CONFEDERATED TRIBES
of the
GOSHUTE RESERVATION
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March 13, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

Dear Ms. Dortch,

Please accept this Expression of Interest from the Confederated Tribes of Goshute Reservation (CTGR) to participate in the FCC's Rural Broadband Experiment.

Background

The CTGR is a federally recognized American Indian Reservation located approximately 70 miles south east of Wendover, Utah via U.S. Highway 93A. CTGR has about 590 enrolled members, with about 120 living in Ibapah. CTGR covers approximately 112,870 acres in a rural and remote area of Juab and Tooele counties in Utah, as well as White Pine County, Nevada. One of the physical barriers for access to Ibapah is the Deep Creek Mountains, which run along the Eastern side of CTGR's reservation. Provisioning Broadband services to the CTGR is a challenge because of the remoteness and sparse population density.

The CTGR's goal is to establish a tribal entity that will pursue a partnership with a service provider to build-out middle mile and last mile FTTH facilities to every household and CAI. The ultimate goal of the Tribe is to offer broadband services to those that live and work within our tribal land area and strengthen the infrastructure of the entire community in Ibapah, which includes non-member Indians, and non-Indians.

Geographic Territory

The Confederate Tribe of the Goshute Indian Reservation is located within three (3) three Census Tracts. Two of the three Census Tracts are eligible for support and are listed below, and identified on the attached map titled, "Proposed Geographic Territory," submitted as part of this Expression of Interest.

It is important to note that the Goshute Tribal Headquarters along with a number of households and CAI's are located in the Census tract that is not eligible. We respectfully request that the FCC consider eligibility support in the Rural Broadband Experiment for Census Tract 49045130600 for the portion of the Census Tract that encompasses the CTGR tribal lands.

The number of households and the population within the proposed "Experiment" area is listed below. Additionally, they are identified on the attached map titled, "Household & Population Data," submitted as part of this Expression of Interest.

Eligible Census Tract	State	County	Proposed Experiment Area	Household/ Density	Pop./Density
49023010200	Utah	Juab	CTGR	63/0.36 per sq. mi.	143/0.81 per sq. mi.
32033970100	Nevada	Tooele			

List of Community Anchor Institutions

The Anchor Institutions to be served by the proposed "Experiment" are the following:

1. Goshute Tribal Court
2. Confederated Tribes of the Goshute Reservation Government Center
3. Goshute Tribal Social Services
4. Goshute Tribal Community Center
5. Goshute Housing Authority
6. Ibapah Elementary School
7. Indian Child Welfare Program
8. Goshute Medical Clinic
9. Goshute Tribal Law Enforcement
10. Goshute Tribal Utility Department
11. Goshute Tribal Environmental Protection Program
12. Goshute Tribal Education Program
13. Native American Church
14. Early Child Development Center
15. Goshute Tribal Roads Department

Proposed Technology

Fiber optic cable as the physical infrastructure and Active Ethernet (AE) as the last-mile technology is the only feasible solution to address broadband access to those that reside within the CTGR area. The existing conditions of the copper loops and the location of the Digital Subscriber Line Access Multiplexer (DSLAM) currently serving the CTGR prohibits all subscribers from access to broadband services.

Based on the number of projected "homes passed" located within the CTGR service area, the proposed design of the Optical Distribution Network (ODN) is a "Home Run" architecture that will provide a dedicated fiber to each subscriber. The proposed ODN will consist of 25 miles of

backbone fiber and 3.5 miles of distribution fiber. The backbone fiber will be direct buried utilizing armor cable, and the distribution cable will be placed in an underground duct system.

The proposed Broadband Access System (BAS) will provide Active Ethernet (AE) fiber access technology. The BAS will provide each subscriber a dedicated capacity of 1Gbps to support high-speed Internet with future support for Triple-Play (voice, video, & data) services to approximately 63 household units and 11 Community Anchor Institutions within the CTGR.

High-speed Internet service will range from 10 Mbps to 100 Mbps for residential subscribers, and up to 1Gbps for business and CAI subscribers. The VoIP solution, when implemented, will adhere to Universal Service regulations that are required for ETC compliance and designation.

State and/or Local or Tribal Government Participation in and/or Support of Project

In 2011, the CTGR was awarded a grant from USDA's BIP Technical Assistance Program to create regional broadband development plans and to support planning efforts to lay the groundwork for the future development of broadband infrastructure and increased broadband access in their proposed service area.

The State of Utah Governor's Office of Economic Development acknowledges the lack of Broadband services that impact the CTGR. In the 'State of Utah Broadband Project,' August 2013, Juab County was identified as one of Utah's five most unserved Counties.

