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July 2, 2020

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Rural Tribal Priority Window, Transforming the 2.5 GHz Band, WT Docket 18-120*

Dear Ms. Dortch:

By this letter Cisco Systems, Inc. (“Cisco”) writes to express its support for an extension of the Rural Tribal Priority Window for vacant 2.5 GHz spectrum in rural Tribal lands (the “Tribal Window”). Due to the ongoing pandemic and the corresponding economic disruption, a Tribal Window extension of 182 days to February 1, 2021 would advance the public interest. Cisco joins with many of the other entities that have previously filed requesting an extension of the Tribal Window including the National Tribal Telecommunications Association.<sup>1</sup> Cisco applauds Chairman Pai and each of the Commissioners in their unanimous efforts to establish the Tribal Window to “help the most marginalized communities in the country gain access to services using this transformative spectrum band.”<sup>2</sup>

Connectivity vis-à-vis reliable and cost-effective broadband is essential in modern life and has never been more clearly demonstrated than during the current crisis. Without it, young people fall behind in school; older people and people with chronic medical conditions cannot effectively be delivered medical and health services; social and familial connections cannot be safely maintained and nurtured; entrepreneurs and small businesses cannot access credit and banking services, suppliers and customers. In the case of poorer, rural people, those living on the wrong side of the digital divide risk falling further behind.

In the *Order* establishing the Tribal Window, the Commission recognized that “members of federally-recognized American Indian Tribes and Alaska Native Villages and other residents of Tribal

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<sup>1</sup> Motion of the National Tribal Telecommunications Association for Extension of Time for Rural Priority Window Applications, WT Docket No. 18-120 (filed Apr. 30, 2020); Letter from Danae Wilson, Nez Perce Tribe, on behalf of the Native Nations Communications Task Force, to Ajit V. Pai, Chairman, Federal Communications Commission, WT Docket 18-120 (filed May 7, 2020); Letter from Loris Taylor President and CEO, Native Public Media & Mariel Triggs, CEO MuralNet, to Ajit Pai, Chairman, Federal Communications Commission, WT Docket 18-120 (filed Mar. 25, 2020).

<sup>2</sup> *Transforming the 2.5 GHz Band*, Report and Order, 34 FCC Rcd 5446, 5519 (2019) (“*Order*”) (Statement of Chairman Ajit Pai).

<sup>3</sup> *Id.* at 5463 ¶ 47 (citation omitted).

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lands have lacked meaningful access to wired and wireless communications services.”<sup>3</sup> The opportunity to apply for the available Educational Broadband Spectrum (“EBS”) covering Tribal lands is an important first step for Native American Tribes and Alaska Native Villages in their efforts to provide more robust broadband service in their communities. Without the ability to take that first step, the opportunity could be lost for many Tribes that have not been able to complete applications during the pandemic.

As Chairman Pai recently explained, “[t]ribal communities are having to adjust to the challenges of the coronavirus pandemic while already facing some of the greatest challenges caused by the digital divide that we see anywhere in the nation.”<sup>4</sup> Many Tribes have understandably focused their efforts on the health and safety of their residents, and have not had the luxury of focusing resources on the approaching Tribal Window deadline.<sup>5</sup> In an effort to slow the spread of COVID-19, Tribal operations throughout the country have been reduced to essential employees and critical operations.<sup>6</sup> A grant of the extension of the Tribal Window would ensure that many additional Tribes would have the opportunity to apply for the vacant EBS spectrum, giving the future licensees the ability to offer reliable, cost effective, and fast wireless broadband service covering unserved or underserved Tribal lands. Without an extension, we fear many Tribes and their members will miss out.

Given the unprecedented nature and impact of COVID-19 on all aspects of Tribal life, Cisco urges the Commission to extend the Tribal Window until February 1, 2021. Tribes should be given a greater opportunity to apply for spectrum that has the potential to alter the paths of many lives across Tribal lands.

Sincerely,

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<sup>4</sup> News Release, Federal Communications Commission, *FCC Grants The Navajo Nation Temporary Spectrum Access To Meet Increased Wireless Broadband Needs During COVID-19 Pandemic* (Apr. 17, 2020).

<sup>5</sup> See Liz Mineo, *For Native Americans, COVID-19 is ‘the worst of both worlds at the same time’*, The Harvard Gazette (May 8, 2020).

<sup>6</sup> See Letter from Gregory W. Guice, Counsel for Gila River Telecommunications, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket 18-120, at 1 (filed May 7, 2020).