



Gila River Telecommunications, Inc.
Proudly serving the Gila River Indian Community since 1988

**“Breaking Barriers for
Broadband Service”**



Gila River Telecommunications, Inc.

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June 29, 2012

Ms. Marlene H. Dortch
Commission Secretary
Federal Communications Commission
445 12th Street, S.W. Room TW-A325
Washington, D.C. 20554

Re: Application to Participate in the Broadband Adoption Lifeline Pilot Program,
WC Docket 11-42

Dear Ms. Dortch:

It is with great interest that Gila River Telecommunications, Inc. (“GRTI”) submits the following application for participation in the Broadband Adoption Lifeline Pilot Program.

The below information is offered in response to Section I of the Wireline Competition Bureau’s *Public Notice*¹ announcing the application criteria for this program. The certifications required under Section II of the *Public Notice* are attached to this application.

(A) GRTI as the Eligible Telecommunications Carrier (“ETC”), is owned and operated by the Gila River Indian Community (“GRIC”), a federally recognized Tribe, in the State of Arizona. GRTI has two subsidiary companies, which are Native Technology Solutions (“NTS”), a customer premise equipment provider and Alluvion Communications, a traditional Competitive Local Exchange Carrier. Our physical location is 7065 West Allison Road, Chandler, Arizona 85226. GRTI’s FCC Registration Number (“FRN”) is 4052791 and Study Area Code (“SAC”) is 452179. We are designated to provide Lifeline service in the State of Arizona and specifically to service 568 square miles of Tribal land, the Gila River Indian Community.

(B) Description of proposed pilot project

1. The geographic area(s) in which GRTI will offer the broadband plan for the project, census data on the income levels of the residents of the following specific geographic areas are:

¹ *Wireline Competition Bureau Announces Application Procedures and Deadline for Applications to Participate in the Broadband Adoption Lifeline Pilot Program*, at 5-8, WT Docket No. 11-42, Public Notice, DA 12-683 (rel. Apr. 30, 2012) (“*Public Notice*”).



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- The Gila River Indian Community is located on census tracts 9410, 9411, 9412, and 9413. The income levels of the residents of these tracts are as follows:²

	Census Tract 9410	Census Tract 9411	Census Tract 9412	Census Tract 9413
Median Household Income	\$ 17,188	Not available	\$51,157	\$31,892
Mean Household Income	\$33,615	Not Available	\$58,412	\$44,895

- The median household income in the Gila River Indian Community is \$28,779. The mean household income in the Gila River Indian Community is \$38,131.³
- The geographic areas will cover Tribal land only.

2. For the broadband service, we anticipate using our existing Calix Access equipment utilizing three different methodologies; 1) ADSL2+ technology in areas with copper cabled facilities in a Fiber-to-the-Node configuration utilizing 8,000’ target loop lengths, 2) Fiber-to-the-Home utilizing Gigabit Passive Optical Network (“GPON”) with Active Ethernet technology, and 3) Wireless Point-to-Multipoint by Cambium for remote and isolated homes.

3. Currently, GRTI offers our residential customers broadband at a monthly rate of \$53.19 for 1.5-3.8Mbps download speeds and a minimum of 1Mbps for upload speed. In order to comply with the NECA tariff, we cannot offer a download speed higher than 4Mbps without having to increase the already high price of this offering.

² AMERICAN FACTFINDER, 2006-2010 American Community Survey 5-Year Estimates, Census Tracts 9410, 9411, 9412, & 9413, http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_10_5YR_DP03&prodType=table (last visited June 28, 2012).

³ AMERICAN FACTFINDER, 2006-2010 American Community Survey 5-Year Estimates, Gila River Indian Reservation, AZ, http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_10_5YR_DP03 (last visited June 28, 2012).



