

Akin Gump

STRAUSS HAUER & FELD LLP

GREG W GUICE

+1 202.887.4565/fax: +1 202.887.4288
gguice@akingump.com

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

Re: WC Docket No. 12-23, 11-42 and 10-90

Dear Ms. Dortch:

On November 21, 2013, I met with Daniel Alvarez, Chairman Wheeler's Wireline Legal Adviser, on behalf of Gila River Telecommunications, Inc. (GRTI). In the meeting, we discussed the importance of the tribal Lifeline and Link-Up program to the Gila River Indian Community. I informed Mr. Alvarez that approximately 80 percent of GRTI's residential subscribers rely on the tribal Lifeline and Link-Up programs for access to telecommunications services.

I also updated Mr. Alvarez on GRTI's participation in the Broadband Adoption Lifeline Pilot Program. GRTI's pilot program tests the effects of the cost of broadband service and equipment (e.g. computers) and broadband speed offerings on broadband adoption in a low-income, tribal community. As explained in the meeting, preliminary results indicate that cost of service and equipment are key factors in determining whether a low-income tribal resident adopts broadband service. In particular, broadband adoption is more likely when low-income tribal subscribers are offered significant discounts on both broadband service and equipment.

We also discussed GRTI's position in the Commission's proceeding to represcribe the rate of return for rate-of-return carriers. Tribally-owned carriers face more risks than non-tribally-owned carriers and are more limited in their ability to access credit and capital. Consequently, GRTI recommended that the Commission adopt a separate rate of return for tribally-owned carriers that, at a minimum, maintains the current 11.25% rate of return.

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This disclosure is made in compliance with 47 C.F.R. §1.1206

Best regards,

/s/ Gregory W. Guice
Gregory W. Guice

Counsel to Gila River Telecommunications, Inc.