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November 22, 2013

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

Re: WC Docket Nos. 12-23, 11-42 and 10-90

Dear Ms. Dortch:

On November 20, 2013, Derek White, General Manager for Gila River Telecommunications, Inc. (GRTI), Sean Conway, an attorney at Akin Gump Strauss Hauer & Feld LLP, and I met with Rebekah Goodheart, Commissioner Mignon Clyburn's Wireline Legal Advisor, to discuss the importance of the tribal Lifeline and Link-Up program to the Gila River Indian Community. GRTI informed Ms. Goodheart that approximately 80 percent of GRTI's residential subscribers rely on the tribal Lifeline and Link-Up programs for access to telecommunications services.

GRTI also updated Ms. Goodheart on its 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.

GRTI discussed its position in the Commission's proceeding to represcribe the rate of return for rate-of-return carriers. GRTI explained that 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, Gila River Telecommunications, Inc.*