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GRTI proposes five offerings: 1) 1.5-up to 4.8Mbps for download speeds/1Mbps or more for upload speed, 2) up to 5Mbps for download speeds/1Mbps or more for upload speed, 3) up to 10Mbps for download speeds/1Mbps or more for upload speed, 4) up to 15Mbps for download speeds/1Mbps or more for upload speed, and 5) up to 20Mbps for download speeds/1Mbps or more for upload speed.⁴ All the speeds offered are sufficient to provide access to key applications involving education, healthcare, and person-to-person communications and general access to information. However, the higher speed levels will allow for greater efficiency in regards to accessing opportunities for education, training and employment to enhance the quality of life for our people. Native American's have one of the highest high school dropout rates due to many social and economic factors that are direct effects of living in impoverished conditions for generations. Broadband service will allow for greater access to on-line schooling and employment seeking opportunities that currently don't exist on Tribal lands. The positive and constructive impact of access to broadband service at affordable rates could influence and change the healthy development of individuals and the tribal community overall for generations.

4. The following rates and speeds reflected in Groups 2-5 are offered only in this program. Currently, GRTI offers the rate and download/upload speeds reflected in Group 1. Therefore, GRTI is using the rate of \$53.19 as the baseline rate for each of the five groups. GRTI is considering either or both of the following proposed offerings:

GROUPS	PROGRAM CONCESSION	END-USER COST	DOWNLOAD SPEEDS	UPLOAD SPEEDS	*EQUIPMENT COST TO END-USER
Group 1	\$0	\$53.19/mo.	1.5-up to 4.8 Mbps	Minimum of 1Mbps	Not offered
Group 2	\$38.24	\$14.95/mo.	up to 5Mbps	Minimum of 1Mbps	Not offered
Group 3	\$33.24	\$19.95/mo.	up to 10Mbps	Minimum of 1Mbps	Not offered
Group 4	\$28.24	\$24.95/mo.	up to 15Mbps with computer	Minimum of 1Mbps	Offered at no cost
Group 5	\$23.24	\$29.95/mo.	up to 20Mbps with computer	Minimum of 1Mbps	Offered at no cost

⁴ GRTI is in the process of deploying Fiber-to-the-Home throughout the Gila River Indian Community, but not all residences have access to such services to date. For those residences with Fiber-to-the-Home broadband connections, upload speeds in excess of 1Mbps will be available. For those residences that do not yet have Fiber-to-the-Home broadband connections, minimum upload speeds of 1Mbps will be available.



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* GRTI will incur the cost of computers associated with this offering. This offering will depend on whether GRTI can successfully gain financial approval from the Gila River Indian Community to purchase the computers for this program.

GROUPS	PROGRAM CONCESSION	END-USER COST	DOWNLOAD SPEEDS	UPLOAD SPEEDS	*OPTIONAL EQUIPMENT COST TO END USER
Group 1	\$0	\$53.19/mo.	1.5-up to 4.8 Mbps	Minimum of 1Mbps	\$0 or \$31.25/mo.
Group 2	\$38.24	\$14.95/mo.	up to 5Mbps	Minimum of 1Mbps	\$0 or \$31.25/mo.
Group 3	\$33.24	\$19.95/mo.	up to 10Mbps	Minimum of 1Mbps	\$0 or \$31.25/mo.
Group 4	\$28.24	\$24.95/mo.	up to 15Mbps	Minimum of 1Mbps	\$0 or \$31.25/mo.
Group 5	\$23.24	\$29.95/mo.	up to 20Mbps	Minimum of 1Mbps	\$0 or \$31.25/mo.

* End-users will have the option to pay the monthly fee for a computer and the computer will become the end-user’s property if they complete a 12-month payment program. Computer purchase is not required. Customer has sole discretion to purchase or not purchase computer. The number of end-users purchasing a computer will be tracked, as well as those end-users that don’t purchase a computer, as well as why an end-user made a decision to purchase or not to purchase a computer. This data will be shared with the FCC WCB as empirical analytical data.

GRTI will be seeking the monthly subsidies for this program over a 12-month duration.



