

**GREGORY W GUICE**  
+1 202.887.4565/fax: +1 202.887.4288  
gguice@akingump.com

September 11, 2015

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: WC Docket No. 10-90

Dear Ms. Dortch:

On September 3, 2015, Doug Kitch, Vince Weimer of Alexicon Consulting and I met via conference call with Carol Matthey, Suzanne Yelen, Theodore Burmeister, Christopher Cook, and Joe Seresso of the Wireline Competition Bureau to discuss model inputs and possible effects they have on generating support levels for tribal lands. We explained that there are four variables that may not take into account the unique circumstances that arise on tribal lands: mapping (population location and density), plant mix, line sharing and cost of materials and labor. We also discussed the Tribal Broadband Factor developed by NTTA member companies and its use as a component of a reformed embedded cost mechanism to provide additional, targeted support to promote the deployment of broadband to tribal lands served by rate-of-return carriers.<sup>1</sup> The Tribal Broadband Factor is designed to be a component that can be applied to the various proposals put forward by NTCA, US Telecom and others for a stand-alone broadband mechanism. I reiterated GRTI and NTTA's willingness to continue working with the Commission to adapt the factor as the Commission's reform plans develop.

This disclosure is made in compliance with 47 C.F.R. §1.1206

Best regards,

/s/ Gregory W. Guice  
Gregory W. Guice

*Counsel, Gila River Telecommunications, Inc.*

---

<sup>1</sup> NTTA Proposal for a Tribal Broadband Factor, WC Docket No. 10-90, available at <http://apps.fcc.gov/ecfs/document/view?id=60001090742> (filed June 19, 2015).