



Advocates for Rural Broadband

Paul Kelly
President

Kelly Worthington
Executive Vice President

March 11, 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 Thursday, March 10, 2016, Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Rebekah Goodheart, Legal Advisor-Wireline to Commissioner Mignon Clyburn, 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 understands that a Tribal Broadband Factor is likely to be proposed in a further notice of proposed rulemaking. 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

Gerard J. Duffy
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