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The terms and conditions for individual participation will be as follows:

- Subscriber must qualify for this program under the similar qualifications as Enhanced Lifeline Telephone Service Assistance. The applicant must participate in one of the ten qualifying programs: (1) Bureau of Indian Affairs General Assistance, 2) Federal Public Housing Assistance Section 8, 3) Supplemental Nutrition Assistance Program (Food Stamps or SNAP), 4) Head start student in the home (income eligible), 5) Low Income Home Energy Assistance Program (LIHEAP), 6) Medicaid, 7) National School Lunch Program's free lunch program, 8) Supplemental Security Income (SSI), 9) Temporary Assistance for Needy Families (TANF) or Tribal TANF, or 10) Food Distribution Program on Indian Reservations) or have an annual income at or below 135% of the Federal Poverty Guidelines:

<u>Family Size</u>	<u>Annual Income</u>
1	\$15,080
2	\$20,426
3	\$25,772
4	\$31,118
5	\$36,464

For each additional person in the home add \$5,346 to income eligibility requirements.

- Information contained within the application for participation must have accompanying documents that are true and correct
- The address listed for service is the primary residence of the participant.
- The discount or concession will be billed in the name of the qualifying participant.
- Each household can only receive one discount or concession for broadband service even if the household acquires more than one broadband account.
- Only households that do not currently have broadband service will be eligible for the discount.



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5. The total amount of non-recurring fees GRTI is seeking to reduce or eliminate through a subsidy is \$25,225. This non-recurring fee would be for broadband service installation. Currently, it is GRTI's practice to waive the installation fee of \$25, which covers the cost of labor and equipment, if the subscriber agrees to and completes a one-year broadband Service Agreement. However, because we have no guarantee that these pilot program participants will continue with the program for one-year and if we have a participant come in during the program's 12-month period, they would not meet the one-year commitment. (Potential participants is 1,009 x \$25 installation = \$25,225)

6. GRTI is committed to extending broadband service to our residential customers specifically because we are owned and operated by the Gila River Indian Community and provide service to the enrolled members of this Federally Recognized Tribe with enormous social consciousness. Previous economic studies have assessed that the Gila River Indian Community tribal membership residing within the reservation boundaries, which is GRTI's service area, is approximately 12,500 with 8,000 housing structures. Almost 48% of the residents of the Gila River Indian Community live below the poverty line,⁵ and 31% of this population is unemployed. Given these dramatic statistics, GRTI is confident that we have a large pool of potential participants for the Lifeline Broadband Pilot Program and that the need for increased digital literacy within this particular population of people is paramount. 1,009 existing Lifeline customers do not have broadband service.

7. GRTI's proposed overall maximum funding amount for this project is \$323,001.16. This assumes a 100% program participation rate among eligible households in the Gila River Indian Community. Although this may be an unrealistic expectation, for budget purposes GRTI is requesting this proposed amount for maximum funding. GRTI plans to take the 1,009 existing Lifeline voice customers without broadband service and split them into five groups. This would put approximately 202 individuals into each group. The concession calculation below illustrates our estimated overall funding amount should all 1,009 existing Lifeline voice customers participate:

⁵ American FactFinder, 2006-2010 American Community Survey 5-Year Estimates, Gila River Indian Reservation, AZ, http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_10_5YR_DP03 (last visited June 28, 2012).



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GROUPS	PROGRAM CONCESSION	ESTIMATED PARTICIPANTS	MONTHLY CONCESSION AMOUNT
Group 1	\$0	202	\$0
Group 2	\$38.24	202	\$7,724.48
Group 3	\$33.24	202	\$6,714.48
Group 4	\$28.24	202	\$5,704.48
Group 5	\$23.24	201	\$4,671.24

1,009 participants \$24,814.68/month
 x 12 months
 \$297,776.16

Non-recurring Installation Fee Total + \$25,225
PROPOSED OVERALL FUNDING AMOUNT \$323,001.16

8. The pilot program name/slogan will be referred to as **“Breaking Barriers for Broadband Service”** in all marketing and promotional efforts. GRTI will implement a “grass roots” effort to market the broadband offering(s) to low-income consumers by:

- Reaching out to existing Lifeline voice subscribers by invitation to an initial free bar-b-q information meeting in which we will hold a random drawing style exercise to determine which group each subscriber will fall into.
- Telephone numbers will be called, not names, in order to depersonalize how a subscriber gets assigned to one of the 5 groups described above herein.
- Of those subscribers that choose not to participate at the initial information meeting, their decision will be recorded, and why, and GRTI will continue to contact each individual via telephone and mail, every other month, to inquire whether their situation has changed and they would like to participate in the original group they were selected for.
- Once a telephone number has been assigned a group, no changes to another group will be permitted.
- GRTI will place a print advertisement in the local Gila River Indian Newspaper monthly for the 12-month period, which will explain the



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broadband pilot program in detail and the qualifications for participation, including end-user consent requirements.

