



February 11, 2021

U.S. Dept. of Commerce  
National Telecommunications and Information Administration  
Washington, D.C. 20230  
[broadbandusa@ntia.gov](mailto:broadbandusa@ntia.gov)

RE: Comments on Tribal Broadband Connectivity Program

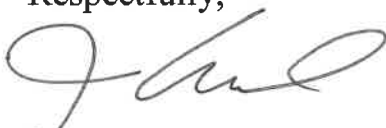
The Pueblo of Laguna makes the following suggestions concerning the Tribal Broadband Connectivity grants as authorized under Public Law 116-260:

1. A **Tribal resolution** or letter of support **should be required** for any applications purporting to serve Tribal lands.
2. The evaluation of applications should be **based on tribal need** – not primarily population – as the law states that there should be an “equitable” allocation of available funding.
3. Duplication of funding:
  - The duplication of services or funding should be evaluated by **eligible entity** rather than by geographic area, due to inaccurate mapping data.
  - Promises or potential of **future funding** (e.g., the Rural Digital Opportunity Fund (RDOF)) **should not be regarded as duplication** of funding that would exclude Tribes from qualifying for funding under this grant program.
  - Tribes should be **eligible to receive funds to serve their own communities**.
4. Having **2.5 GHz (giga-hertz) rural tribal licenses** from the FCC **should not be a pre-condition** for funding, **but could be a positive factor**, as in Laguna’s case, to favor or prioritize an application.

5. One of the eligible uses of funding should be for the construction of **middle-mile fiber**, as this is a critical missing piece to bringing broadband of sufficient speed and capacity to meet the needs of Tribal communities and stated objectives of the funding.
6. **Matching funds should not be required** of any applicant, as this is not required under the law and will provide a barrier to entry for many Tribal applicants during the COVID-19 pandemic.
7. Tribes should be able to **self-certify un-served** or under-served status (whether because of technology, geography, or economic limitations) and NTIA should **not rely on marketing statements** of alleged current providers as accurate conditions affecting eligibility for funding.
8. Tribes that already operate their own **Internet Service Provider** should be eligible for funding.
9. Tribes should be encouraged to use funding to purchase **carrier-grade equipment** rather than temporary, low-grade solutions.
10. Expenses of long-term **indefeasible rights of use (IRUs)** should be **eligible** for funding along with any viable solution (e.g., partnerships, software and hardware licensing, planning and engineering, etc.).

Thank you for the opportunity to provide comments on this matter. Please advise James Burson, Government Affairs Director ([jburson@pol-nsn.gov](mailto:jburson@pol-nsn.gov)) if you have any questions regarding our comments.

Respectfully,



John E. Antonio, Sr.  
Governor