

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
A National Broadband Plan for Our) GN Docket No. 09-51; FCC 09-31
Future)

To: The Commission

**REPLY COMMENTS OF NATIVE PUBLIC MEDIA
AND THE NATIONAL CONGRESS OF AMERICAN INDIANS**

Native Public Media (“NPM”) and the National Congress of American Indians (“NCAI”) respectfully submit these reply comments in response to the initial comments filed regarding the Commission’s Notice of Inquiry (“NOI”) for the development of a national broadband plan (released on April 8, 2009).¹ As NPM is an organization committed to promoting access to and ownership of all media of communications by Native communities, and NCAI is the oldest and largest national organization representing federally-recognized Tribal government entities, both NPM and NCAI fully support a national broadband plan aimed at establishing or improving access to important broadband technologies by Tribal residents and other unserved and underserved communities across the country.

I. BACKGROUND

NPM represents the interests of thirty-three Native owned public radio stations that serve Native nations as well as non-Native listeners throughout the United States.² Since its launch in 2004, NPM’s primary focus has been supporting existing Native American public radio stations

¹ *A National Broadband Plan for Our Future*, GN Docket No. 09-51, Notice of Inquiry, 24 F.C.C.R. 4342 (2009).

² Native Public Media, formerly known as the “Center for Native American Public Radio,” was created as a center under the National Federation of Community Broadcasters with seed funding from the Corporation for Public Broadcasting. A list of the NPM member stations can be found at http://www.nativepublicmedia.org/index.php?option=com_content&task=view&id=26&Itemid=48.

and promoting ownership for more Native communities by serving as an advocate, national coordinator, and resource center. NPM recognizes, however, that the rapid expansion and innovation occurring in the broadband markets is profoundly changing the way Americans communicate and consume media. Therefore, NPM is focused not only on the needs of Native American radio stations, but also on helping Indian Country gain access to vital broadband services.³

Advocating on behalf of its member Tribes from across the United States in consensus based decision-making, NCAI is a forum for federal-Tribal policy on all of the major issues confronting Native peoples today, including the challenges of broadband deployment. NCAI works and continues to coordinate with the Commission on a number of Tribal outreach and education efforts. NCAI and NPM have co-hosted several of the Commission's Indian Telecommunications Initiatives or "ITI" regional workshops and roundtables, and annually co-hosts the annual high level consultation "FCC-NCAI Dialogue on Increasing Tribal Telecommunications," between FCC officials and members of the NCAI Telecommunications Subcommittee. Since the institution of NCAI's Telecommunications Subcommittee in 2001, NCAI has adopted many resolutions, representing formal national Tribal policy prerogatives, to support the deployment of telecommunications, broadcast and broadband services throughout Indian Country. NPM is a frequent and active participant in NCAI Telecommunications Subcommittee meetings. Both NPM and NCAI are appreciative and pleased to submit these joint reply comments to the Commission.⁴

³ The term "Indian Country" is legally defined to include all Tribal lands, including lands within reservations, dependent Indian communities, and Indian allotments. 18 U.S.C. § 1151 (2006).

⁴ NPM and NCAI appreciate that many inquiries in the NOI relate specifically to Tribal lands. While NPM and NCAI agree with specific comments and proposals advanced by commentators as applied to Tribal lands, agreement on specific points should not be construed to mean that NPM and NCAI agree with the comments as a whole.

As argued in the initial comments, NPM and NCAI believe that improving the communications infrastructure on Tribal lands is critical to the self-government, economic development, civic participation in the national democratic process, and the nation building objectives of federally-recognized American Indian Tribes and Alaska Native Villages (“Tribes or Native Nations”). The deployment of broadband services is essential to the quality of life for Tribal communities and families, not just in terms of residential service, but also with regards to primary and continuing education; telemedicine and distance diagnosis; access to modern media outlets; public safety and homeland security, and, of course, the business-oriented requirements of this primary critical communications infrastructure and need to develop a sustainable knowledge-based economy.

II. BROADBAND DEPLOYMENT BENCHMARKS

In creating its national broadband plan, the Commission must first define the relevant terms and benchmarks. NPM and NCAI advocate for universally applicable definitions that are flexible enough to evolve with technology, yet firm enough to mandate quality broadband access for all Native Nations.

