

*Via Electronic Comment Filing System*

November 2, 2015

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. and the National Tribal Telecommunications Association Related to Connect America Fund, WC Docket Nos. 10-90*

Dear Ms. Dortch:

By this letter, and pursuant to Sections 1.1206 of the Commission's rules,<sup>1</sup> the undersigned representing Gila River Telecommunications, Inc. ("GRTI") and Patrick Halley, Counsel for the National Tribal Telecommunications Association ("NTTA") met with Irene Flannery, Acting Chief of the Office of Native Affairs and Policy.

During the meeting, we discussed the substantial broadband infrastructure gap on Tribal lands and the need for a targeted effort by the Commission to address this gap as it considers reforming high-cost universal service program rules applicable to rate-of-return carriers. We noted that there are unique circumstances that drive up costs including population density, terrain, rights-of-way and cultural clearance costs. We requested that the Commission adopt a proposal submitted by NTTA on June 19, 2015 to develop a Tribal Broadband Factor ("TBF"), a simple approach to targeting additional support to Tribal lands for infrastructure investment,<sup>2</sup> and expressed a willingness to further discuss the details of the proposal to ensure its inclusion in any broader rule changes the Commission may adopt.

We reiterated that the Commission and others have noted a persistent deficit of achievement in bringing broadband to tribal lands and that the rate-of-return reform effort that is underway at the Commission offers a unique opportunity to address that deficit.<sup>3</sup> NTTA and GRTI reiterated that they would welcome a dialogue with the Commission on the details of a

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<sup>1</sup> 47 C.F.R. § 1.1206.

<sup>2</sup> Letter from Godfrey Enjady, President National Tribal Telecommunications Association, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (filed June 19, 2015).

<sup>3</sup> Broadband Opportunity Council, Report and Recommendations Pursuant to the Presidential Memorandum on Expanding Broadband Deployment and Adoption by Addressing Regulatory Barriers and Encouraging Investment and Training at ¶¶ 6, 16 (2015) (*stating* "[s]ome parts of the country, mostly rural and Tribal lands, are connectivity deserts – regions with little or no access to broadband – or 'parched' with broadband coverage inadequate to meet community needs" and that "[w]hile many communities around the country would benefit from Federal support in addressing connectivity issues, Tribal areas face particular challenges...creating yet another barrier for education, healthcare and economic development.").

TBF and how to implement such a proposal within the contours of the broader rate-of-return reform effort.

Please direct any questions to the undersigned.

Gregory W. Guice, Esq.  
Akin Gump Strauss Hauer and Feld LLP  
1333 New Hampshire Avenue, NW  
Washington, DC 20036  
(202) 887-4565  
*Counsel for Gila River Telecommunications, Inc.*