

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
)	
Lifeline and Link Up)	WC Docket No. 03-109

COMMENTS OF SMITH BAGLEY, INC.

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August 26, 2011

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SUMMARY

Smith Bagley, Inc. (“SBI”) operates a commercial mobile wireless network in the “Four Corners” area of Arizona, New Mexico, Utah and Colorado. SBI has built extensive wireless coverage, and it currently provides service to over 100,000 people, 56,000 of whom live in low-income households on the Navajo, Hopi, White Mountain Apache, Zuni and Ramah Navajo Tribal lands.

The challenges to improving telephone penetration on tribal lands are significant and ongoing. Furthermore, low-income citizens on tribal lands need mobile communications as much, if not more, than citizens living in other parts of the United States. To meet these challenges, it is imperative that the Commission adopt Lifeline and Link Up eligibility rules and programs that enable low-income tribal families to qualify for, and take full advantage of, the Commission’s Lifeline assistance program. SBI urges the Commission to adopt special provisions for low-income residents of tribal lands, in order to increase the opportunities for health, safety, education, and economic development.

The Commission should adopt a “one per adult” rule for tribal households where income is below the poverty line. A “one per residence” rule for access to basic voice service would likely have the unintended effect of denying many tribal residents adequate access to telecommunications services. Many low-income tribal households require more than one basic voice connection to the telecommunications network. When one person leaves the home carrying a mobile phone, which is vitally needed when traveling in remote areas, those remaining at home still require the ability to communicate.

If the Commission does apply a “one per household” restriction to the eligibility for Lifeline, it is imperative that the term “household” be defined in a way that is not dependent on a

unique mailing address of a particular subscriber. This is particularly important for tribal areas. If the Commission adopts either the Census or LIHEAP definition of a household, it should be careful to ensure that the one per household rule does not unreasonably limit access to telephone service in the case of residences (referred to as “hogans”) used by many Navajo families. If the Commission adopts one of these definitions, it should clarify that each separate nuclear family residing in the hogan is eligible for Lifeline assistance (if all other qualifying criteria are met).

SBI supports the creation of a centralized database of eligible consumers. SBI opposes any Commission rule that would require tribal carriers to implement the same procedures used by TracFone Wireless to comply with the one per household limitation.

SBI supports the Commission’s proposal to define Link Up as “the ordinary initiation charge that an ETC routinely imposes on all customers within a state.” Beyond establishing this definition, the Commission should decline to alter the current levels of Link Up support.

Eligibility for participation in the broadband pilot program should be based on the very same criteria that the Commission currently uses to determine eligibility for existing Lifeline and Link Up programs. For now, it is critical that the Commission focus on ensuring that as many customers as possible that meet current eligibility requirements are actually receiving Lifeline discounts – for basic voice services as well as broadband services. SBI supports NARUC’s recommendation that Lifeline broadband pilot program participants should not be required to change providers or to take bundled voice and broadband services. Furthermore, participants should not be discouraged nor disallowed from receiving their voice service and the Lifeline discount from one carrier and their broadband service and the broadband discount from another carrier.

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COMMENTS OF SMITH BAGLEY, INC.

Smith Bagley, Inc. (“SBI”), by its counsel, hereby submits these Comments in response to the Further Inquiry issued by the Federal Communication Commission (“FCC” or “Commission”) on August 5, 2011 in the above-captioned Lifeline and Link Up proceeding.¹

I. INTRODUCTION AND SUMMARY.

The challenges to improving telephone penetration on tribal lands are significant and ongoing. To meet these challenges, it is imperative that the Commission adopt Lifeline and Link Up eligibility rules and programs that enable low-income tribal families to qualify for, and take full advantage of, the Commission’s Lifeline assistance program. SBI urges the Commission to adopt special provisions, as set forth below and in its initial Comments,² for low-income

¹ *Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding*, Public Notice, WC Docket Nos. 11-42, 03-109; CC Docket No. 96-45 (rel. Aug. 5, 2011)(“*Further Inquiry*”).

