

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554**

In the Matter of)	
Connect America Fund)	WC Docket No. 10-90
Universal Service Reform – Mobility Fund)	WT Docket No. 10-208

**STANDING ROCK TELECOMMUNICATIONS
REQUEST FOR LIMITED WAIVER AND EXTENTION
OF MOBILITY FUND PHASE 3 DEADLINE**

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Standing Rock Telecommunications (“SRT” or “Company”) hereby requests an extension until June 30, 2016 to complete the network construction and drive test reporting for all the Tracts for which SRT was approved for to build its network in the Tribal Mobility Fund. The request for six months will allow SRT to further drive test its network to ensure coverage on the road miles in approved Tracts and also provides SRT the opportunity to continue to build out the network to cover additional road miles within the Tract.

SRT is a tribal owned telecommunications company servicing the Standing Rock Reservation in North Dakota and South Dakota. SRT was granted 4 Tracts (388007, 388008, 398001, and 398002) as part of the Tribal Mobility Fund with a due date of completion of December 24, 2015. SRT received the first round of funding in December 2013 and started construction of the network. Building a 3G and LTE network in one of the most rural areas of the country is difficult, but SRT has made great progress in constructing the 3G and LTE network and has started to bring high quality wireless telecommunications services to the residents of the reservation area. SRT has successfully filed for phase 2 funding for each of its Tracts indicating that it has been able to cover at least 50% of the eligible road miles that make up the Tract. Those funds from phase 2 were received partially in September of 2015 and the balance in November of 2015, leaving less than a month to complete the required construction to get to 75% of the eligible road miles in each tract. The delay in receiving those funds severely slowed down the construction of the network on the reservation and forced SRT to slow down the construction to wait on the funds from USAC.

Bringing mobile voice and broadband to unserved areas of America is a worthwhile investment, but it may take longer than the Commission expected. SRT is making great progress in constructing a high quality, reasonably priced 3G and LTE wireless network that is already

bringing wireless service to customers that were not able to obtain service due to no coverage by any wireless provider.

SRT has completed the majority of the construction that it is going to be able to do to cover the majority of the road miles within the Tracts under the Tribal Mobility Fund. SRT has been slowed down by the delay in the funding for Phase 2 as well as the fact that many of the road miles that are included in the Tracts are undrivable. SRT has discussed this issue with USAC and the Company has been instructed to provide proof that the roads are undrivable. SRT is in the process of driving the roads to take pictures showing that the roads are not drivable and no drive test could be performed over those undrivable miles. SRT is working with its construction provider New Core Wireless to us Prediction Maps to be able to show that the areas are being covered, but a drive test of those areas was not possible. SRT needs more time to complete the Prediction Maps and to gather the evidence showing that the roads are not drivable.

SRT would also like the extension to be able to complete some additional cell sites that would expand coverage to more areas of the reservation and expand wireless services to those residents who are unable to obtain wireless telecommunications services at this time due to the rural area they live in not having a wireless carrier that has coverage. These new sites are very important to reservation as they will greatly reduce the areas that do not have any coverage at all and will allow more residents to obtain service.

There is good cause to grant this extension. SRT has demonstrated diligent and persistent efforts to complete the construction of its new 3G and LTE network in the Tracts from the Tribal Mobility Fund and has made great progress in bringing service to an underserved population. SRT has not asked for an extension in the past and has filed its updates with USAC consistently and on time. An additional six months extension of time to complete the testing and to develop a

few additional sites is a reasonable request given the difficulties of building a wireless telecommunications network in one of the most rural areas of the United States in two and a half years instead of the two year deadline set by the FCC. SRT is committed to completing the testing and the build out within this six month extension.

Pursuant to Section 1.3 of its rules, the Commission may waive any provision of the rules for good cause or where, due to special circumstances, deviation from a rule would better serve the public interest and the Commission's purposes than strict enforcement of the rule. The Commission can also take into account other considerations such as hardship when determining whether to grant a waiver. SRT has demonstrated that the delay in Phase 2 funding was a hardship that slowed down the deployment of additional sites as the Company would have less than 30 days to meet 75% coverage of all the eligible road miles which is unreasonable. SRT has made great efforts to meet the deadline, but is unable to provide the Prediction Maps for the undrivable roads and the evidence that USAC stated they needed in a November 2015 conference call.

SRT is still working hard to deploy additional sites to be able to cover more of the reservation area at great financial costs to the Company. Without the extension of time to complete the 690 that is due December 24, 2015, SRT would not receive any additional funding for the project, but it would also be required to pay back the earlier phase 1 and phase 2 funds plus a penalty. SRT would be devastated financially in the event that the FCC does not approve the extension, being required to pay back funds it has already received plus a penalty. SRT customers would lose the only wireless telecommunications service that is available in the area and the development of wireless coverage on the Standing Rock Reservation would be halted. These results would be contrary to the public interest.

Enforcement of the Commission's deadline would slow down the development of wireless telecommunications services to areas that are only covered by SRT's wireless service meaning that FCC failed to meet its goal of bringing 3G and LTE wireless telecommunications service to all Americans. In addition, the devastation that the loss of the only wireless telecommunications provider on a large part of the Standing Rock Reservation would devastate the economy of the reservation itself.

SRT is not the only winning bidder in the Mobility Fund that has filed for an extension as the two year deadline was too short to complete 3G and LTE wireless network builds in some of the most rural areas of the country. The FCC's goal of quickly deploying 3G and LTE wireless service was a worthy goal, but the two year deadline was unreasonable. SRT is only requesting an additional 6 months to complete its project, which by all definition would be a quick deployment of a 3G and LTE wireless network taking only two and a half years versus the two year deadline set by the FCC. The Mobility Fund was a great program to expand service to underserved and unserved areas of the United States, but not allowing for some flexibility in the deadline is not in the public interest.

SRT respectfully requests that the FCC grant this extension so that the Company can complete the necessary drive testing, Prediction Maps, and to continue to add some addition sites that will expand quality and affordable 3G and LTE wireless services to the residents of the Standing Rock Reservation.

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Manger