- GRTI will include an insert in all billing statements to all residential customers explaining the broadband pilot program in detail and the qualifications for participation, including end-user consent requirements.
- GRTI will attend community district meetings monthly to promote the broadband pilot program as needed. The Gila River Indian Community is comprised of seven districts. Each district holds a meeting prior to every Council meeting, which are held bi-monthly. This will allow GRTI a potential attendance at a minimum of 7 district meetings per month.
- GRTI will promote the broadband pilot program at all existing “District Days” events. “District Days” are GRTI sponsored monthly special events where members of our public relations and customer service staff go out into the community and provide new and existing information about our products and services, sign-up new customers for service and accept payment for monthly billing statements. “District Days” are held two separate days in two different areas of the 372,000-acre reservation in advance of disconnect dates of service.
- GRTI will attend reoccurring Elderly Services meetings to promote the broadband pilot program to the low-income elderly residents of the community.
- Any community events where GRTI has the opportunity for booth space and/or speaking engagement in order to get information out.
- GRTI will post flyers on informational boards located in each of the Community’s seven district areas.

The language in which all marketing materials and efforts will be in is English. Although tribal members do speak the O’odtham and Pee Posh language, it is a very low percentage, and of those that can speak it, many do not know how to read it. Our native language is sadly a diminishing resource.



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9. The customer service support that will be available to the participants will follow what we currently have in place for our broadband customers. NeoNova Network Services, Inc. (“NeoNova”) currently provides GRTI broadband customers with Internet Technology support. A designated phone number is assigned for this function. At the initiation of the phone call, NeoNova attempts to assist the user with internet connection issues and troubleshooting via telephone. If the problem has not been resolved at that level, NeoNova escalates the problem to our office where an outside plant on-call technician is assigned to physically go out to the customer for assistance. NeoNova provides a wide array of subscriber, network management, and professional services with extensive industry experience and service delivery software platform. NeoNova’s cloud-based, flexible, and modular provisioning platform enables a comprehensive suite of applications and value-added services that allow for best in the class ISP. (Please reference www.neonova.net for additional information on NeoNova.)

(C) Explanation of how GRTI’s project will address barriers to broadband adoption other than cost, including but not limited to:

1. We plan to provide digital literacy training in-person free of charge to the program participants. The design of the training sessions will be developed and implemented by Anthony Newkirk of GRTI and April Tinhorn of Tinhorn Consulting, both Native Americans. Mr. Newkirk is a community member of the Gila River Indian Community. The intent of the digital literacy training component will be to help those who have not been connected with or exposed access to the value and ease of use, and resources, of the internet. GRTI will reach out to Gila River Indian Community schools and community resources, such as the Computer Center and District Centers, for identifying physical locations where the training will be held. We are confident that some or all of these locations will be secured and adequate for training as most of these locations are schools currently receiving E-Rate funding for digital literacy through the United States’ Bureau of Indian Affairs. We have identified the following locations:

- Blackwater Elementary School
- Sacaton Elementary Public School
- Sacaton computer lab
- St. Peter’s Catholic School
- Casa Blanca Elementary School
- Gila Crossing Elementary School
- Gila River Boys and Girls Club (Sacaton and Komatke locations)



