

The Honorable Ajit V. Pai Chairman
Federal Communications Commission
445 12th Street SW, Washington, DC 20554

RE: WT Docket No. 18-120; Transforming 2.5 GHz Band – Rural Tribal Priority Window

Dear Chairman Pai:

The Tribal members of the Native Nations Communications Task Force (NNCTF) write to express concern that eligible tribes' opportunity to file for radio spectrum through the 2.5 GHz Rural Tribal Priority Window has been heavily impacted by the COVID-19 pandemic. The Tribal members of the NNCTF recommend the filing deadline for Rural Tribal Priority Window be extended for three months.

Applying for a 2.5 GHz license through the Commission's Rural Tribal Priority Window consists of more than filling out forms and submitting information online via the Universal Licensing System. The Commission's Wireless Telecommunications Bureau recognizes this when urging potential licensees prior to filing to consider due diligence factors such as:

- 1) how much unassigned eligible 2.5 GHz spectrum is available;
- 2) equipment siting, site acquisition, and/or leasing;
- 3) technical requirements, including infrastructure and other network equipment;
- 4) neighboring operations that must be protected from interference;
- 5) system financing or partnership arrangements;
- 6) system administration and management; and
- 7) network and backhaul needs.

The Commission was helpful in extending the Rural Tribal Priority Window through a 182-day filing period, which began on February 3, 2020. We are greatly appreciative of your work to accommodate our request so that Native Nations have adequate time to seek licensure to provide critical services on tribal lands and in furtherance of the federal government's trust responsibility. However, in the midst of this pandemic, we believe the current August 3 deadline will hinder the overriding purpose of the Commission's original decision to extend this timeline and will result in deployment failure of projects in the 2.5 GHz Band on tribal lands.

With both tribal and state stay-at-home orders in place across most of Indian Country, and as the rates of positive cases of COVID-19 dramatically increase across the country, Native Nations are working to prioritize life-saving measures and deployment of critical government services to combat the negative impacts of the pandemic in an effort to keep their respective tribal communities safe. While critically important to tribal governments and their entities, the 2.5 GHz spectrum opportunity has necessarily taken a subordinate position in this national emergency. This pandemic has created unparalleled barriers for Indian Country to focus on. Tribal leadership, and elected leadership across the country, have poured resources into emergency health care, public safety, unemployment, and other immediate needs, while combatting the coronavirus, in an effort to keep the country afloat.

Tribal members of the Task Force greatly thank you for your time and attention to this matter.

Submitted by Danae Wilson, Nez Perce Tribe, on behalf of the Tribal members of the Native Nations Communication Task Force

cc: Hon. Michael O'Rielly, Hon. Brendan Carr, Hon. Jessica Rosenworcel, Hon. Geoffrey Starks