A. Broadband Capability Defined

The Commission sought comment on the how it should define “broadband capability,” and whether this definition should be tethered to a specific speed or technological solution. NPM and NCAI argue against a static definition tied to a specific speed or technology, and believe that broadband access should be defined in terms of symmetrical upload and download capabilities necessary to perform vital tasks over the network. NPM and NCAI thus agree with the Telecom Consulting Associates that a broadband definition should not focus on one specific

technology, and argue that the “definition should allow for the combination of technologies that will be needed to accomplish a ubiquitous network.”⁵

NPM and NCAI also agree with the several commentators who argue that “broadband capability” should not be defined in terms of a static speed requirement. The National Rural Electric Cooperative Association (“NRECA”) “does not believe that the FCC should establish threshold or hard-line data speed standards” and that “[d]efinitions should remain sufficiently flexible to ensure difficult to serve areas are not precluded from service by the adoption of ‘one size fits all’ threshold speeds.”⁶ Similarly, the National Rural Telecom Cooperative urges the Commission to look beyond simple “binary concepts of speed” to encompass a variety of metrics specifically targeted towards rural communities. To further this goal, the Telecom Consulting Associates argue for a flexible definition based on performing tasks over the network, including “telemedicine, telesurgery, videoconferencing, and other video services.”⁷ NPM and NCAI agree with these commenters that a definition of “broadband capability” should be flexible enough both to encompass a variety of technological solutions and evolve as technology improves. In addition, the FCC has a government-to-government responsibility and obligation that it should rely upon to work with Tribal nations as they prioritize and set their own telecommunications priorities. As recognized in the Commission’s Tribal Policy Statement,⁸ NPM and NCAI believe the FCC should consult and work directly with Tribes to ensure that the level of broadband they deem necessary becomes the regulatory and industrial goal for their Tribal communities.

⁵ Telecom Consulting Associates, p. 5-6.

⁶ National Rural Electric Cooperative Association, p. 7.

⁷ Telecom Consulting Associates, p. 5.

⁸ *Statement of Policy on Establishing a Government-to-Government Relationship with Indian Tribes*, Policy Statement, 16 F.C.C.R. 4078 (2000).

B. Access Defined

Additionally, the Commission sought comment on “what it means to have access to broadband capability.” NPM and NCAI recognize that accessibility encompasses several key aspects, including physical access to the services, affordable prices for consumers, and digital literacy training to make the most of the capability.

In defining what constitutes access, NPM and NCAI agree with the Organization for the Promotion and Advancement of Small Telecommunications Companies (“OPASTCO”) that “rural service areas need and demand the ability to utilize all of the same bandwidth intensive applications and services that continue to become available to the rest of the country.”⁹ NPM and NCAI also concur with the Rural Independent Competitive Alliance that the “principles of Section 254 are clear that telecommunications and information services should be comparable between urban and rural, so there should be no implication in the definitions that an inferior system is ‘good enough’ for rural residents.”¹⁰ These commentators make clear, and NPM and NCAI agree, that rural and remote areas such as Tribal lands cannot be given inferior status, and should receive the same “access” as urban consumers.

C. Affordability Defined

NPM and NCAI believe that consumers do not truly have access to broadband capabilities unless these services are affordable. The Commission sought comment on how it should define “affordability” and how this should be measured when deploying broadband services. NPM and NCAI agree with the National Association of Telecommunications Officers and Advisors (“NATOA”) who “strongly urge[] that affordability be a major factor . . . in

⁹ Organization for the Promotion and Advancement of Small Telecommunications Companies (“OPASTCO”), p. 9.

¹⁰ *Id.*

determining whether or not a particular community is ‘served’ by broadband.”¹¹ If broadband services are not affordable by community standards, then the community does not truly have access.

NPM and NCAI agree with AT&T that measuring affordability must take into account the “range of ways that broadband is made available in different communities.”¹² However, NPM and NCAI do not agree that a Tribal community has affordable access simply because there are several services available, especially if those services are only cost-effective for anchor institutions. Affordability must be evaluated from the perspective of the consumer to ensure that this important benchmark is being met.

However, affordability must not only be considered from the perspective of the end-user, but also from the perspective of local and Tribal governments seeking to provide broadband services. NPM and NCAI agree with the American Cable Association’s (“ACA”) position that “[t]o efficiently and effectively provide affordable broadband Internet access to small markets and rural areas, broadband providers (i) must have affirmative, nondiscriminatory rights of access to ‘middle mile’ infrastructure at (ii) reasonable and nondiscriminatory special access rates, terms, and conditions.”¹³ In many cases, providing affordable access on Tribal lands will begin with providing affordable access to the infrastructure to Tribal companies seeking to provide broadband services.

