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January 24, 2012

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

Re: Notice of Permitted *Ex Parte* Communications  
WC Docket No. 11-42  
CC Docket No. 96-45  
WC Docket No. 03-109

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Dear Ms. Dortch:

On behalf of Gila River Telecommunications, Inc. (“GRTI”), a telecommunications carrier wholly-owned and operated by the Gila River Indian Community, I left a voicemail today with Angela Kronenberg, Commissioner Mignon Clyburn’s Wireline Legal Adviser, relating to one of the issues in the above-referenced docket on which GRTI commented. Specifically, GRTI believes that a one Lifeline subscription per eligible residence rule for Lifeline voice service is inadequate to address the communications needs on tribal lands. Instead, GRTI urges the Federal Communications Commission to expand eligibility to one Lifeline subscription to every eligible residence plus one additional subscription to one additional adult in tribal households below the federal poverty line.

GRTI believes Lifeline eligibility should be expanded due to the unique circumstances on tribal lands. For example, in the Gila River Indian Community, which is located on 582 square miles of land and has less than 12,000 Native Americans living on the reservation, approximately 84% of GRTI’s local telephone subscribers currently qualify for Lifeline and Link Up, including 91% of those subscribers 65 and older. Without expansion of the Lifeline eligibility requirements to provide one additional subscription to one additional adult in tribal households below the federal poverty line, an elderly household member living many miles from the nearest public safety service may be imperiled in the event of an emergency if he or she does not have the means to make an emergency call. Since younger members of households often take Lifeline supported mobile phones to work, the expansion of the Lifeline eligibility requirements will help ensure health and safety – the primary purpose of the Lifeline program – on tribal lands.

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Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. Please direct any questions regarding this submission to the undersigned counsel.

Sincerely,

/s/  
Tom W. Davidson

cc: Angela Kronenberg, Esq.