



NISQUALLY INDIAN TRIBE

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Re: NTIA Tribal Broadband Connectivity Grant Program Consultation

Greetings and we hope this finds you well,

Nisqually appreciates the opportunity to participate in the consultation process.

We have made great strides here in Nisqually to deliver meaningful services to our Government, Agencies, Businesses and ultimately our Membership and Community. We have much work left to do as we continue to leverage technology as an additional means to enhance the lives of Nisqually people and those around us.

Below are Nisqually Indian Tribe comments regarding the Tribal Broadband Connectivity Grant Program.

1. Funding must be available for (off reservation) middle mile and or backhaul requirements that will support the qualifying services and recipients.
 - a. Tribes should not be at the mercy of any (one) provider for backhaul services.
 - b. Many tribes are in areas where no middle mile providers exist and therefor would not benefit from (on reservation) funding.
 - c. Middle mile fiber lease may not be an option, (even if it exists) depending on available spare fibers. Existing carriers could be at capacity.
 - d. Tribes have long felt the high cost that existing providers have given for T1 (inferior services) and other services for reasons of their remoteness. Focus should be on the delivery of broadband services at an “affordable rate”. Seeing the NTIA cannot regulate this process, worst case scenario should be assumed and accounted for with funding to reach the nearest Tier 1 POP. As soon as tribes are forced to be reliant on outside carriers, they will be at the mercy of those providers. We need to remember these same providers have failed to deliver broadband services to our areas and work off ROI “ONLY”.
2. Applications from tribes looking to apply together with a joint application should be given high priority. Public private partnerships are encouraged but this funding is to support tribes. Tribes feel more secure if the middle mile is owned by the tribe for reasons of both security and sovereignty. This focus would encourage tribes to work together and benefit from other tribes endeavors.
3. The funding should be used to support tribes wishing to utilize another tribes educational, health and government to government communications services.
4. Tribes should be able to self-certify what is unserved or underserved on their own territory as the FCC broadband map is not a true reflection of where qualifying internet services are

available. A company with experience conducting surveys should be appointed to assist tribes in the process and be qualified to certify the results.

5. Funding should include the required central office and supporting hubs necessary to support the network.
6. Priority should be given to tribes that are shovel ready.
 - a. Some tribes will see this as an opportunity to pursue funds with no real plan.
 - b. By shovel ready, a plan should be developed by application submittal, detailing a pre-engineered route design, permits required, county prevailing wage, cost of engineering, permitting, construction and electronics. These costs should reflect industry standard costs for their region.
 - c. If the tribe has conducted a feasibility study for the project, they should receive higher funding priority as the plan will support a higher likelihood of success.
7. An established plan shows the project had previously been identified as a priority, prior to the available funds being announced. We feel this is important as future funding from the government could be limited if awardees are unsuccessful in their efforts. This effort should serve to highlight what can be done when tribes have a say in deploying the needs of their reservation.
8. Priority should be given to tribes that have worked to establish partnerships or letters of support from their state, county, or municipal agencies.
9. Digital inclusion should be considered, and technology centers are a way to support community broadband technology.
10. We believe tribes should be allowed to submit more than one application.
 - a. Some tribes have more than one region and NTIA might find that one region has a successful application while another does not.
11. Economic impact of the project should be considered as the effect of some projects could benefit more than the tribe itself and pave the way for unserved non-tribal projects.
12. Preventing disconnect will be important to those who have broadband facilities. These are items that typically are overlooked. Funding consideration should be given to central office, repeater stations and hub sites to support networks and sometimes this will require crossing the non reservation lands to get to the discontinuous lands and Tribal Service Areas.

We thank NTIA in advance for considering our comments; no tribe is identical, what works for one does not work for all. We look forward to seeing the many great comments that have come from the consultation process come to fruition in the final draft.

On Behalf of the Nisqually Indian Tribe

Best Regards,

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