Although NPM and NCAI appreciate Qwest’s willingness to begin a pilot program to address the lack of broadband services in rural and Tribal areas,¹⁴ NPM and NCAI believe that

¹¹ National Association of Telecommunications Officers and Advisors (“NATOA”), p. 11.

¹² AT&T, p. 25-26.

¹³ American Cable Association (“ACA”), p. 7.

¹⁴ Qwest, p. 15.

the Commission must make a concerted effort to hold service providers accountable for providing ubiquitous broadband coverage in Indian Country. While pilot programs may work for some communities, NPM and NCAI fear that such programs could be used as an alternative to deploying the ubiquitous coverage that Indian Country desperately needs.

III. MEASURING PROGRESS

The Commission sought comment on the best methods for evaluating the progress of broadband deployment. NPM and NCAI argue for several specific changes in this regard, all centered around utilizing local resources to provide more granular data about specific neighborhoods and communities. More granular data is essential to determining the current state of broadband deployment in Indian Country, as well as to measure the progress of deployment efforts.

NPM and NCAI argue that the Commission should abandon the zip code and census tract methods of defining where broadband service exists. To that end, NPM and NCAI disagree with Qwest's position that under the current reporting systems "there is more than sufficient information to identify unserved areas," and that the Commission should adhere to the census tract approach.¹⁵ NPM and NCAI also disagree with OPASTCO's assertion that "the FCC's existing reporting requirements, combined with other data produced by states and other federal agencies, as well as data mined from other publicly available sources, will provide it with a sufficiently detailed and accurate picture of broadband deployment and subscribership in areas served by rural ILECs," and that imposing additional reporting requirements "would place burdens on them that far outweigh the usefulness of any additional data collected."¹⁶

¹⁵ Qwest, p. 8, 10.

¹⁶ OPASTCO, p. 43.

NPM and NCAI believe, and federal reports verify, that the data regarding broadband deployment on Tribal lands is grossly inadequate.¹⁷ NPM and NCAI agree with Connected Nation’s argument that “[p]lenty of evidence exists to justify why Congress called for household level mapping” because this method “is the only way to truly understand where the broadband gaps exist, particularly in rural areas.”¹⁸ NPM also agrees with their statement that “[i]f broadband mapping is done at any higher level – at a geographic unit level such as used by the Census Bureau or the US Postal Service – the result will be a severe overestimation of broadband deployment across the United States.”¹⁹ Indian Country is uniquely situated due to its expansive rural and remote communities, some of which still utilize dirt roads without street addresses. Further, Tribal lands with their status as federal enclaves have additional federal and Tribal land rights and responsibilities. Therefore, NPM and NCAI recommend that the mapping of Indian Country be given particularized inquiry with specific government-to-government attention that would meet the standards of the FCC Tribal Policy Statement; and that field-based technologies be employed as the most effective method to measure the progress of broadband deployment. Similarly, NPM and NCAI concur with NATOA that the Commission should utilize “GIS-style data collection and mapping to provide accurate information on current last mile and middle mile deployments so that policymakers can base decisions on as complete a picture as possible.”²⁰ Only through these more granular mapping solutions can the Commission fully understand the poor penetration rate of broadband services currently on Tribal lands. NPM and NCAI believe

¹⁷ See U.S. Government Accountability Office, *Challenges to Assessing and Improving Telecommunications for Native Americans on Tribal Lands*, GAO-06-189 (Jan. 2006) (acknowledging a lack of information about subscribership to Internet access services by households on Tribal lands because the information is untracked by any federal survey).

¹⁸ Connected Nation, p. 10.

¹⁹ *Id.*

²⁰ NATOA, p. 56.

that whatever method chosen for collecting this data should utilize the resources available within Indian Country. Therefore, NPM and NCAI agree with Google that “the Plan should acknowledge the expertise of individual consumers and grassroots groups” that “are likely to have timely and accurate input, including regarding impediments to universal broadband access, making participation in ongoing data collection efforts valuable.”²¹

NPM and NCAI believe that this is especially true on Tribal lands, where Tribal governments and Native American grassroots groups must play a vital role if accurate and reliable data is going to be collected. Tribes uniquely know the market conditions and are intimately familiar with the challenges of broadband deployment on Tribal lands. Therefore, consultation by the Commission with Native Nations becomes even more critical because Tribes know where access exists (or, more importantly, where it does not exist).

