

NORTHERN CHEYENNE TRIBE
TRIBAL HISTORIC PRESERVATION OFFICE

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June 15, 2017

Federal Communications Commission)
445 12th Street SW)
Washington, DC 20554)

WT Docket No. 17-79

COMMENTS OF THE NORTHERN CHEYENNE TRIBE ON NOTICE OF PROPOSED RULEMAKING FOR
ACCELERATING WIRELESS BROADBAND DEPLOYMENT BY REMOVING BARRIERS TO INFRASTRUCTURE
INVESTMENT

RE: On the “Super Bowl Project”

The so-called “Super Bowl Project” is one project that industry has pointed to as an example of why the FCC 106 process does not work, and why Tribes are an issue. Their allegations range from this “one project” was costing “hundreds of thousands of dollars” and that there were needless delays because of tribal nations reviews. This is misleading at best, and it is dishonest at worst. A couple issues here should be cleared up.


- 1) These projects were not submitted to the FCC or the Northern Cheyenne Tribe as a single project. Instead, they were submitted to tribes as 24 different, unique projects – with individual projects names and TCNS numbers for each project.
- 2) The projects were submitted to the FCC on March 1, 2016 with no files attached. Nearly two months later, on April 29, 2016, the projects were submitted to our tribe.
- 3) The reported cost of this “single project” was inflated to include the cost of 40 projects scattered across the state of Texas.
- 4) Industry makes false claims that the tribe did not send concurrence on these projects until December 15, 2016. We sent our concurrence letters out for these projects May 3, 2016. Within a week of them being submitted to the Tribal Historic Preservation Department.

**LITTLE WOLF AND MORNING STAR - Out of defeat and exile they led us back
to Montana and won our Cheyenne homeland that we will keep forever.**

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This example seems to be, not as indicated by the telecommunication industry, as tribes working the system and an "increasing economic burden," but poor project management and wild exaggerations on behalf of industry looking to discredit the process. It is sad when our partners in cultural resources behave like this. This is not an honest assessment of the situation and the use of such techniques in the rulemaking docket discussion and subsequently in the media is slandering the tribes and the process. The FCC should not allow this shameful, dishonest, and borderline criminal action on the part of the telecommunication industry.


Teanna Limpy
Tribal Historic Preservation Officer

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