

AK-CHIN INDIAN COMMUNITY

Community Government

42507 W. Peters & Nall Road • Maricopa, Arizona 85138 • Telephone: 520.568.1000 • Fax: 520.568.1001



August 31, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-B204
Washington, D.C. 20554

Re: Comments regarding FCC Notice of Proposed Rulemaking (Proceeding 18-120)

Dear Secretary Dortch,

The Ak-Chin Indian Community would like to thank the FCC for the opportunity to provide comment on proposed rulemaking that would make unused portions of the 2.5 GHz band (2496-2690 MHz) available to Native nations in rural areas.

In general, rural Native nations have inadequate access to broadband service, creating a disparity that grows daily as society becomes increasingly dependent on internet-based communications. Expanding access to the 2.5 GHz band will enable the federal government to fulfill its trust responsibilities to sovereign Native nations while strengthening tribal self-determination. The Ak-Chin Indian Community would like to make the following recommendations regarding disbursement of unused portions of the 2.5 GHz band:

- Native nations should be granted a local priority filing window to obtain spectrum before other entities, including current licensees seeking to expand.
- For Native nations, the geographic service area should be marked by reservation boundaries rather than census tracts or counties.
- During the local filing window, Native nations should have the option of acquiring all available channels in the 2.5 GHz band on their respective reservation lands.

- If a GSA is not determined by reservation boundaries, educational entities on tribal lands (Head Start, K12, tribal colleges and universities) should have a concurrent priority filing window (alongside Native nations).
- We request a 90-day notice before the any priority filing window is introduced and 60-days within which to file for unused spectrum.

We thank you for the opportunity to provide comments and urge the FCC to consider the importance of internet-equity for Native nations as it makes unused portions of the 2.5 GHz band available, prioritizing communities that have become increasingly disenfranchised in the digital age.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Miguel', with a stylized flourish at the end.

Robert Miguel
Chairman