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2. GRTI has designed two separate offerings as described in section I.(B) 4 above. The first incorporates a free computer to the participants in two of the tiered offerings. This will be implemented only if GRTI is able to secure the cost expense through the request of Tribal officials as we do not have the money allocated in our current operating or capital budget. As previously mentioned GRTI is owned and operated by the Gila River Indian Community and receives funding through approved capital and operating budgets for expenditures on a fiscal year. If GRTI is successful in attaining additional funds from the Gila River Indian Community Council for this provision, GRTI will purchase the computers from NTS. NTS is a wholly owned subsidiary of GRTI. NTS is a structured cabling and enterprise solutions provider, specializing in telecommunications systems, video surveillance, access control, and printer/computer sales and service. If GRTI does not receive an approval to bear the burden of this unanticipated expense mid-fiscal year, GRTI will then offer participants of the program an option to pay a monthly fee for a computer purchase and it will become their property if they complete a 12-month computer purchase payment program. The computer purchase will not required under this offering and the customer has sole discretion to purchase or not purchase a computer. Please reference www.native-tech.net for more information about NTS. The description of the computer component that will be offered is a Dell GX280 Tower P4 2.86Hz/1 GB/80HD/17in LCD Monitor/Mouse/Keyboard/Windows XP Professional w/ license and CD. Estimated cost per unit is \$350.

(D) The following individuals and entities we propose partnering with are:

- NeoNova for customer service support. Refer to section I.(B) 9 above for a description of service and qualifications.
- NTS for desktop hardware and technical support. Refer to section I.(C) 2 above for a description of service and qualifications.
- Derek White of NTS (Enrolled member of the Gila River Indian Community) – Please see Attachment A for biography of Mr. White.
- Yvonne Garcia of NTS (Enrolled member of the Gila River Indian Community) – Please see Attachment A for biography of Ms. Garcia.
- Franklin Pablo, Jr. of NTS (Enrolled member of the Gila River Indian Community) – Please see Attachment A for biography of Mr. Pablo, Jr.
- Anthony Newkirk of GRTI for digital literacy, data gathering and evaluation (Enrolled member of the Gila River Indian Community) – Please see Attachment A for biography of Mr. Newkirk.



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- April Tinhorn of Tinhorn Consulting for digital literacy (Enrolled member of the Hualapai Tribe) – Please see Attachment A for biography of Mrs. Tinhorn and www.tinhorn-consulting for more information on Mrs. Tinhorn’s business.
- Letha Lamb, Marketing Consultant with GRTI for design, implementation, data collection and analysis. (Enrolled member of the Gila River Indian Community) – Please see Attachment A for biography of Ms. Lamb.

(E) Design, Data Gathering, and Evaluation

1. The details regarding our design of the project include:

a) The design and instruments we will utilize in our pilot project will be authored by Anthony Newkirk of GRTI. The basic steps to our quantitative approach for our design will include:

- Establish the research question
- Determine the participants
- Establish the variables, measures, and design
- Establish the instruments for data collection and tools for analysis

b) GRTI’s study will offer various broadband price points at different speeds and may be coupled with voice services and with or without computers in an effort to inform the FCC on factors that impact adoptions and retention rates. The casual impact of the variations will become prevalent as the consumer choses to participate based on the price point and whether the offering of a computer entices their potential to participate.

c) GRTI’s methodology for selection into the group offerings will be done by a “lottery” drawing style assignment. GRTI’s intent is to host a selection meeting where invitations will be sent to GRTI’s existing participants of the Lifeline voice program. Each individual phone number will be placed into a bin and we will randomly pull a number out and assign it to an offering group in sequential order. (e.g. First phone number pulled will be assigned to Group 1, second phone number pulled will be assigned to Group 2, third phone number pulled will be assigned to Group 3, etc.) This will assure complete arbitrary selection of what offering is made. At this time, the individual responsible for that phone number will have the option to opt in or out of the program. This will give us an immediate statistic to collect. If the subscriber decides to opt into the program,



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we will obtain the consent requirements as outlined in the public notice announcement. Any new subscribers that qualify and are not in our initial selection of group pooling will be assigned automatically and sequentially as they qualify and opt into the program. GRTI staff will be made aware of what offering group to begin assigning new participants to. The pilot program name/slogan will be referred to as **“Breaking Barriers for Broadband Service”** in all marketing and promotional efforts.

d) Weighting is generally used in survey analysis to compensate for sample designs and patterns of non-response that might bias results. The data will be weighted to correct for three sample elements that could potentially bias survey estimates: 1) the oversampling through screening of additional non-adopters, 2) different probabilities of selection based on the number of adults in each household and 3) disproportionate non-response.