IV. ACHIEVING DEPLOYMENT FOR ALL TRIBES

After defining the relevant terms and benchmarks, the Commission must act quickly and efficiently in deploying broadband capabilities on Tribal lands. To achieve that goal, NPM and NCAI advocate for the prioritization of unserved and underserved communities. To implement these priorities, NPM and NCAI urge the Commission to consider using existing technologies, which have great potential to provide the needed access in Indian Country.

A. Prioritizing Underserved

NPM and NCAI support the Commission’s interest in prioritizing broadband deployment to unserved and underserved areas of the country. The vast majority of Indian Country is unserved by any form of broadband or telecommunications service. As a result, Commission policies emphasizing deployment in these areas will drastically improve service on Tribal Lands.

²¹ Google, p. 10-11.

NPM and NCAI agree with the Minority Media Telecom Council (“MMTC”) that “the highest priority both for broadband stimulus funding and for the Commission’s broadband plan should be dedicated to unserved and underserved populations,”²² especially targeting “the most needy and structurally underserved population: low-income minority consumers.”²³ MMTC’s structural argument resonates with politically classified indigenous nations because of extreme middle-mile and last-mile challenges due to the remoteness of service that create significant market challenges. Such priorities would greatly benefit Native Nations who to date have been left behind by the traditional market model.

B. The Use of Existing Technologies

NPM and NCAI believe that many of the existing broadband technologies can provide affordable access on Tribal lands. NPM and NCAI advocate for the expanded use of existing technologies, such as available spectrum, dark fiber, and satellite technology, to provide Indian Country with much needed access to broadband capabilities.

1. Spectrum

NPM and NCAI firmly believe a thorough review of commercial and government spectrum holdings is essential to identify bands that could be opened for use specifically on Tribal lands. The New America foundation concurs, and “believe[s] that rural areas will be the most likely beneficiaries of a mapping of the U.S. spectrum capabilities.”²⁴ Additionally, NPM and NCAI agree that “[i]t will quickly become clear that particular frequency bands are either

²² Minority Media Telecom Council (“MMTC”), p. iii.

²³ MMTC, p. 11.

²⁴ New America, p. 21.

completely unused or grossly underutilized in particular rural markets” that would allow the Commission “to open these frequencies for non-interfering use by rural broadband providers.”²⁵

Once this study is complete, NPM and NCAI recommend that the Commission make more spectrum available for broadband deployment. NPM and NCAI agree with NATOA that “[e]xperience shows, and empirical data demonstrate, that unlicensed spectrum gives consumers, communities, nonprofits, entrepreneurs, and small businesses a range of opportunities – and the attendant innovation, economies of scale, and access – that are otherwise not available because of both the unavailability of spectrum and the extremely high cost of getting access to licensed spectrum.”

NPM and NCAI concur that allocating additional spectrum “provides a mechanism for extending the last-mile of wireless services into rural communities, increasing the supply of broadband into rural communities and fostering increased demand for broadband capacity.”²⁶ Although making more spectrum available for broadband deployment would significantly improve access on Tribal lands, NPM and NCAI urge the Commission to reserve white spaces spectrum for multiple ubiquitous Tribal priorities including noncommercial radio stations serving Tribal communities, given their important role national security and information dissemination in Indian Country. Therefore, although the deployment of fiber infrastructure should be the clear priority for Tribal lands, NPM believes that the utilization of white spaces and wireless spectrum, if necessary, would enhance the range of possible broadband services.

²⁵ *Id.*

²⁶ *See* NRECA, p. 12.

2. Fiber

NPM and NCAI strongly advocate for the use of dark fiber to deploy broadband on Tribal lands, especially where public-private partnerships with local Tribal governments could be used to provide the service. NPM and NCAI agree with the New America Foundation’s proposal of “a plan to fund and mandate the installation fiber-optic conduits and dark fiber bundles along all federally-subsidized and direct federal highway projects” and integrating “the build-out of neutral fiber-optic infrastructure into public investment in the smart grid – taking advantage of the efficiency of using a single infrastructure to facilitate connectivity for a multiplicity of services and applications.”²⁷ NPM and NCAI also agree with New America that the Commission should emphasize bringing these high-capacity fiber connections to community anchors, which could further serve as “interconnection hubs, providing co-location space for broadband providers in the community.”²⁸ Such a project, if utilized in connection with Tribal public-private partnerships, would greatly increase broadband access on Tribal lands.

