Dear Ms. Dortch:

By this letter, and pursuant to Sections 1.1206 of the Commission’s rules, the undersigned representing Gila River Telecommunications, Inc. (“GRTI”) and Patrick Halley, Counsel for the National Tribal Telecommunications Association (“NTTA”) met with Rebekah Goodheart, Wireline Legal Adviser to Commissioner Clyburn on November 5, 2015.

During the meeting, we discussed the substantial broadband infrastructure gap on Tribal lands and the need for a targeted effort by the Commission to address this gap as it considers reforming high-cost universal service program rules applicable to rate-of-return carriers. We requested that the Commission adopt a proposal submitted by NTTA on June 19, 2015 to develop a Tribal Broadband Factor (“TBF”), a simple approach to targeting additional support to Tribal lands for infrastructure investment, and expressed a willingness to further discuss the details of the proposal to ensure its inclusion in any broader rule changes the Commission may adopt.

We reiterated that the Commission and others have noted a persistent deficit of achievement in bringing broadband to tribal lands and that the rate-of-return reform effort that is underway at the Commission offers a unique opportunity to address that deficit. NTTA and GRTI reiterated that they would welcome a dialogue with the Commission on the details of a TBF and how to implement such a proposal within the contours of the broader rate-of-return reform effort.

1 47 C.F.R. § 1.1206.
2 Letter from Godfrey Enjady, President National Tribal Telecommunications Association, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (filed June 19, 2015).
3 Broadband Opportunity Council, Report and Recommendations Pursuant to the Presidential Memorandum on Expanding Broadband Deployment and Adoption by Addressing Regulatory Barriers and Encouraging Investment and Training at ¶¶ 6, 16 (2015) (stating “[s]ome parts of the country, mostly rural and Tribal lands, are connectivity deserts – regions with little or no access to broadband – or ‘parched’ with broadband coverage inadequate to meet community needs” and that “[w]hile many communities around the country would benefit from Federal support in addressing connectivity issues, Tribal areas face particular challenges…creating yet another barrier for education, healthcare and economic development.”).
Please direct any questions to the undersigned.

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