



The Confederated Tribes of the Colville Reservation
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Monday, April 05, 2021

Federal Communications Commission
Attn: Molly O'Connor
Derek Goatson
45 L Street, NE
Washington, D.C. 20554

RE: Emergency Connectivity Fund for Educational Connections and Device to Address the Homework Gap During the Pandemic

Dear Ms. O'Connor and Mr. Goatson:

The Confederated Tribes of the Colville Reservation are submitting the following comments regarding the Emergency Connectivity Fund for education connections and devices to address the homework gap during the pandemic.

1.1 Eligible Schools and Libraries.

The Colville Confederated Tribes agrees that making changes to the rules to allow for the Library Services Technology Act (LSTA) to be consistent across the board. This is beneficial to both the US government so that it can meet its obligations to Tribes, and beneficial to the Tribes so that their community libraries may be eligible for this funding opportunity thus taking one more step to bridging that digital divide.

1.2 Eligible Equipment and Services.

CCT agrees that funding should be restricted to equipment or services needed to provide connectivity, hence the name of the program "emergency connectivity fund". This includes, but is not limited to, direct internet services (25/3 or better) both wired or wireless (satellite providers should not be eligible due to lag that prevents best use), firewalls, routers and switches (including wireless routers), laptops, tablets, in some cases phones (in some instances, a cellular phone would be optimal as it could not only provide the educational connection but also a public safety connection depending on the remoteness of the student), etc. This is especially important to tribal lands in rural locations, such as the Colville Tribes. This funding should also be available for software suites as some software is needed in order to work (for example, MS office or a PDF reader).

Based on the above, the Colville Tribes proposes that non-traditional services be considered as eligible under the emergency connectivity fund. One prime example is centralized storage. For larger schools the ability to house the appropriate software suites or just adding on additional network devices can overload existing systems. In addition, expenses related to network environment should be considered because items like storage space are needed for purposes such as expanding email resources. Another example of a non-traditional use would be graphic card upgrades to improve resources. As an example, a school may have laptops that could be used except they are incompatible with existing infrastructure so they may all need graphic card upgrades to allow for better streaming. Under the current model a school may not be able to upgrade existing machines, and may have to buy brand new machines that are more expensive and the existing resources are wasted. It is important to keep in mind the need for flexibility and too many rules may have a negative and the reverse effect as well as being less cost efficient.

1.3 Definitions/

The Colville Tribes agrees that the current definitions are broad and generally speaking this is appropriate. Painting ourselves into a corner by putting down too many specifics is problematic and will increase costs. Framing the language more broadly increase the ability to be resource efficient and allows for the flexibility needed to address problems that vary greatly from tribe to tribe, depending on its location. Leaving the possibility of desktops being purchased in the language is preferable because in some cases a desktop may make more sense than other devices, especially if we look at it from the schools point of view. They will be the "focal point" of the learning, so a couple of hundred students each day will be on that network connecting to a handful of teachers. It makes sense that teachers may need to purchase heavy duty desktops in order to multitask work and ensure that they can meet the needs of the students. It does no good if you can connect to the streaming class but can't pull up a web page because your resources are tapped out.

1.4 Remote Learning.

As stated before, putting too many restrictions and rules in place only hurt us all in the end. I understand there must be a balance between accessibility and funding. The Colville Tribes agrees that devices should be able to support streaming services, we also would like to once again point out that simply being able to stream on a device does not necessarily mean that it can do everything it would be required to do. We should be looking realistically at base requirements for the existing needs and asking what combination of hardware and software are the best use of resources. The Colville Tribes hopes that when it comes time for the FCC to make a decision, they will have done some homework and can present some baseline options for each device category.

1.5 Advanced Telecommunications.

Additional funding of \$6-12 billion is still needed to bridge the digital divide because the existing rules and restrictions do not allow for the necessary flexibility to address issues that are common in remote and rural communities. The purpose of this fund is "emergency connectivity" and the focus should be on connectivity. The Colville Reservation has limited internet resources available to its communities and it is important to recognize this discrepancy. The Colville Tribes proposes that a portion of this fund be set aside to reimburse construction costs to provide services to eligible libraries and schools. Under normal circumstances The Colville Tribes recognizes that in some cases, the strict rules in place are necessary, but in the current situation they are too restrictive and don't offer the flexibility necessary to address the needs of the communities. Right now, it is more important to have flexibility to address the concerns and needs of the public.

1.6 Minimum Service Standards.

The Colville Tribes recognizes that to many 25/3 isn't adequate; however, what they fail to recognize is that when you have nothing, 25/3 sounds really good. The Colville Tribes does not see the reasoning for raising that benchmark at this point, given the current conditions. We aren't talking about improving networks for the most part, we are talking about creating new ones were nothing currently exists. Because the current situation is that there aren't sufficient options, the Colville Tribes notes that 25/3 is a perfect benchmark for new networks to hit.

1.7 Service Locations.

The Colville Tribes proposes that if the FCC imposes any per site restrictions that they take into consideration the size of the site. The more rural schools don't have many options and often were not built with wireless internet in mind. Thus in some cases it may be prudent to bring in 2 services lines instead of trying to rewire an entire building.

1.8 Access.

The Colville Tribes currently has "technology centers" located in 2 of its 4 districts. These were paid for through U.S. Department of Agriculture community connect grants several years ago. The Colville Tribes proposes that centers like this, where computers are provided for learning and other uses, be eligible for not only equipment upgrades but their internet services should be eligible for reimbursement as well. These technology centers often see as many as 50 people a day and provide internet connected devices to any and all who wish to use them, in a community where internet resources are limited. Although not a library and technically not a school (we do offer computer classes) this facility has been used throughout the past year to provide students with access for school, where they may not otherwise have had this resource. To accommodate this use, they were closed to the general public for approximately 6 months so that only students could use them, and additional centers were opened in each of the other districts. The Colville Tribes would like to see these "hotpot" sites included in funding opportunities in order to ensure that these resources continue to be available.

1.9 Eligible Uses.

The Colville Tribes agrees that setting rules on what the devices should be used for is appropriate. Without a fool proof way of locking down all the devices security becomes an issue. It's something that needs to be considered when talking about equipment procurement. Using the best available firewalls should be encouraged, they're more expensive, but they also provide a level of support that most schools and libraries would need as they typically do not have engineers on staff. The Colville Tribes sees security as the number one concern coming out of all of this.

1.10 Reasonable Support Amount.

The Colville Tribes would like to see a portion of the funding(a percentage) set aside for Tribal specific use. Every white paper that's come out over the last decade, in regards to broadband access, have consistently pointed out the lack of broadband access in Indian Country. More specifically how Tribal lands continue to fall behind even as our rural counterparts are moving ahead. Given this data and the Federal Governments trust responsibility to Tribes, the Colville Tribes believes that setting aside monies specifically for tribes serves everyone's best interests.

Thank you for your time and consideration.

Sincerely,


Rodney Cawston
CHAIRMAN