3. Satellite

NPM and NCAI believe that, due to their ubiquitous coverage capabilities in remote and rural communities, satellite services hold great potential for bringing broadband access to Indian Country where fiber may not be possible. Therefore, NPM and NCAI agree with the National Rural Telecommunications Cooperative that “wireless broadband technology is the least expensive and most technologically advanced platform for bringing broadband service to rural and remote areas.”²⁹

²⁷ New America, p. ii.

²⁸ New America, p. 6.

²⁹ NRECA, p. 10.

Although satellite services possess great promise, to-date the market model has seen very limited success in delivering a viable product, and only in the most remote and rural parts of Indian Country. NPM and NCAI agree with NATOA that policymakers erroneously “relied on the unproven theory that developments in broadband over power lines, satellite, and wireless technologies would usher in a new era of competition that would spur private investment and that what was thus needed was a hands-off approach so that the magic hand of the market could take over, and that robust competition would ensure coverage to all areas.”³⁰ Currently, satellite services in Indian Country suffer from restrictive download caps, slow transmission speeds, are prohibitively expensive, and have high latency issues. Therefore, if satellite service is the best method to provide broadband access to Indian Country, the technology must improve so that Tribal residents are afforded the same broadband functionality as urban consumers.

C. Public-Private Partnerships

In the context of a Tribal-centric approach, NPM and NCAI believe that public-private partnerships that includes the trust partnership of the federal government can assist unique market approaches at all levels of broadband deployment on Tribal lands. NPM and NCAI advocate for the use of Tribally-centric public-private partnerships on Tribal lands in all phases of broadband deployment, including, but not limited to, obtaining the necessary detailed mapping information, building the necessary infrastructure to provide broadband access, and providing the broadband service to Tribal customers. NPM and NCAI agree with Connected Nation’s position that “[r]esearch has shown that public-private partnerships that incorporate the insight of community-based leadership have been successful at bridging the ‘digital divide’

³⁰ NATOA, p. 18.

among those who do not subscribe to home broadband service.”³¹ Therefore, NPM and NCAI also agree that it is “impractical, unreasonable, and redundant to expect the FCC or any other federal agency to develop household level broadband maps without the support of public-private partnerships working on the ground with consumers and broadband providers to understand exactly where broadband is offered and where it is not.”³² Public-private partnerships that are sustainable and with lasting backbone development must play a vital role in deploying broadband to unserved and underserved areas, especially on Tribal lands.³³

D. Universal Service Fund

NPM and NCAI advocate for changes in the Universal Service Fund to assist in deploying broadband services on Tribal lands under a separate program for Indian Country. NPM and NCAI believe where Tribes invest their own money and resources, those networks become “trust” assets and should be recognized in the regulatory and fiduciary obligation of the federal trust responsibility to Native Nations. NPM and NCAI agree with the National Telecommunications Cooperative Association (“NTCA”) that “broadband access to the Internet should be added to the list of supported services eligible to receive support from High-Cost and Low-Income USF programs.”³⁴ To implement this goal, NPM and NCAI agree with NATOA that “the Commission should also require broadband service providers to contribute to the Universal Service Fund” because this “will ensure that adequate resources exist to fund

³¹ Connected Nation, p. 11.

³² Connected Nation, p. 26.

³³ The Commission should consider funding certain nonprofit organizations, especially on Tribal lands, that have the expertise to provide these vital services, but lack the long-term funding necessary for sustainability.

³⁴ National Telecommunications Cooperative Association (“NTCA”), p. 15.

deployments in high-cost areas, while also making funding available for programs similar to Lifeline and Link Up should such an approach be adopted.”³⁵

In extending USF support to broadband services, however, NPM and NCAI advocate for the Commission to create a new, separate program to facilitate broadband deployment. NPM and NCAI agree with the ACA that placing broadband into the current telephony system would “add another layer of complexity to the already complicated issue” of USF support for basic telephone service.³⁶ Due to the poor penetration rate of basic telephone service on Tribal lands, NPM and NCAI urge the Commission to create “a separate program with its own rules on funding and eligibility” in an effort to do no harm to the existing USF support for telephone service.³⁷ Finally, NPM and NCAI caution that the USF support for broadband should not support private market models that have historically failed Indian Country.