The Confederated Tribes of the Goshute Reservation respectfully submit that the FCC interpret and apply its governing statutes and regulations to this filing in a "manner that comports with tribal sovereignty and the federal policy of empowering tribal independence" as outlined in the Twelfth Report & Order. [1]

Existing Providers

Beehive Telephone Company is the existing Rate of Return Carrier wireline service provider that serves the Confederated Tribes of Goshute Reservation. We note that Beehive Telephone Company has submitted two separate Expressions of Interest for areas that include the CTGR tribal lands in both Utah and Nevada. Beehive Telephone Company proposes to expand FTTH to all of its customers with the initial priority to the CTGR.

The CTGR is not aware of Beehive Telephone Company's plans and requests that the FCC consider a tribal centric solution to deploying FTTH facilities to provide broadband services to CAI's and residents within CTGR tribal lands.

Project Timeline

If the Next Generation Network Experiment (NGNE) funding becomes available in 2015 or sooner, the project implementation will be initiated. If funded through NGNE, it is projected that the implementation of the NG communication services will be completed and participation of the

[1] Twelfth Report and Order, FCC Rcd 12208 at Para. 119

FCC experiment will begin within 12 months of funding.

Scalability

The Optical Distribution Network will be sized and designed for future expansion of the FTTH network. The Broadband Access System to be selected will have the capacity to support the network expansion by adding additional cards.

Total Utility Investment

The total utility investment is estimated to be $1,277,000.

One Time Capital Infrastructure Investment Needed

The one time capital investment is estimated to be $1,277,000.

Total Project Cost

A Feasibility Study will be done to determine annual ongoing operational costs, which will be completed in 2nd Quarter 2014.

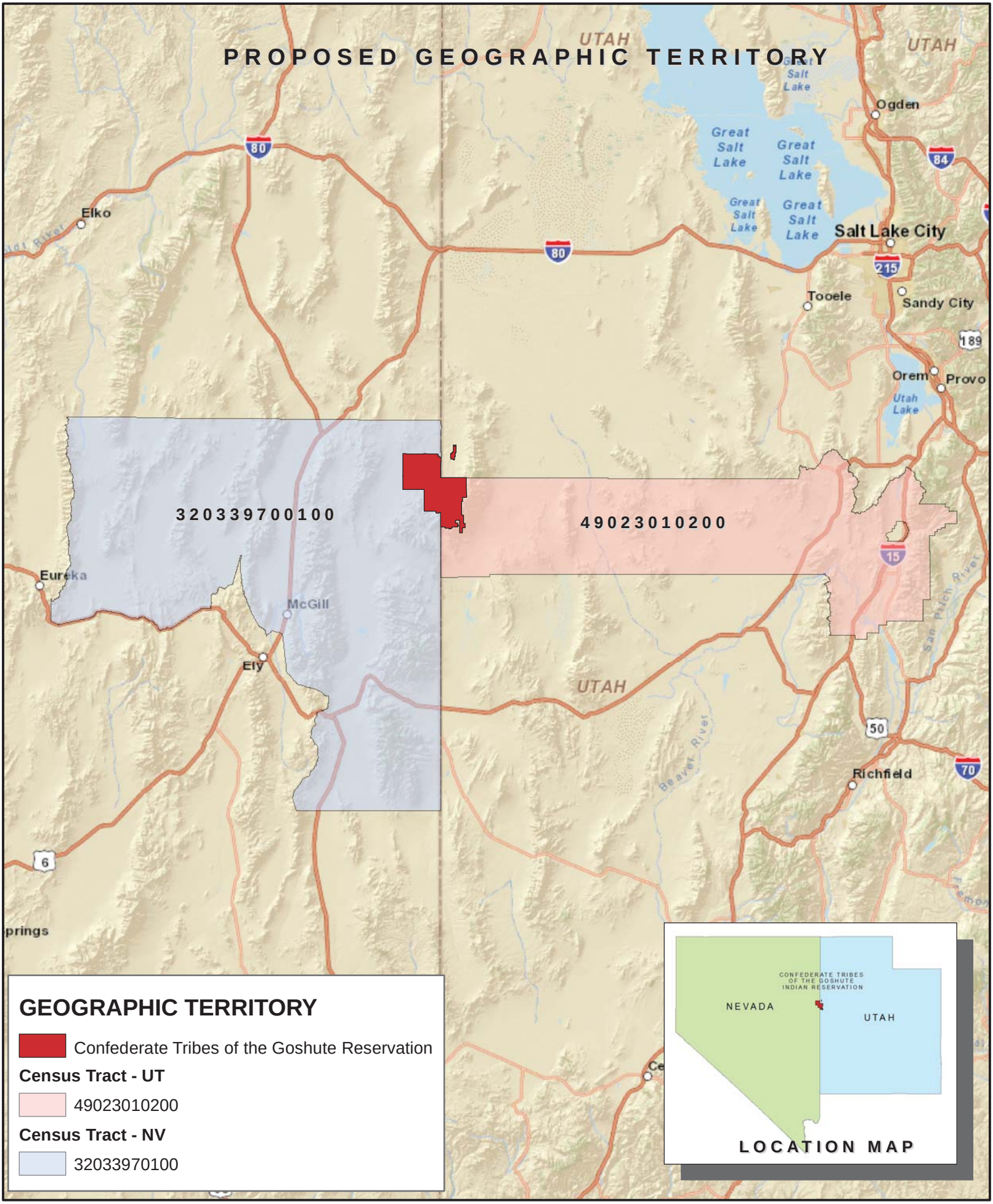
In conclusion, we look forward to the implementation of the FCC's Rural Broadband Experiment Program.

