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March 13, 2014

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 March 12, 2014, Anthony Newkirk, Chairman of the Board and John Lewis, Board Member for Gila River Telecommunications, Inc. (GRTI), Robert Stone, Councilman for Gila River Indian Community, and I met with Daniel Alvarez, Chairman Wheeler's Wireline Legal Advisor, to discuss the importance of the tribal Lifeline program to the Gila River Indian Community. GRTI informed Mr. Alvarez that approximately 70-80 percent of GRTI's residential subscribers rely on the tribal Lifeline program for access to telecommunications services.

GRTI also updated Mr. Alvarez 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.

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

Best regards,

Ms. Marlene Dortch, Secretary
March 13, 2014
Page 2

/s/ Gregory W. Guice
Gregory W. Guice

Counsel, Gila River Telecommunications, Inc.