E. Digital Literacy Training

NPM and NCAI argue that the Commission cannot create a national broadband plan without emphasizing digital literacy training for areas currently unserved or underserved. Similar to the transition to digital television, the Commission must provide consumers with a better understanding of how to effectively utilize these new capabilities. NATOA agrees, as they “urge that the Commission’s plan recognize the need not only for network deployment but also for efforts to increase consumer interest and literacy among those for whom broadband is unfamiliar, discomfoting, or irrelevant.”³⁸

³⁵ NATOA, p. 22.

³⁶ ACA, p. 13.

³⁷ ACA, p. 13.

³⁸ See NATOA, p. 12.

To achieve this goal, the NPM and NCAI agree with the MMTC that the Commission should utilize “already existing networks of local and national nonprofit organizations that are engaged with the communities in which they operate and have expertise with creating culturally specific niche content.”³⁹ NPM and NCAI believe that relying on such programs will be the most effective method of enhancing digital literacy on Tribal lands, and maximizing the potential of broadband access in Indian Country. Within Indian Country, the associations best equipped to perform this function would be Tribal governments, Tribal nonprofits, and other local community anchor institutions.

V. IMPACT OF BROADBAND ACCESS

NPM and NCAI believe that access to broadband services would dramatically improve the quality of life on Tribal lands. NPM and NCAI agree with Rural Broadband Strategies that “[b]roadband access would allow rural America to reap the benefits of telehealth, telecommuting, higher education distance learning, improved emergency communications systems, and greater connection to the global economy.”⁴⁰ The MMTC also recognizes that broadband access “has become increasingly central to accessing the broad array of bandwidth-intensive utilities that can improve quality of life in the areas of healthcare, education, environment, economic development, employment, energy efficiency, community building, communications, public safety and civic participation.”⁴¹

NPM and NCAI also believe that access to affordable broadband services on Tribal lands will foster greater civic participation among Native Americans. Broadband access has become essential to participation in modern democracy, therefore NPM understands the MMTC’s

³⁹ MMTC, p. 26.

⁴⁰ Rural Strategies Broadband p. 11; *see also* NATOA, p. 4; Rural Strategies, p. 24.

⁴¹ MMTC, p. 1.

concern “that broadband adoption in rural, low income, multilingual and predominantly minority communities lags behind adoption rates of other communities.”⁴² Furthermore, given the rural nature of most Tribal lands, NPM and NCAI agree with NATOA that utilizing broadband tools will allow Tribal governments to “engage with their citizens and make government more transparent” by allowing Tribal governments to “reach out to residents who may not otherwise be able to attend a community meeting and voice their opinion.”⁴³ Utilizing broadband access to foster civic participation on Tribal lands will allow Tribal leaders to make more informed decisions, and permit Tribal members to participate in the national political discussion.

Broadband access on Tribal lands also has the potential to greatly increase the educational opportunities for Tribal members. NPM and NCAI agree with the New America Foundation that “a key goal of the national broadband plan should be to deploy high-capacity fiber into every community with points-of-presence (“POPs”) at community anchor institutions including every school (K-12, community colleges, and universities), library, hospital, as well as municipal/county buildings, public housing complexes and public safety operations that local jurisdictions want to include on the public fiber network.”⁴⁴ As previously discussed, the most effective way to achieve this goal on Tribal lands is to use Tribally-centric, public-private partnerships, with the ideal solution involving the creation of a publicly-subsidized fiber infrastructure that these partnerships could use as the foundation for broadband build-outs.⁴⁵

⁴² MMTC, p. 1.

⁴³ NATOA, p. 62.

⁴⁴ New America, p. 6.

⁴⁵ *See also* New America, p. 6.

VI. CONCLUSION

Commentators universally agree that broadband access has the potential to dramatically improve the quality of life for many Americans. NPM and NCAI believe that this is especially true for Native Americans and those who reside on Tribal lands. NPM and NCAI continue to believe that, by prioritizing local Tribal ownership and Tribal-centric operation, as well as enforcing well-articulated standards focused on actual performance, this plan can make great strides in providing Indian Country the broadband access it so desperately needs.

Respectfully submitted,

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