Sincerely,

Madeline Greymountain

Madeline Greymountain
Chairperson

PROPOSED GEOGRAPHIC TERRITORY



N W E S

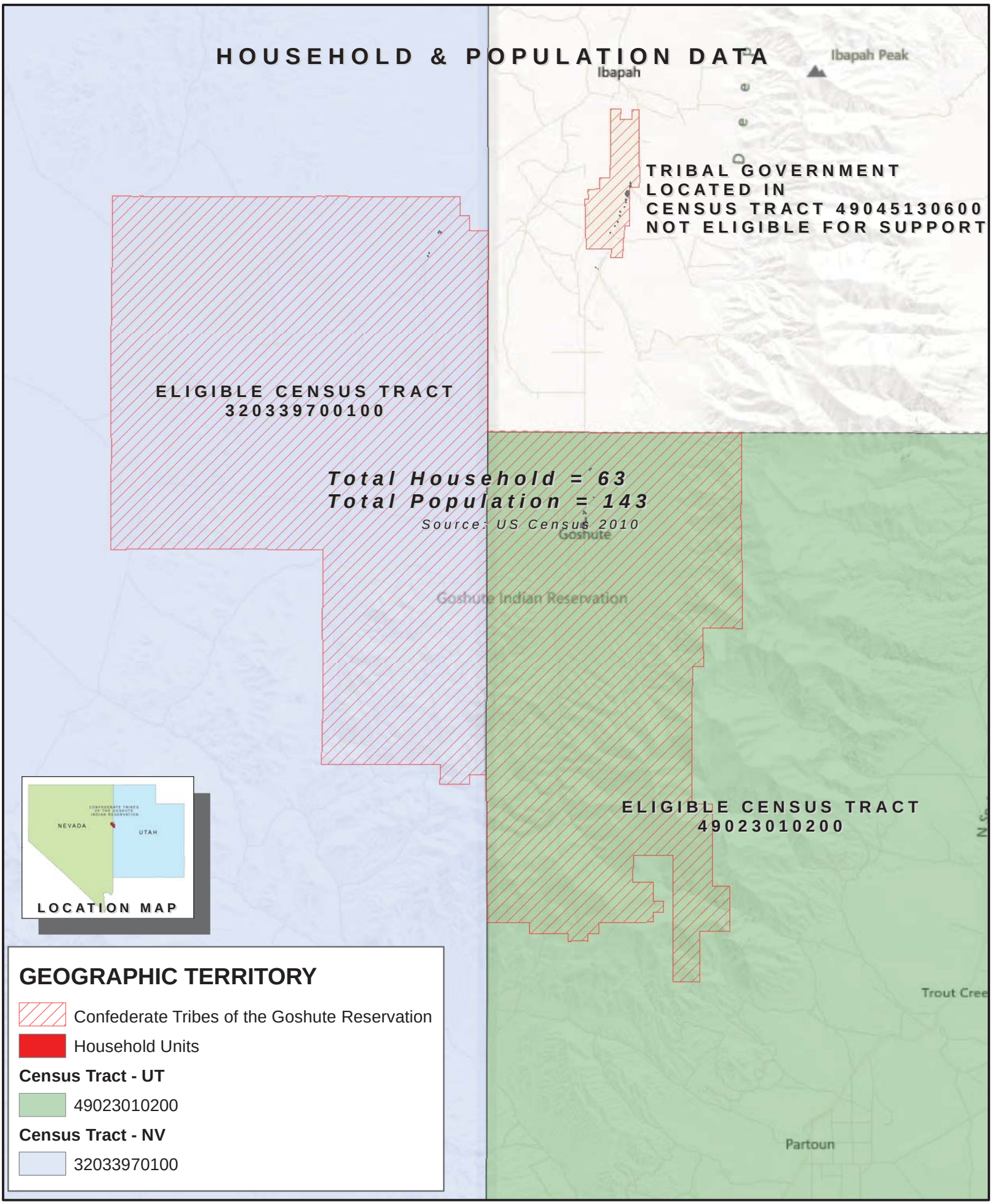
0 12.5 25 50 75 100 Miles

GOSHUTE TRIBE
195 Tribal Center Road
Ibapah, Utah 84034

Prepared By: MLY-TICOM, Inc.
Date: March 12, 2014

Drawing No: GT-1

HOUSEHOLD & POPULATION DATA



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