February 12, 2021

United States Department of Commerce
National Telecommunications and Information Administration
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Re: Request for Tribal Input on Tribal Broadband Connectivity Grant Program

Dear National Telecommunications and Information Administration,

The Lone Pine Paiute-Shoshone Tribe would like to thank the National
Telecommunications and Information Administration for the opportunity to provide
comments on the development of the Tribal Broadband Connectivity Grant Program. We
attended the Tribal Consultations for the Program that took place on February 10 and
12th 2021. Below are our comments we respectfully ask you to consider.

The Lone Pine Paiute-Shoshone Tribe

The Lone Pine Paiute-Shoshone Reservation is located at an elevation of 3,697 feet above
sea level in the southern portion of the Owens Valley between the Sierra Nevada
Mountains and Inyo Mountain Ranges, approximately 200 miles north of Los Angeles
and 60 miles south of Bishop. Climatic conditions are typical of Southern California
semi-arid high desert regions with hot, dry summers and moderately cold winters. Annual
precipitation averages less than 5 inches and occurs primarily as rain during the winter
months. Occasional light snowfalls can occur.

The Lone Pine Paiute-Shoshone Reservation has a Tribal population of approximately
350 residents and consists of 237.4 acres of land near the community of Lone Pine,
California.

With shelter in place orders due to the pandemic and wildfires, our people have been
stranded in their homes, unable to participate in school, go to their jobs or receive
services. Broadband internet is a basic utility now and necessary as telemedicine,
telecommuting and distance learning become the norm.

Our government needs broadband for communications, especially during the pandemic.
We want access for citizens to participate in meetings virtually and access and equipment
for governments to communicate and work remotely and securely. This will allow for
Tribal Council meetings, remote Tribal court and Tribal government participation with
outside entities on a national level. Sadly COVID related deaths will continue on into the
foreseeable future. This has impacted how funeral services are handled. Funding for

Tribes to address deaths in the community via "virtual memorials" so that family members can attend services remotely.

Eligibility for Tribal Broadband Connectivity Program

The Tribe generally agrees with the entities eligible for the Program, however, an entity should not be excluded from Program funding if they have received funding for broadband – whether at the state or federal level – from another source. Bringing broadband connectivity to tribes will be an incredibly expensive endeavor and tribes should be able to seek funding from multiple sources and not lose eligibility for this Program.

Our tribal governments should be the only one with the authority to designate who can apply for funds on our behalf.

A wide variety of projects that lead to sustainable connectivity for our people should be covered by this funding. This should include but not be limited to planning grants, preconstruction activities, adoption programs, incentives and funding for traditional inter-tribal commerce and consortia building and for leveraging existing relationships with government entities like the Forest Service, Bureau of Land Management and National Parks.

We hope to use these funds for the establishment and expansion of IT capacity, training at the community and government levels and advocate for NTIA to provide incentives for Tribes that provide jobs and training that leverage their communications networks.

Equitable Distribution

The Tribe agrees with the entities eligible for the Program, and also that those entities should not be excluded from Program funding if they have received funding for broadband – whether at the state or federal level – from another source.

The Tribe takes the position that grant funds should be distributed noncompetitively such that all Tribes receive significant support. Distribution based on enrolled Tribal members often means that the small, remote communities most in need get the least amount of support. We advocate for every federally-recognized Tribes and Alaska Native Villages get at least $500k with more monies being awarded based on need.

Historic Preservation and Environmental Assessment

The Tribe advocates for these funds to be used for the protection of cultural and environmental resources. Broadband communications will allow the Tribe to surveil and protect our sacred sites and to monitor the health of the area by measuring air and water quality.

Unserved Areas

Technically some of our tribes are served but only at an exorbitant cost by existing providers. While there are internet services available, they are often too slow or too expensive to be within reach of our Tribal members. The definition of served or underserved should not depend on unreliable Form 477 data, but rather be self-reported by the Tribe with justification of why supposedly available broadband is not accessible.

Reporting Requirements

The Tribe agrees that any reporting requirements developed by the NTIA not be overly burdensome particularly since tribes and tribal resources are stretched thin dealing with the COVID-19 pandemic.

NTIA should provide online training on reporting along with direct assistance as needed.

Additional Comments

The Tribe commends NTIA for making these funds available for infrastructure such as towers, fiber and other network equipment. Training for Tribal members is key for sustainability. We need network/IT managers, fiber splicers, tower climbers, software programmers, etc and desire to build that workforce internally.

Funded networks should have incentives for enhancing emergency services communications during crises such as wildfires and earthquakes.

Funding should dovetail with pandemic response projects and also be able to be leveraged with other federal funds.

This funding should not require a matching component so that all Tribes can make quick use of them without the added strain to staff already stretched thin during the pandemic.

These networks will carry our Tribe through the pandemic and can be leveraged for cultural revitalization projects for language, current events and providing coverage during ceremonies and gatherings. The Tribe supports NTIA's efforts to provide relief during this global pandemic and commends NTIA for seeking out Tribal input in designing the program.

Thank you for the opportunity to provide comments on the development of the Tribal Broadband Connectivity Grant Program.

Sincerely,

Richard Button
02-12-2021