

Wiegand, Ryan

From: Liz Malerba <LMalerba@USETINC.ORG>
Sent: Thursday, February 11, 2021 5:11 PM
To: Kitcki Carroll; Wanda Janes; Brian Howard; Brandy Venuti; Loren Estolt
Cc: USET President Chief Kirk E. Francis, Sr.; Lynn Malerba; USET Treasurer Chief B. Cheryl Smith; USET USET SPF Treasurer Chief Cheryl Smith; USET Vice President Vice Chairman Robert R. McGhee
Subject: USET SPF Comments to NTIA on Tribal Broadband Connectivity Grant Program
Attachments: USET SPF Comments_NTIA TBCGP_FINAL 2_11_21.pdf

Dear Associate Administrator Kinkoph,

On behalf of the United South and Eastern Tribes Sovereignty Protection Fund (USET SPF), we submit these comments in response to Tribal Consultations held by the National Telecommunications and Information Administration (NTIA) on the implementation of the recently established \$1 billion Tribal Broadband Connectivity Grant Program (TBCG Program). This program was created in response to the COVID-19 pandemic and its profoundly negative impact on every governmental, economic, and service delivery function of Tribal Nations. Decades of broken promises, neglect, underfunding, and inaction on behalf of the federal government have left Indian Country severely under-resourced and at extreme risk during this crisis. Our existing systems of service delivery and infrastructure are experiencing greater stress than those of other units of government, as we seek to maintain essential services and deliver upon our commitments, as well as dedicate resources to the unique circumstances of COVID-19 response.

On February 2, 2021 NTIA announced three Tribal Consultations scheduled for February 5, 10, and 12, 2021 to receive recommendations from Tribal Nations regarding implementation of the TBCG Program. USET SPF has several concerns regarding questions posed by NTIA during these consultations, which will inform how they agency will structure the implementation and disbursement of TBCG Program funds. Specifically, we are concerned that program funds could potentially be allocated in a manner that does not support equitable access for all Tribal Nations. Similarly, USET SPF is concerned with questions posed by NTIA regarding the streamlining of historical, environmental, and cultural review processes for infrastructure deployment. In structuring the TBCG Program, NTIA must support and uphold our sovereign right to determine how best to use these funds for the benefit of our citizens. NTIA must ensure that funding is delivered via the most expedient mechanisms while providing sufficient opportunity and equitable access for all Tribal Nations to receive and expend these resources.

Acknowledging and understanding the diversity of Indian Country's circumstances and priorities for broadband access will further NTIA's directive to equitably disburse TBCG Program funds. As NTIA proceeds in structuring the funding allocation and programmatic requirements and deliverables of the TBCG program, it is imperative that all due circumstantial considerations be given to benefit Tribal Nations. In the arena of federal broadband funding and support for Tribal Nations, NTIA has largely been absent and an unknown federal entity in Indian Country. However, implementation of the TBCG Program provides NTIA with an opportunity to build upon its delivery of trust and treaty obligations to Tribal Nations. While the TBCG Program will not solve all the broadband access and connectivity issues throughout Indian Country, it has the potential to lay a foundation for addressing Tribal Nation broadband disparities during and after the COVID-19 crisis. USET SPF looks forward to continuing to work with NTIA to close the digital divide in Indian Country, including through the equitable disbursement of TBCG funds. Should you have any questions or require further information, please contact me using the information below.

Thank you,
Liz Malerba ~ *Citizen of the Mohegan Tribe*
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USET/USET SPF staff are currently teleworking until further notice. We will continue to assess the COVID-19 situation and its impact on our operations. We ask for your patience should you experience any challenges reaching any one of our staff. Additionally, please be aware that the USET/USET SPF organization has created a COVID-19 Resource & Information page which is being updated on a frequent basis. <https://usetinc.org/covid19/>



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