



February 16, 2016

Marlene Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Connect America Fund, WC Docket, No. 10-90*

Dear Ms. Dortch:

Fort Mojave Telecommunications, Inc. (“FMTI”), SAC 452200, is a tribally chartered RLEC established in 1988 when other providers failed to provide adequate telecommunications services to customers on the Fort Mojave Indian Reservation. On July 29, 2015, the Wireline Competition Bureau identified FMTI as one of 15 RLEC study areas subject to a 100 percent overlap by an unsubsidized competitor based on FCC Form 477 data.¹ On August 21, 2015, FMTI filed comments providing unrefuted evidence that two competitors listed by the FCC - Suddenlink and Transworld - have never satisfied Tribal law requirements to offer services within FMTI’s study area and therefore cannot provide any services within FMTI’s study area.²

The A-CAM version 2.1 clearly illustrates that the model based support calculated for FMTI is still negatively impacted by the inaccurate Form 477 data submitted by Suddenlink and Transworld.³ Accordingly, we respectfully request that the FCC’s Wireline Competition Bureau and CostQuest correct the A-CAM to reflect FMTI’s lack of competitive overlap in any census block in its study area. This correction would provide FMTI with the same accurate A-CAM support amounts as all other RLECs, which is necessary to enable an informed election on whether to accept model based support.

Thank you in advance for correcting this matter.

¹ Connect America Fund, WC Docket No. 10-90. Public Notice Wireline Competition Bureau Publishes Preliminary Determination of Rate-Of-Return Study Areas 100 Percent Overlapped by Unsubsidized Competitors. (Rel. July 29, 2015).

² Connect America Fund, WC Docket No. 10-90. Comments of Fort Mojave Telecommunications, Inc.; (filed August 21, 2015). On December 14, 2015, the FCC issued an order resolving this issue in Agate’s favor.

³ Connect America Fund, WC Docket No. 10-90. Public Notice Wireline Competition Bureau Releases Alternative Connect America Cost Model Version 2.1 and Illustrative Results for Potential Use in Rate-Of-Return Study Areas. (Rel. December 17, 2015)

Sincerely,

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