



Gila River Telecommunications Inc.

November 26, 2007

Mr. Jeremy D. Marcus
Chief, Telecommunications Access Policy Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Petition of Gila River Telecommunications, Inc. to Unfreeze Part 36
Category Relationships, CC Docket No. 80-286 (filed November 21,
2006)

Dear Mr. Marcus:

This supplemental letter provides clarification to Gila River Telecommunications, Inc.'s (GRTI's) Part 36 Category Relationships Freeze Petition filed on November 21, 2006 in the above-captioned docket ("Petition"), and explains GRTI's position on two issues in its Petition: 1) effective date of petition request; and 2) twenty four month open NECA window.

Effective Date of Petition

In its Petition, GRTI states, "...GRTI respectfully requests that this waiver be effective as of June 30, 2006."¹ In accordance with Section 36.612 of the Commission's rules, information filed in the annual fiscal period ended June 30, 2006 for the High Cost Loop (HCL) Universal Service Fund determines the amount of revenue that will flow nine months following the data period, or April 2007. Any change in the federal USF support that GRTI actually receives will, therefore, not occur until several months subsequent to the filing of GRTI's Petition. In this respect, the date that HCL revenues will flow to GRTI is April 2007 and not June 30, 2006. GRTI believes this clarification is important to further show not only the *de minimus* impact on the Universal Service Fund by granting GRTI's petition but also that GRTI is not requesting HCL revenues to flow to GRTI prior to April 1, 2007.

Twenty Four Month Window

In its supplemental filing dated August 30, 2007 GRTI states: "Consistent with that common practice, GRTI requests that it be allowed to file corrected account information for a period of no more than twenty-four months prior to the date on which its Petition is granted, and to receive Universal Service support consistent with its corrected accounting for that period."² In

¹ Petition at 17.

² Supplement to Petition of Gila River Telecommunications, Inc. to Unfreeze Part 36 Category Relationships, CC Docket No. 80-286 (filed August 30, 2007).



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combination with the effective date clarification above, GRTI is again *not* requesting that HCL revenues flow to GRTI twenty four months prior to the June 30, 2006 effective date; instead, GRTI is requesting that it be allowed to unfreeze its category relationships as of June 30, 2006 so that HCL revenues resulting from GRTI's actual Part 36 categorization flow to GRTI beginning in April 2007. The clarification related to this issue is equally as important to show that GRTI is only requesting an effective date to include the data for the June 30, 2006 annual fiscal period and not requesting retroactive revenue realization.

Quantifying the Results

Based on the above clarifications and previous supplemental filings (including calculations), GRTI estimates the impact on the Universal Service Fund to be as follows:

2007 - April through December (9 months): \$900,000

2008 and thereafter – January through December (Annually): \$1,200,000

GRTI respectfully requests the Commission's consideration of the above during its deliberation on GRTI's Petition. GRTI is serving a copy of this letter on all parties that filed comments or reply comments concerning GRTI's Petition.

Sincerely,

A handwritten signature in blue ink that reads "Michael H. Scully". The signature is written in a cursive style.

Michael H. Scully
CEO/General Manager

Cc: OPASTCO
NTCA