

November 19, 2007

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Notice of Oral Ex Parte Presentation
CC Docket No. 96-45, DA 07-4592 and
CC Docket No. 80-286, DA 07-3809

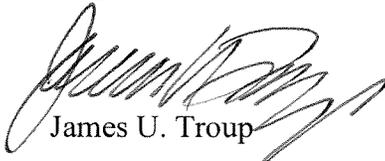
Dear Ms. Dortch:

Today, the following representatives of Gila River Telecommunications, Inc. ("GRTI"), Cecil Antone, Michael Scully, Douglas Kitch, Eric Jensen, and the undersigned met with Jennifer McKee, Alex Minard, and Chris Riley of the Telecommunications Access Policy Division to discuss GRTI's two pending waiver petitions affecting GRTI's federal universal service fund ("USF") support.

The oral presentation was consistent with GRTI's petition filed on October 26, 2007 asking the Commission to accept GRTI's Section 54.209 report, which was filed only a few days late, and its November 21, 2006 petition asking for a waiver of the freeze on Part 36 category relationships to permit GRTI to accurately report the costs associated with its current network configuration for purposes of receiving federal USF support. GRTI's representatives stressed that the receipt of the USF support requested in the pending petitions is critical to the provision of basic telecommunications services to the many low income members of the Gila River Indian Community ("Tribe"). They also discussed how the public interest would be served by granting the pending waiver requests and making it possible for GRTI to continue to extend its network to reach the underserved portions of the Reservation. The attached document was distributed at the meeting.

Pursuant to section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced dockets. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,



James U. Troup

cc: Jennifer McKee
Alexander Minard
Chris Riley

PRESENTATION OF GILA RIVER TELECOMMUNICATIONS, INC.
CONCERNING PENDING WAIVER REQUESTS FOR USF SUPPORT

November 16, 2007

A. BACKGROUND

- 1) Gila River Telecommunications, Inc. ("GRTI") Is Wholly-Owned By The Gila River Indian Community (The "Tribe") To Provide Telecommunications Services Upon Tribal Land.
- 2) The Gila River Indian Reservation Is Located On Over 372,500 Acres In Arizona.
- 3) The Tribe Has Approximately 18,273 Members.
- 4) Population Density Is Low With 5 Homes Per Square Mile.
- 5) GRTI Has Increased Access To Telecommunications Services By Tribe Members And Businesses By Approximately 650 Percent.
- 6) GRTI's Loop Costs Are 506% Of The National Average.

B. ADVERSE IMPACT

- 1) Taking Universal Service Support Away From GRTI Would Be Fundamentally Unfair To The Tribe And Undermine Its Efforts To Improve Access To Telecommunications Services For Its Tribal Community.
- 2) A Significant Portion Of The Tribe's Members Receive Lifeline Support, And Therefore, Disallowing USF Would Devastate An Already Poor Community.
- 3) Denying USF For 1st Quarter 2008 Would Reduce GRTI's Annual Regulated Revenue By 13-15%. This equates to a loss of \$300,000 per month.
- 4) A Loss Of USF For 1st Quarter 2008 Would Deprive The Tribe Of Funds That Are Critical To The Provision Of Basic Telecommunications Services On The Reservation.
- 5) Such A Loss In USF Would Likely Require GRTI to terminate several of its employees, which would inflict further unemployment on an already impoverished community.

C. SECTION 54.209 REPORT

- 1) On October 10, 2007, USAC Notified GRTI That It Would Not Receive Universal Service Support For The First Quarter Of 2008 Because It Had Not Filed A Section 54.209 Report.
- 2) On October 18, 2007, GRTI Filed Its Section 54.209 Report With The FCC.
- 3) On October 26, 2007, GRTI Filed A Petition For Waiver Of The Section 54.209 Reporting Deadline.
- 4) GRTI Asks The Commission To Accept Its Section 54.209 Report And Direct USAC To Continue To Provide GRTI With USF Without Interruption.
- 5) Taking USF Away From GRTI Would Have A Disproportionate Adverse Impact On GRTI And The Members Of The Tribe To Which It Provides Service.
- 6) By Comparison, The Small Delay In Filing The Section 54.209 Report Is A Minor Technicality.
- 7) A Grant Of The Waivers Requested Would Serve The Public Interest By Enabling GRTI To Continue To Provide Service To Indigent Member Of The Tribe and Extend Its Network To Reach Underserved Portions of The Reservation.