² Comments of Smith Bagley, Inc., filed April 21, 2011 (“Comments”).

residents of tribal lands, in order to increase the opportunities for health, safety, education, and economic development. As a general matter, according to the National Congress of American Indians (“NCAI”), “the reality is that Indian reservations have . . . the highest poverty rate of any ethnic grouping in America. . . . [T]he vast majority of tribes continue to be mired in a severe economic depression caused by decades of marginalization.”³ The Commission must take into account the unique, and extreme, poverty of many tribal land residents in formulating its new rules for the Lifeline assistance program.

A. SBI’s Network.

SBI operates a commercial mobile wireless network in the “Four Corners” area of Arizona, New Mexico, Utah and Colorado. SBI has built extensive wireless coverage, providing service to over 100,000 people, 56,000 of whom live in low-income households on the Navajo, Hopi, White Mountain Apache, Zuni and Ramah Navajo Tribal lands.

B. Tribal Land Customers.

Low-income citizens on tribal lands need mobile communications as much, if not more, than citizens living in other parts of the United States. Tribal residents often travel long distances to go to school or work, to purchase basic necessities, and even to get their mail, which they must pick up at the post office. Many tribal residents move around the reservation with the seasons, or to follow sometimes transient job opportunities. In some cases, the mobile telephone is the only communications device available, and in all cases it is a true “lifeline” when a person leaves home. Oftentimes, a person is located many miles from the nearest home or business with

³ NCAI, Economic Development, accessed at http://www.ncai.org/Economic_Development.45.0.html, cited in SBI, Petition for Rulemaking Regarding the Expansion of Support Available Pursuant to the Fourth Tier of the Universal Service Lifeline Program, RM-11529, filed Mar. 27, 2009 (“SBI Petition”).

a landline facility. In such places, when an emergency arises, a mobile phone is almost always the only option.

To provide some perspective, according to the American Community Survey 2005-2009⁴, the median household income in the Navajo Nation was \$26,894⁵ compared to the estimated median family household income nationwide which was \$51,425.⁶ The per capita income in the Navajo Nation was \$10,624.⁷ According to the Census Bureau, the U.S. per capita income in 2009 was \$39,138.⁸ For 2009, the United States considers a family of four to be at the poverty level when their family income is below \$21,954.⁹ Estimates put the average number of Navajo families that fell below the poverty line in the prior 12 months at 31.5%¹⁰ compared to 9.9% of all United States families.¹¹

⁴ Income and poverty data from the 2010 Census were not available at the time of this writing.

⁵ Source: http://factfinder.census.gov/servlet/ADPTable?_bm=y&-geo_id=25200US2430R&-qr_name=ACS_2009_5YR_G00_DP5YR3&-context=adp&-ds_name=&-tree_id=5309&-_lang=en&-redoLog=false&-format= (then follow “Economic” hyperlink).

⁶ Source: http://factfinder.census.gov/servlet/STTable?_bm=y&-geo_id=01000US&-qr_name=ACS_2009_5YR_G00_S1903&-ds_name=ACS_2009_5YR_G00_&-_lang=en&-redoLog=false&-CONTEXT=st.

⁷ Source: http://factfinder.census.gov/servlet/ADPTable?_bm=y&-geo_id=25200US2430R&-qr_name=ACS_2009_5YR_G00_DP5YR3&-context=adp&-ds_name=&-tree_id=5309&-_lang=en&-redoLog=false&-format=.

⁸ <http://www.census.gov/compendia/statab/2011/tables/11s0680.pdf>.

⁹ Source: <http://www.census.gov/hhes/www/poverty/data/threshld/thresh09.html>.

¹⁰ Source: http://factfinder.census.gov/servlet/ADPTable?_bm=y&-geo_id=25200US2430R&-qr_name=ACS_2009_5YR_G00_DP5YR3&-context=adp&-ds_name=&-tree_id=5309&-_lang=en&-redoLog=false&-format= (then follow “Economic” hyperlink).