e) GRTI has a demonstrated record of success in utilizing the Enhanced Lifeline program to raise the telephone penetration rate in the Gila River Indian Community. Indeed, telephone penetration rates in the Gila River Indian Community hover above 80% annually, which is significantly higher than the national average telephone penetration rate on tribal lands. Of GRTI's subscribers, generally more than 80% qualify for Enhanced Lifeline. GRTI will employ techniques similar to those it uses in the Enhanced Lifeline context to obtain a high rate of participation in the Broadband Adoption Lifeline Pilot Program. Specifically, of those potential participants that choose not to participate in the pilot program, such potential participants' decisions and reasoning will be recorded, and GRTI will continue to contact each individual via telephone and mail every other month to inquire as to whether their situation has changed and they would like to participate in the original group to which they were assigned.

GRTI's aim in selecting a sample size is to focus more on accuracy rather than the need for a large sample size. Many of the community members that are not currently on the Lifeline program, or are wireless only households, may still qualify as low-income.



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2. GRTI will design, develop and collect the survey instrument data necessary to provide the standardized data described in the FCC's Public Notice Appendix. Zoomerage is an online survey application that may be considered by GRTI for use in our project. In addition, GRTI does not anticipate having USAC collect the data at this time.

3. GRTI does not plan to collect additional data outside of the standardized data; however GRTI does plan to document feedback from participants and report any trends or themes.

(F) GRTI will require all participants in the Broadband Adoption Lifeline Pilot Program to submit documentation required pursuant to 47 C.F.R. §54.410 and complete an enrollment form that will be substantially similar to the voice Lifeline/Link-up enrollment form. See enrollment form in Attachment B.

(G) As part of GRTI's informed consent, participants of the study will be made aware of the project length. As a tribally owned and operated entity, GRTI is obligated to meet the communications needs of the Gila River Indian Community to the best of GRTI's ability. Accordingly, GRTI will engage GRIC's Tribal Council during the pilot program to develop a transitional plan that will minimize harm to the pilot program subscribers at the conclusion of the pilot program. In addition, GRTI encourages the FCC to consider allowing an ETC to use any excess pilot program funds held by such ETC, to the extent such excess funds exist at the conclusion of the project, for purposes of easing the transition at the conclusion of the ETC's project.

(H) GRTI's analysis will include the cost of converting non-adopters to adopters and insight as to how low-income residents of Tribal lands value varying broadband speeds. In addition, GRTI's analysis will help the Commission determine whether low-income residents are more likely to adopt broadband when digital literacy is provided at no cost to the subscriber. Further, GRTI's analysis will help the Commission determine the extent to which broadband adoption is aided by no-cost computer equipment or computer equipment offered through low-monthly payment plans. As a result of the unique nature of Tribal telecommunications, GRTI's analysis will provide valuable insight into how the Commission can raise the broadband adoption rate on Tribal lands.



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II. Attachment C contains the certifications requested by an officer of GRTI under penalty of perjury. Such certifications include:

(A) That GRTI intends to offer broadband service pursuant to the Commission's rules and regulations for Lifeline program;

(B) That GRTI will implement all necessary procedures and efforts to prevent waste, fraud and abuse in connection with its participation in the Pilot Program, including but not limited to procedures to prevent duplicate broadband subsidies within its subscriber base, and procedures to de-enroll subscribers receiving more than one broadband discount per household;

(C) That GRTI's broadband service offering(s) will provide sufficiently low latency to enable use of real-time applications such as Voice over Internet Protocol (VoIP) and if there are usage limits for each plan, that GRTI is reasonably comparable to usage limits for comparable broadband offerings in urban areas; and

(D) That GRTI will participate in the collection and sharing of anonymized qualitative and quantitative data with standardized data elements, formatting, and submission requirements, and that GRTI will participate in workshops to discuss interim and final results of the project, and how best to use limited universal service funds to increase low-income consumers' adoption of broadband services.

Thank you for your favorable consideration. This completes GRTI's application for the Broadband Adoption Lifeline Pilot Program.

A handwritten signature in black ink that reads "Bruce Holdridge".

