

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Navajo Pillars Telecommunications, Inc.)	
)	
Petition for Waiver of the Definition of “Study Area” Contained in Part 36, Appendix- Glossary of the Commission’s Rules)	CC Docket No. 96-45
)	
Petition for Designation as an Eligible Telecommunications carrier Pursuant to Section 214(e)(6) of the Communications Act, as Amended)	WC Docket No. 09-197
)	
Related Waivers of Parts 36, 51, 54 and 69 of the Commission’s Rules)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing a Unified Intercarrier Compensation Plan)	CC Docket No. 01-92
)	

**COMMENTS IN SUPPORT OF
NAVAHO PILLARS COMMUNICATIONS, INC. PETITION**

WTA – Advocates for Rural Broadband (“WTA”) submits comments in support of the September 13, 2013 petition of Navajo Pillars Telecommunications, Inc. (“Navajo Pillars”) for designation as an Eligible Telecommunications Carrier (“ETC”) and for various waivers of Parts 36, 51, 54 and 69 of the Commission’s Rules.

Whereas WTA understands that the formal pleading cycle for comments and reply comments with respect to the Navajo Pillars petition ended December 16, 2013 (See *Public Notice*, DA 13-

2100, released October 30, 2013), WTA only recently became aware of the Navajo Pillars situation and circumstances, and wishes to offer its support. If the Commission wants WTA to file a formal motion for acceptance of late-filed comments, WTA will do so.

WTA is a national trade association that represents more than 250 small rural telecommunications carriers that provide voice, video and data services to some of the most rural and hard-to-serve communities in the country and that are the providers of last resort to those communities.

WTA believes that the proposed new Navajo Pillars network not only is the type of project that warrants Universal Service Fund (“USF”) support, but also one that entails special circumstances that justify waiver of the normal USF rules and waiting periods. The two proposed Navajo Pillars exchanges consist of unserved areas on Navajo Nation tribal lands. They are located in a valley that is over a mile above sea level, and that is surrounded by even higher mesas that significantly restrict the availability of satellite and microwave backhaul. The 239-square mile area is very rural, and has a sparse and scattered population of only 2,282 residents. The proposed service area has only one store, and is located over 35 miles from the closest town of significant size: Chinle, Arizona (2010 population: 4,518).

The proposed Navajo Pillars service area has no wireline telecommunications service, a condition that has long crippled the business, employment and educational opportunities of its residents; precluded access to emergency police, fire and ambulance services; and severely limited the availability and quality of regular medical services as well.

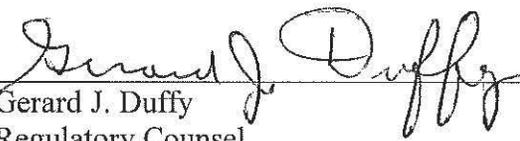
Navajo Pillars is owned by a member of the Navajo Nation, who understands the ways of life and service needs of fellow tribal members. Unfortunately, the one thing that Navajo Pillars does not have is unlimited funds to build and operate its proposed network. It is seeking a substantial loan from the Rural Utilities Service (“RUS”), but needs to demonstrate to RUS that it will have sufficient

and predictable revenue streams at an early date so that it can repay the RUS loan. Given the remote and rural nature of its proposed service area and the current economic status of area residents, Navajo Pillars needs sufficient federal high-cost support right away (without the normal regulatory and accounting lags) if it is to qualify for and obtain the necessary RUS loan.

Put simply, without the requested waivers, Navajo Pillars will not obtain the requisite RUS loan, and will not be able to proceed with the construction of its proposed network. This would be a tragedy for the long unserved residents of the Smoke Signal Chapter House and Blue Gap Chapter House regions of the Navajo Nation. If Navajo Pillars cannot implement its plans, it is not clear when, if ever, the tribal members residing in these areas will ever receive adequate (much less, quality, affordable and reasonably comparable) telecommunications and information services.

WTA urges the Commission to consider the unique and compelling circumstances presented by Navajo Pillars, and to grant its requested waivers fully and expeditiously.

Respectfully submitted,
WTA – ADVOCATES FOR RURAL BROADBAND

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