¹¹ Source: http://factfinder.census.gov/servlet/ADPTable?_bm=y&-context=adp&-qr_name=ACS_2009_5YR_G00_DP5YR3&-ds_name=&-gc_url=null&-tree_id=5309&-redoLog=false&-geo_id=01000US&-format=&-_lang=en.

With respect to telephone subscribership, SBI has previously observed that, according to 2000 Census figures, even the more populous Indian reservations had telephone subscribership levels significantly below the national average. Based on the 2000 census:

Nine of [the] 25 [most populous] tribal lands, representing about 44 percent of Native American households on tribal lands in the lower 48 states, had telephone subscribership rates at a level below 78 percent—which is about what the national rate was *over 40 years ago* when the 1960 decennial census was taken. *The subscribership rate for the most populous tribal land—the Navajo—was only 38 percent.*¹²

Broadband subscribership (and availability) on tribal lands is much lower even than telephone subscribership. According to the Commission:

Americans living on Tribal lands ... usually lack broadband access and many lack even basic telephone service. ... Moreover, while there is no solid data on broadband deployment on Tribal lands, availability is estimated at less than ten percent.¹³

SBI provides its comments on the Commission's Further Inquiry below.

II. ONE PER RESIDENCE LIMITATION.

A. The Commission Should Adopt a “One Per Adult” Rule in Tribal Households Where Income is Below the Poverty Line.

In its NPRM, the Commission proposed to codify a rule that would allow eligible low-income consumers to receive only one Lifeline and Link Up discount per residential address. In its Comments, SBI emphasized that a “one per residence” rule for access to basic voice service would likely have the unintended effect of denying many tribal residents adequate access to

¹² GAO, Report to Congressional Requesters, “Challenges to Assessing and Improving Telecommunications for Native Americans on Tribal Lands,” GAO-06-189, rel. Jan. 2006 at 13 (emphasis added), *cited in SBI Petition* at 9-10. While SBI expressed the belief that subscribership on Navajo lands has substantially increased since the 2000 Census (in part because of SBI's efforts to enroll Lifeline-eligible subscribers), it noted that Navajo subscribership likely remains well below the national average of 94.6 percent reflected in the most recent American Community Survey figures. *SBI Petition* at 10.

¹³ *Improving Communications Services for Native Nations*, WT Docket No. 11-41, Notice of Inquiry, 26 FCC Rcd 2672 (2011) at para. 1 (internal footnotes omitted).

telecommunications services. In SBI's experience, the overwhelming factor preventing residents of tribal lands from accessing telephone service is poverty – the inability to afford even a single telephone line.

Many low-income tribal households require more than one basic voice connection to the telecommunications network. When one person leaves the home carrying a mobile phone, which is vitally needed when traveling in remote areas, those remaining at home still require the ability to communicate.¹⁴ Accordingly, SBI urges the Commission to adopt a special Tier 4 program for low-income residents of tribal lands. For those tribal residents who can demonstrate income at or below the federal poverty level, the Lifeline program should provide one Tier 4 credit per adult for basic voice service. As SBI noted in its Comments, this proposed qualification standard is more stringent than the standard used today for the first line, which is currently 135% of the federal poverty guideline. Tribal residents who are above the poverty line would still be limited to one Lifeline benefit per household.

B. Defining “Household” or “Residence”.

The Commission has requested further comment on the threshold issue of “whether a one-per-household or one-per-family rule would provide an administratively feasible approach to providing Lifeline/Link Up support” As stated above, SBI urges the Commission not to apply a “one per household” or “one per residence” rule to the eligibility for Lifeline basic voice services for residents of tribal lands who are at or below the federal poverty line.

¹⁴ In a recently released Pew survey, 40% of cell phone owners said they had found themselves in an emergency situation in which having their phone with them helped. “Americans and Their Cell Phones,” Pew Internet & American Life Project (Aug. 15, 2011), available online at <http://pewinternet.org/Reports/2011/Cell-Phones.aspx>.

