

National Tribal Telecommunications Association
Federal Regulatory Position
July 2018

Broadband Deployment Availability, and Universal Service

- Broadband Deployment: The Need in Tribal areas
- Universal Service: Operations and Maintenance in Tribal Areas
- Access to Broadband-Capable Spectrum
- Revisions to better focus support for Tribal areas broadband (*see below*)
- Address Current Constraints on Federal High-Cost Support

Lifeline and Broadband Adoption

- Continue to Recognize Increased Need in Tribal Areas
- Increase Enhanced Tribal Lifeline Credit to Recognize Broadband Services
- ETC Designation and Oversight of Lifeline Providers in Tribal Areas

Tribal Sovereignty

- Warm Springs Telecom ILEC Petition
- Better Coordination with FCC, ONAP, USAC, etc.
- Tribal Engagement Rules
- Tribal Area Infrastructure Siting and Control

High Cost Program Revisions

- ✓ For CAF BLS, reduce the monthly \$42 per loop end-user revenue imputation by 25% to represent the lesser ability of customers in Tribal areas to afford broadband services. This will tend to increase CAF BLS for participating carriers
- ✓ For HCLS, revise the frozen NACPL for participating carriers in order to increase HCLS support in an amount similar to NTTA's original plan (25%), or increase the threshold of support provided via the HCLS algorithm
 - For study areas with 200,000 or fewer loops, and for SACPLs between 115% and 150% of the NACPL, HCLS covers 65% of the SACPL. NTTA proposes to increase this percentage by 25% to 81.25%
 - For study areas with 200,000 or fewer loops, and for SACPLs in excess of 150% of the NACPL, HCLS covers 75% of the SACPL. NTTA proposes to increase this percentage by 25% to 93.75%
- ✓ RoR carriers serving predominantly Tribal areas would be eligible for this revised treatment, on an elective basis.
- ✓ Additional buildout obligations (25/3 Mbps) will be attached to the revised mechanism
- ✓ Support resulting from this revised mechanism will also help carriers serving Tribal areas with the high cost of operations and maintenance
- ✓ Does not represent a new federal support mechanism, but rather modifications to current mechanisms