



Affiliated Tribes of Northwest Indians

Dedicated to Promoting Tribal Self Determination & Sovereignty

May 25, 2021

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Federal Communications Commission
Wireline Competition Bureau
Telecommunications Access Policy Division

RE: WC Docket No. 09-197

Affiliated Tribes of Northwest Indians (ATNI) is submitting comments on the Public Notice, DA 21-515. Referencing the Wireline Competition Bureau seeking comment on Rural Digital Opportunity Fund (RDOF) Petitions for designation as an Eligible Telecommunications Carrier (ETC), WC Docket No. 09-197.

StarLink was a winning bidder in the RDOF auction (Auction 904). There is a requirement that the winners must be an ETC and offer Lifeline discount on all qualifying service areas where an ETC receives high-cost support. The networks deployed must also be capable of delivering service that meets the minimum standards of the Lifeline Program.

ATNI has serious concerns with the following:

1. First and foremost, that Tribal lands are being claimed in applications without consultation or input from the Tribes on those applications.
2. Access to federal funding for Tribes to serve their lands and communities. Once an ETC receives funding, an area is considered served, which then means Tribes are not able to received federal funding.
3. Tribes ability to receive service at reasonable rates. It's well known that StarLink's steep upfront costs for service and high monthly rates will be unreasonable and unattainable for Tribal communities to obtain quality service.
4. Tribes are concerned over the bandwidth availability from StarLink. Historically satellite service has always been available yet, unreasonable, due to delays specifically in voice coverage let alone for todays reliance on video conferencing capabilities and school at home. These delays will directly impact effective participation.

ATNI would request that before any carrier is granted Tribal lands in applications for federal funding that:

- consultation be a requirement with supporting documentation of the consultation
- if carriers are claiming Tribal lands that there be requirement to build out those lands first.

Historically we've seen Tribal lands claimed in other federal funded programs where the carrier is able to deploy all other application defined areas except Tribal lands.

Respectfully,

Leonard Forsman, President
Affiliated Tribes of Northwest Indians