

February 11, 2021

National Tribal Broadband

RE: Tribal Broadband Grant Program

Dear NTIA leadership,

Tanana Chiefs Conference is a non-profit intertribal consortium of 37 Federally-recognized Indian tribes and 41 Alaska Native communities located across Interior Alaska including Fairbanks. TCC serves 16,000 Alaska Natives living in Fairbanks and in the rural villages located along the 1,400 mile long Yukon River and its tributaries. TCC's service area encompasses 235,000 square miles, about the size of Texas. Because of the remoteness of our communities and the lack of high speed internet/broadband, this topic is a high priority for the leadership of our tribes.

Comments for Broadband listening session:

1. Definition of Indian Land – we would encourage NTIA's to use of the federal definition of Indian Land as amended by Section 8013 of the Energy Act of 2020 passed at the very end of 2020. Section 8013 amends the definition of Indian land in the Energy Policy Act of 1992 to include any census tract occupied by a majority of residents who are members of an Alaskan Native Tribe and reflects Alaska's unique history of diverse and unique land claims
2. Due to Alaska's unique situation, we specifically want to ensure that the full purchase price of IRUs on terrestrial fiber and with regard to satellite capacity are an allowable expense under the NTIA Tribal Broadband funding as this will allow us to maximize the long term benefit of available funds to our tribes and tribal members.
3. Time table to spend down funds – Interior Alaska has a very unique and very limited construction window or approximately 4-6 months of the year. This is compounded by challenging logistics schedules as many of our villages are only accessible via barge for four months of the year and not connected by roads for bringing in certain equipment. It was mentioned the timeline for construction was very minimal at 360 days to expend funds. In Alaska, we would respectfully request a 3-year window to spend down funds due to our challenging weather and logistics.
4. Formula Funding – TCC represents 37 federally recognized tribes across a 235,000 sq mile area. This is an area just slightly smaller than the state of Texas with fewer miles of navigable roadway than the state of Rhode Island. TCC represents 6% of the federally recognized tribes nationally and our state frequently ranks last for broadband connectivity. Our populations are small, our distances far and our needs great. A formula that was used in the distribution of ICDBG funds during the American Recovery and Reinvestment Act, for the disbursement of COVID19 relief funds and in the VW Settlement Tribal Environmental Mitigation Trust allocates 50% of the available funds to be dispersed on a pro rata share based on tribal population for each applicant. The other

50% of funding is evenly disbursed between the number of federally recognized tribes who apply by using the total number of applicant tribes for the funding as the numerator and 574 tribes as the denominator. I am happy to provide more information as needed to this methodology but on behalf of the many small tribes across Indian country, we feel this method provides a fair opportunity for smaller tribes who face substantial need.

Thank you for allowing us to provide our input and best wishes with the initiative.

Sincerely,



Pollack Simon, Jr., Chief/Chairman
Tanana Chiefs Conference

cc: Natasha Singh, Tanana Chiefs Conference