

April 2, 2008

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: CC Docket No. 96-45 Gila River Telecommunications, Inc. Petition for Waiver of Section 54.209 of the Commission's Rules and Protective Petition for Waiver of Section 54.209 of the Commission's Rules

Dear Ms. Dortch:

The two above-captioned petitions for waiver submitted by Gila River Telecommunications, Inc. remain pending before the Commission. These waiver petitions were deemed necessary as a result of Gila River's untimely filing of the data required by Section 54.209 of the Commission's rules, both with respect to the required October 2006 filing and the required October 2007 filing. The circumstances of those late filings are described in the waiver petitions and will not be repeated here. As noted in a February 29, 2008 letter (filed jointly with Saddleback Communications), prompt action on these waiver requests is of critical importance to Gila River since the Universal Service Administrative Company is withholding high cost support to Gila River until the Commission acts on the waiver petitions. The unavailability of high cost support to which the company is otherwise entitled is having an adverse impact on its cash flow position and on its ability to provide affordable high quality telecommunications service to the residents of the Gila River Indian Reservation in Arizona.

By this letter, Gila River wishes to inform the Commission on the record that it has implemented a compliance plan to prevent future failures to make timely regulatory filings. The details of that compliance plan are set forth in the affidavit of Michael H. Scully, Gila River's Chief Executive Officer, which is attached to this letter. That plan was implemented shortly after learning of the failure to file the 2007 report in a timely manner and is now in place.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If you have questions regarding this letter or any other aspect of Gila River's petitions for waiver of Section 54.209, please contact its undersigned counsel.

Sincerely,



Mitchell F. Brecher

**AFFIDAVIT**

**STATE OF ARIZONA**

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**CC Docket No. 96-45**

**GILA RIVER INDIAN COMMUNITY** )

BEFORE ME, the undersigned authority on this day personally appeared Michael H. Scully of Gila River Telecommunications, Inc., who, on his oath, deposed and said:

My name is Michael H. Scully. I am employed by Gila River Telecommunications, Inc. (Gila River) in the position of Chief Executive Officer. In this position, I am personally familiar with the Federal Universal Service program and am responsible for Gila River's status as an Eligible Telecommunications Carrier and for Gila River's compliance with the requirements of the program, including compliance with Federal Communications Commission regulations regarding submission of periodic data and reports.

I am aware that Gila River's data submission required by Section 54.209 of the FCC's rules and regulations was filed several days after the October 1, 2007 filing date, and that a similar submission which had been due on October 2, 2006 was not filed until after Gila River had been notified by the Universal Service Administrative Company on January 31, 2008 of the failure to file the 2006 report. Presently pending before the FCC are petitions for waiver of the Section 54.209 filing requirement with respect to the late-filed 2006 and 2007 filings.

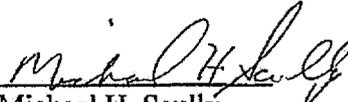
The purpose of this affidavit is to describe the procedural steps which I have directed to be taken in order to ensure future compliance with all applicable regulatory filings, including those required by Section 54.209 of the FCC's rules. These procedures include the following:

1. A company employee who reports directly to the Chief Executive Officer will be responsible for all regulatory filings. That employee will establish a calendar system to keep track of all required filings.

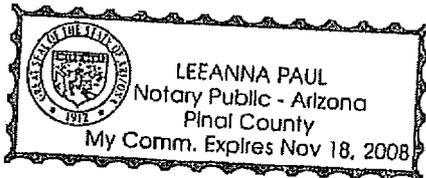
2. If Gila River has any questions or is unsure of the applicability of such rules and filing requirements, that employee will be instructed to immediately contact the company's outside legal counsel and/or regulatory compliance consultants as appropriate.

3. Gila River will be implementing a Zero Tolerance Policy for legal and regulatory compliance. Any violation of an applicable requirement will subject the employee responsible for compliance to immediate disciplinary action.

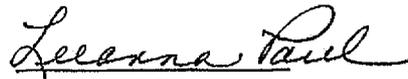
Gila River has been an Eligible Telecommunications Carrier since 1998. Since that time, Gila River's policy has been to comply with all applicable requirements.

  
Michael H. Scully

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned authority, on this day of April 2008.



SEAL:

  
Notary Public  
State of Arizona