Bruce Holdridge
General Manager



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ATTACHMENT A

BIOGRAPHIES AND/OR RESUMES FOR SECTION I.(D)

DEREK E. WHITE

Derek E. White is the subsidiary manager for Native Technology Solutions and an enrolled member of the Gila River Indian Community. Mr. White has 30 years experience in telecommunications and data networks with a broad range of experience in the creation and deployment of large networks, operations environments and infrastructures for Tribal government, Internet and the competitive service provider market. Derek has worked in both Tribal Telco and independent/rural Telco industries in several capacities including Board of Director, Network Operations Manager, Central Office Manager, and Data Technician/Installer. Mr. White has also proudly served in the United States Army as a Data Technical Controller/Installer – 32DI. These various roles have allowed Mr. White to be a resource and spokesman for the fundamental cause of attacking the digital divide in Native communities and created fundamental structure for telecommunications companies that provide data networking, IP backbone and value added services, circuit switching and wireless services.

YVONNE GARCIA

Yvonne Garcia is a Network Technician for Native Technology Solutions and an enrolled member of the Gila River Indian Community. Ms. Garcia has an Associates degree in Computer Networking/Information Technology and is currently working to acquire a Bachelor of Science degree in Computer Science. Yvonne has worked in various positions within the Tribal government including Help Desk Technician, Graphics/Web Designer, Desktop Support Analyst, and Computer Technician/Specialist.

FRANKLIN PABLO, JR.

Franklin Pablo, Jr. is a Network Technician for Native Technology Solutions and is an enrolled member of the Gila River Indian Community. Mr. Pablo, Jr. has an Associate of Applied Science degree in Information Technology-Computer Networking Systems and a Bachelors of Science degree in Information Technology-Data Communication Systems Technology. Franklin's employment history includes work as a Computer Technician and Network Administrator.



Gila River Telecommunications, Inc.

*Box 5015
7065 West Allison Road
Chandler, Arizona 85226-5135
Phone (520) 796-3333 • Fax (520) 796-7534
www.gilanet.net*

ANTHONY NEWKIRK

Anthony Newkirk is the owner of Mobile Nations Technology LLC, a mobile web and app development firm. He is an enrolled member of the Akimel O’odtham Tribe of the Gila River Indian Community. Anthony attained his Bachelor of Arts Degree in Information Technology; an MBA focused in Project Management, and is currently enrolled at Capella University to attain a PhD in Information Technology. From 1989 to 2000, he proudly served 10 years in the United States Air Force as an Ammunitions Specialist and now serves on the boards of directors for the Gila River Business Owners Association, Gila River Telecommunications Inc. and a former board member of the American Indian Chamber of Commerce of Arizona, and the Pueblo Grande Museum.

APRIL TINHORN

April Tinhorn is the owner of Tinhorn Consulting LLC, where she offers a variety of services including website design and digital literacy training. Ms. Tinhorn is an enrolled member of the Hualapai Tribe, has a Bachelor of Science degree and Master of Science degree both in Computer Science. April has an impressive employment history ranging from work with the United States National Security Agency as a Web Developer, Router Tester-Network Services, Systems Administrator, and Web Consultant-Corporate Marketing to a Software Engineer for IBM. Ms. Tinhorn has also worked for Indian Health Services as a Web Developer and Information Technology Specialist and for the Seminole Tribe of Florida as the Deputy Executive Director of their Native Learning Center before starting her own independent business.

LETHA LAMB

Letha Lamb is an independent advertising, marketing and public relations consultant working with GRTI. Ms. Lamb is a proud Akimel O’odtham and an enrolled member of the Gila River Indian Community. Letha has over 15 years of experience in advertising, marketing and public relations working for Indian gaming facilities, Indian Tribes and Tribal Organizations and Associations across the United States. She has also served as an ambassador for her Tribes and has testified before the United State’s Senate Select Committee on Indian Affairs regarding issues facing Native youth and the National Gambling Impact Study Commission. Ms. Lamb has served on several Board of Directors including the Gila River Indian Community’s Boys & Girls Clubs, Wild Horse Pass Development Authority, Gila River Gaming Enterprises, and Gila River Telecommunications. She is an active member of Arizona’s Fiesta Bowl Committee and the City of Chandler’s Human Relations Commission.



