



KAWERAK, INC.

REPRESENTING

- Brevig Mission**
- Sitaisaq*
- Council**
- Diomede**
- Inaliq*
- Elim**
- Niviarcaurluq*
- Gambell**
- Sivuqaq*
- Golovin**
- Chinik*
- King Island**
- Ugiuvak*
- Koyuk**
- Kuuyuk*
- Mary's Igloo**
- Qawiaraq*
- Nome Eskimo**
- Sitnasuak Inuit*
- Savoonga**
- Sivunqaq*
- Shaktoolik**
- Saktuliq*
- Shishmaref**
- Qikiqtaq*
- Solomon**
- Anuutaq*
- St. Michael**
- Taciq*
- Stebbins**
- Tapraq*
- Teller**
- Tala*
- Unalakleet**
- Unalaqtiq*
- Wales**
- Kinjigin*
- White Mountain**
- Igatuk /*
- Nutchirviq*

February 11, 2021

To: US Dept. of Commerce, National Telecommunication and Information Administration
Re: Tribal Consultation Comments in regard to NTIA Tribal Broadband Connectivity funding

Introduction -

Kawerak, Inc. is the regional non-profit tribal consortia serving 20 Alaska Native tribes in the Bering Strait Region of Northwestern Alaska. Kawerak, Inc. was formed by the 20 tribes to provide non-profit services to benefit their tribal membership. Kawerak is governed by a 23 member Board of Directors, with the tribal leaders of each tribe serving on the board, along with two elders, and the Chairman of our I.H.S. funded health corporation. 19 of the 20 tribes, in an exercise of self-government, authorized Kawerak by tribal resolution to enter into a PL-638 self-governance compact agreement with the BIA. Our region is the size of West Virginia, with 16 rural communities, not connected by roads, with a population of over 9,000. The Covid-19 pandemic has made all types of service delivery very difficult due to telecommunication challenges.

Eligibility -

1. The haste in the rollout of NTIA broadband funding is challenging, as our tribes are not even fully aware of the status of our 2.5 GHz FCC licenses and if each tribe must apply individually, we would lose the benefits of pooling resources and the maximization of efficiencies that are realized by our tribes being able to apply as a group via the tribal consortium. We recommend that tribal consortia such as Kawerak be eligible for the funding.
2. We advocate for allowing a wide variety of projects rather than a narrow variety, for example allow planning grants, and preconstruction activities and buildout of intranet networks to allow local communities to connect to schools during the Covid-19 pandemic.
3. Please consider allowing longer project periods to help Alaska tribes who face more logistical challenges with construction projects. Our barging and construction season in NW Alaska is limited to three months in the summer due to the ice coverage in the Bering Sea.
4. Please consider allowing parts of projects to occur on non-tribal lands as many tribes have disconnected plots of land and infrastructure to connect them may have to utilize non-tribal lands. The majority of lands in our region are owned by the federal government, the State of Alaska, or ANCSA corporations. Only a handful of tribes in Alaska actually own land and we should not be deemed ineligible based on lack of land ownership. Rights of ways can be secured and that should be allowable.

KAWERAK, INC.

PO Box 948 • Nome Alaska 99762 • 907.443.5231 • www.kawerak.org

Advancing the capacity of our people and tribes for the benefit of the region.

5. Most funding sources for broadband development are federal. We recommend widening the matching eligibility requirements and loosening the duplication of funding so that it's easier to leverage funds and use two or more funding sources to complete various phases of a project. Ideally, the matching requirement should be removed entirely, as the majority of tribal members live in poverty and there are limited economic development opportunities for tribes, especially since Alaska tribes are not allowed to operate or own casinos.
6. The only entities eligible to apply for tribes should be those who tribes expressly authorize to apply on their behalf via tribal resolution.

Equitable Distribution -

1. Alaska's technology development has been delayed compared to the Lower 48 and a large number of tribes all over the country are competing for buildout funding. *It is important to recognize that 1/3 of federally recognized tribes are in Alaska and these are the high need communities.* Also Alaska faces expensive and unique logistical challenges compared to other American Indian tribes, due to short construction season, harsh weather, no road system in much of rural Alaska, high shipping costs, land ownership issues, climate change impacts, and other environmental concerns. *Construction costs in Alaska are often 5 to 6 times that of similar projects in the lower 48.*

Regulations -

1. Tribes need technical support to navigate environmental and NHPA, Cultural Resources and other regulations.
2. The time needed to do environmental assessments eats of the short construction season, and these assessments cannot be done in the winter months in the arctic. Flexibility in timelines is needed.

Unserved Areas -

1. Broadband maps are not accurate, allow tribes to self-certify that they are unserved.
2. Technically some of our tribes are served but only at an exorbitant cost by existing providers; the majority of tribal member households are unconnected due to the unaffordable cost.
3. The base measurement of 25 mbs/second download and 3 mbs /sec is adequate to define unserved, but realize in Alaska, our existing broadband providers use a combination of fiber, microwave, and satellite connectivity so speeds are not consistent, and can be impacted by bad weather and other factors.
4. A local intranet can be built using fixed wireless. This will allow for all in range of the cellular signal to communicate with each other, including schools and clinics. Local intranets can allow for distance learning, telemedicine, and public safety for connected communities. While fiber or microwave might be possible in a few years with federal subsidies, we will need satellite backhaul now to connect local intranet networks to the world wide web now. Even though the connection to the greater Internet will be slower than the definition of broadband, the local intranet networks will be lightning-fast to schools, clinics, government resources, and between connected community members.

Reporting Requirements –

1. The granting agency should provide online trainings rather than in-person trainings or post award trainings during the Covid-19 pandemic.
2. The granting agency needs to take Covid-19 challenges into consideration when setting up deadlines and methods of submission of reporting requirements.

Additional Feedback -

1. Some Alaska Native households cannot access broadband services because they have no bank accounts or debit cards. Our rural communities have no banks and existing internet providers have no local office to be paid in cash. Cash cannot be mailed.
2. Small tribes do not have adequate customer base to support the high cost of middle mile connectivity.
3. Our tribal priority is to have reliable communication for emergencies, for first responders, keeping our Alaska Native hunters safe in remote hunting locations and while hunting in boats far from our shores where they must go to seek traditional food sources. *Connectivity to these remote areas should be part of the broadband builds.* Also Covid-19 and all the travel restrictions make internet communication vital for tele-medicine, education, job training and economic development.
4. Our Alaska Native tribes face horrendous challenges in delivering multiple services to our people. Services taken for granted in other locations are limited here, like mail service, access to power, water and sewer, and technology. In order to develop workable broadband solutions quickly to respond to the unique challenges of serving our people in a pandemic situation, we need access information and technical assistance to develop complex broadband projects.
5. The lack of connectivity is often due to a shared problem: a lack of terrestrial backhaul or sufficient satellite. Allow for regional applications approved by multiple Tribes through tribal resolution to build out fiber and microwave backhaul and assign funds for paying the exorbitant cost of sufficient satellite backhaul in the meantime.

Thank you for considering these recommendations. If you have any questions, please contact Pearl Mikulski, Planner at Kawerak at pmikulski@kawerak.org or 907-443-5231.

Sincerely,



Melanie Bahnke, President
Kawerak, Inc.