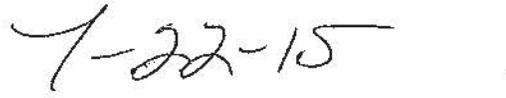
In conclusion, there is a lack of infrastructure funding to support tribal entities who do provide broadband services to their tribal lands; the FCC Office of Native Affairs and Policy shall be instrumental to tribal nations to make policies that set aside funding for tribal entities when the federal funding comes to the states for infrastructure to rural communities ensuring such funding reaches tribal nations.

Sincerely,



Sally Fineday, Business Manager

Leech Lake Telecommunications Company, LLC



Date