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ATTACHMENT B



Gila River Telecommunications, Inc.

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GRTI Enhanced Lifeline & Link-Up Application

Enhanced Lifeline Telephone Service/Link-up Assistance is available to all residential customers who live within the boundaries of an Indian reservation. The eligibility established by the FCC is listed below. This is a self-certification application and must be returned to GRTI.

Return to: **Gila River Telecommunications, Inc.** (520) 796-3333 Phone
 Box 5015, 7065 W. Allison Rd. (520) 796-1065 Fax
 Chandler, AZ 85226 www.gilanet.net

Name
Date of Birth Last 4-digits of Social Security Number
Mailing Address Is this address
Billing Address (if different) Permanent Temporary
Telephone Number The telephone account must be in applicant's name.

I am applying for
 (check one or both)

- Enhanced Lifeline monthly telephone service discount of \$18.50
- Link-up telephone installation discount of \$45.00, one-time charge

I participate in
 (only one needed to qualify)

- Bureau of Indian Affairs General Assistance
- Federal Public Housing Assistance (FPHA) or Section 8
- Supplemental Nutrition Assistance Program (Food Stamps or SNAP)
- Head Start (income eligible)
- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- National School Lunch Program's free lunch program
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF) or Tribal TANF
- Food Distribution Program on Indian Reservations
- Income at or below 135% of the Federal Poverty Guidelines

<u>Family Size</u>	<u>Annual Income</u>
1	\$15,080
2	\$20,426
3	\$25,772
4	\$31,118
5	\$36,464

For each additional person in the home add \$5,346 to income eligibility requirements.

Please continue to the second page.

Customer Certifies - Please read and initial all



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Customer Certifies:
 household)

- _____ Phone service is listed in his or her name. (One discount per household)
- _____ The subscriber meets the income-based or program-based criteria for receiving Lifeline.
- _____ The subscriber will notify the carrier (G.R.T.I.) within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit.
- _____ If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands.
- _____ If the subscriber moves to a new address, he or she will provide that address to G.R.T.I. within 30 days.
- _____ If the subscriber provided a temporary residential address to G.R.T.I. he or she will be required to verify his or her temporary residential address every 90 days.
- _____ The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service.
- _____ The information contained in the subscriber's certification is true and correct to the best of his or her knowledge.
- _____ The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- _____ The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits.

Applicant Signature	Date

For Internal Use Only

____ Original Certification
 Age Verified Y / N
 Documents Scanned Y / N

____ Re-Certification
 Service Order No.
 CRM Notes Y / N



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ATTACHMENT C



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June 29, 2012

Federal Communications Commission
Commission Secretary
445 12th Street, S.W. Room TW-A325
Washington, D.C. 20554

Please accept the following certifications as an addition to our Broadband Adoption Lifeline Pilot Program application:

- a. Gila River Telecommunications, Inc. intends to offer broadband service pursuant to the Commission's rules and regulations for the Lifeline program;
- b. Gila River Telecommunications, Inc. will implement all necessary procedures and efforts to prevent waste, fraud and abuse in connection with its participation in the Pilot Program, including but not limited to procedures that GRTI will have in place to prevent duplicate broadband subsidies within its subscriber base, and procedures to de-enroll subscribers receiving more than one broadband discount per household;
- c. Gila River Telecommunications, Inc. broadband service offering(s) will provide sufficiently low latency to enable use of real-time applications such as Voice over Internet Protocol (VoIP) and if there are usage limits for each plan, that they are reasonably comparable to usage limits for comparable broadband offerings in urban areas; and
- d. Gila River Telecommunications, Inc. will participate in the collection and sharing of anonymized qualitative and quantitative data with standardized data elements, formatting, and submission requirements, and that the ETC will participate in workshops to discuss interim and final results of the project, and how best to use limited universal service funds to increase low-income consumers' adoption of broadband services.

I, Bruce Holdridge, an officer of Gila River Telecommunications, Inc. certify under penalty of perjury that the statements above are accurate.

Bruce Holdridge
General Manager