



March 17, 2016

Filed Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On Tuesday, March 15, 2016, Brad Veis and Phil Maxwell of 3 Rivers Communications (“3 Rivers”) in Montana; Mark Feest of CC Communications (“CC”) in Nevada; and Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Amy Bender, Legal Advisor, Wireline to Commissioner Michael O’Rielly, to discuss the National Tribal Telecommunications Association’s (“NTTA’s”) proposed Tribal Broadband Factor.

WTA indicated that it supports adoption of a Tribal Broadband Factor in connection with ongoing efforts to revise federal high-cost support for rate-of-return carriers. WTA recognizes that broadband access and adoption are lower on tribal lands, and that the costs of serving tribal lands are often higher than for other rural areas. WTA emphasized that carriers in addition to tribal telephone authorities – carriers such as 3 Rivers Communications and CC Communications – also serve tribal lands and are interested in participating in a Tribal Broadband Factor mechanism.

3 Rivers is a Montana cooperative that serves approximately 20,000 access lines in a rugged and sparsely populated area running from Glacier Park to Yellowstone Park. Its largest exchange in and around Browning, Montana serves the Blackfoot Reservation. 3 Rivers has good relations with the Blackfoot Tribe, and has many tribal members as its cooperative owner-members. Whereas 3 Rivers provides fiber-to-the-premises (“FTTP”) facilities to anchor institutions, business and some residences on the Reservation, the more outlying portions of the Reservation have difficulty competing for limited build-out resources because they have both high construction costs and low broadband adoption rates. 3 Rivers believes that access to the proposed Tribal Broadband Factor would have a substantial positive impact in helping it to direct more fiber resources to the more remote portions of the Blackfoot Reservation.

CC serves portions of rural Nevada in and around Fallon, Nevada, about 60 miles east of Reno, including the Paiute-Shoshone Reservation. Whereas the tribe has constructed a business center on the outskirts of Fallon, its residential area is located about 10-to-15 miles outside of town. CC would like to replace the copper plant presently serving the residential area with fiber-to-the-home (“FTTH”), but has not yet been able to do so. The FTTH build would be particularly important for the school children living on the Reservation, because they currently cannot obtain Internet access at home comparable to what they receive at school. CC indicated that access to an appropriate Tribal Broadband Factor would make it much more feasible for it to extend FTTH to the residential portion of the Reservation.

WTA understands that a Tribal Broadband Factor is likely to be proposed in a further notice of proposed rulemaking, and urges that it be acted upon as soon as practicable. WTA will be interested in reviewing the specific proposal, as well as the manner in which it is targeted, its projected cost, and its impact upon the current rate-of-return support budget.

WTA indicated that it supports a temporary waiver of capital expenditure and operating expense limitations on carriers serving tribal lands while the Tribal Broadband Factor is under consideration in the further rulemaking.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceeding.

Respectfully submitted,

/s/ Gerard J. Duffy

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