



# LEECH LAKE BAND OF OJIBWE

*Faron Jackson, Sr., Chairman*  
*Arthur LaRose, Secretary-Treasurer*

*Penny DeVault, District I Representative*  
*Steve White, District II Representative*  
*LeRoy Staples Fairbanks III, District III Representative*

---

11/13/2017

Hon. Chairman Ajit Pai  
Hon. Commissioner Mignon Clyburn  
Hon. Commissioner Michael O'Rielly  
Hon. Commissioner Brendan Carr  
Hon. Commissioner Jessica Rosenworcel  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Proposed Changes to the Tribal Lifeline Program; WC Docket Nos. 17-287, 11-42, 09-197

Dear Chairman Pai and Commissioners Clyburn, O'Rielly, Carr and Rosenworcel:

The Leech Lake Band of Ojibwe submits this letter in opposition to the Draft Lifeline Item released by the FCC on October 26, 2017. The Lifeline program rule changes proposed in the item will have a significant and adverse impact on Tribal Nations, including the Leech Lake Band of Ojibwe.

As a preliminary matter, the Tribe notes that the Federal Communications Commission (FCC) failed to properly consult with Tribal Nations on the FCC's newly planned changes to the Tribal Lifeline program. This failure is unacceptable and an affront to the sovereignty of Tribal nations across the United States. Moreover, it sets a dangerous precedent for future federal agency actions which affect Indian Country. We therefore respectfully request that the FCC's Office of Native Affairs and Policy (ONAP) schedule a proper consultation with affected Tribes prior to adopting proposed changes to the Tribal Lifeline program, in accordance with FCC's 2000 Tribal Policy Statement. Moreover, I request that the FCC defer any action on this item until such time that the consultation has been completed.

Like tribal communities, and non-Indian communities everywhere, our membership relies heavily on wireless communication services for basic and sometimes critical communications. It is imperative that services be available to avoid catastrophe and the loss of human lives in natural or man-made disasters.

We are especially disconcerted with the FCC's proposal to eliminate resellers from the Tribal Lifeline program. Wireless resellers offering enhanced Tribal Lifeline service generate revenue for the Tier 1 service providers that can be invested to expand wireless infrastructure on Tribal lands, a crucial need for the Leech Lake Band of Ojibwe.

Wireless resellers have developed specialized business models to connect with residents of our Reservation; resellers currently provide critically-needed Lifeline service to many low-income individuals on the Leech Lake Band of Ojibwe Reservation. If these companies are no longer permitted to provide Tribal Lifeline service; it will be difficult, and in many cases impossible, for members of the Leech Lake Band of Ojibwe to obtain affordable voice and broadband services.

We look forward to consulting with the FCC on these issues and working with the FCC prior to the adoption of any rules affecting the Lifeline program on Tribal lands to ensure that its policies serve the unique interests of Tribal nations.

Sincerely,

Robert Budreau, Jr.  
Executive Director  
Robert.budreau@llbo.org

|