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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

**Re: Ex Parte Notification
WC Docket No. 11-42**

Dear Ms. Dortch:

On behalf of Smith Bagley, Inc. (“SBI”), we write to provide additional information on SBI’s ability to deliver broadband services on remote Tribal Lands using the Commission’s E-Rate program.

As mentioned in our recent ex parte letter of March 14, 2016, Lifeline has enabled low-income Tribal Households to access affordable telephone, text messaging and basic data services, while providing SBI the ability to invest in new cell sites and technology upgrades. SBI has also acquired additional spectrum, making it possible to upgrade to 4G LTE in the future on Tribal Lands.

SBI is now leveraging investments made possible with Tribal Lifeline to connect schools and libraries issuing RFPs through the E-Rate program. At every SBI tower served by fiber, it can connect a school with a point-to-point microwave link, providing reliable and high-quality broadband, in areas that oftentimes have no other access. These low-cost connections have the additional benefit of using E-Rate program funds efficiently, increasing the number of E-Rate connections available nationwide.

As set forth in its March 14 letter, SBI plans to construct new cell sites on Tribal Lands if the Commission can add funds to the Tribal Lifeline program for facilities-based carriers. All of

these sites will be in Tribal areas lacking access to telecommunications services that are reasonably comparable to those in urban areas.

SBI has identified dozens of potential locations where E-Rate opportunities can leverage Lifeline funds, making broadband available to thousands of students and others using public facilities. These connections are important for three reasons:

First, in remote Tribal Lands, there is a paucity of commercial activity where free WiFi is available, making E-Rate broadband connections critical to providing access for educational purposes.

Second, in the remote areas SBI is targeting, mobile broadband is the only way that most students will have to access the Internet at home. Many of these remote areas do not have wireline facilities capable of delivering broadband to the home. Students leaving school do not have other free public WiFi, such as at a local coffee shop or restaurant, to access the Internet. For them, a mobile broadband connection at home is the primary source of Internet access.

Third, many Tribal households cannot afford multiple subscriptions to telecommunications services, making the combination of a smart phone and a WiFi connection at school a reasonable solution to the “homework gap” that the Commission seeks to close.

In closing, SBI is prepared to demonstrate that its investments on Tribal Lands will greatly improve the availability of 4G LTE service, and leverage program funds to expand broadband at schools and libraries through the E-Rate program. Adding support to Tribal Lifeline is critical to enabling carriers such as SBI to extend these services into the most remote portions of our nation’s Tribal Lands.

Should you have any questions, please contact undersigned counsel directly.

Sincerely,



David A. LaFuria
Counsel for Smith Bagley, Inc.

cc (via e-mail):

Hon. Thomas Wheeler
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Hon. Jessica Rosenworcel
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