If the Commission does apply a “one per household” restriction to the eligibility for Lifeline, it is imperative that the term “household” be defined in a way that is not dependent on a unique mailing address of a particular subscriber. This is particularly important for tribal areas. SBI supports the use of the Census Bureau definition, which defines household as all of the persons occupying a housing unit consisting of separate living quarters. Alternatively, the Commission could use the LIHEAP definition of “household” as “any individual or group of individuals who are living together as one economic unit.”

If the Commission adopts either the Census or LIHEAP definition of a household, it should be careful to ensure that the one per household rule does not unreasonably limit access to telephone service in the case of residences (referred to as “hogans”) used by many Navajo families. If the Commission adopts one of these definitions, it should clarify that each separate nuclear family residing in the hogan is eligible for Lifeline assistance (if all other qualifying criteria are met).

Either the Census or LIHEAP definition of “household” is more administratively workable than one that is based on a postal address. Defining “household” based on one’s postal address would have the effect of disqualifying many qualified individuals who are in separate households that have the same postal address. This situation is very common in tribal areas, where individual housing units often lack house numbers or any postal address at all. Many parts of tribal lands SBI serves are beyond the U.S. Postal service addressing system and in the case of the Navajo Nation, they are actively working to develop a complete addressing system, but as of this past spring, they had only completed 10 of 110 chapters.¹⁵

¹⁵ See Letter from Arbin Mitchell, Division of Community Development, Navajo Nation, to Mr. Geoffrey Blackwell, Office of Native American Affairs, FCC, dated March 17, 2011 (attached hereto as Exhibit 1).

SBI supports the creation of a centralized database of eligible consumers, as is currently done in some states. With automatic enrollment and centralized administration, a definition of household that is based on the Census definition – or a similar definition used by another government program – would be simple to administer. For example, if AT&T’s PIN-based system of centralized administration is adopted, a unique numerical identifier would be assigned to each qualifying consumer by the state agency that is selected to administer Lifeline.¹⁶ The consumer could then use the PIN to obtain Lifeline service from the ETC of his or her choice. USAC, or another entity selected to administer the database, would determine whether a Lifeline discount is already being provided to the same household.

C. Administering a “One per Household” Eligibility Rule.

SBI opposes any Commission rule that would require tribal carriers to implement the same procedures used by TracFone Wireless to comply with the one per household limitation.¹⁷ Each company should be allowed to develop its own processes based on its cost structure and operational strengths and weaknesses – so long as such processes ensure compliance with the Commission’s rules. Such an approach enhances efficiency and reduces costs.

Moreover, centralized administration would render unnecessary the burdensome and costly procedures proposed by TracFone for verifying the eligibility of Lifeline applicants. With centralized administration, USAC, or another entity selected to maintain and administer the database, would be a more appropriate entity to obtain information from consumers and group living facilities. The database administrator would determine whether an individual applicant is

¹⁶ See AT&T Comments at 11-15 (filed April 21, 2011).

¹⁷ See Letter from Mitchell F. Brecher, Greenberg Traurig, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 03-109, 11-42, CC Docket No. 96-45 (filed June 1, 2011).

in a household that already receives Lifeline service. Individual carriers would not need to perform these often duplicative and overlapping inquiries.

In the absence of centralized administration – and perhaps during the interim period during which the national database is being created and state agencies are being selected and prepared for their role in centralized administration – ETCs should be permitted to utilize reasonable procedures to eliminate duplicate Lifeline subsidies. Should USAC or any other administrator of the Lifeline program desire to request the FCC’s written guidance on any specific aspect of a particular carrier’s processes, USAC or the Administrator could do so and the FCC could provide guidance with input from carriers. Such an approach will reduce “regulatory lag”.

III. POTENTIAL RESTRICTIONS ON LINK-UP

A. Sprint’s Comments Regarding Declining Cost of Initiating Service.

SBI supports the Commission’s proposal to define Link Up as “the ordinary initiation charge that an ETC routinely imposes on all customers within a state.”¹⁸ Beyond establishing this definition, the Commission should decline to alter the current levels of Link Up support.

Sprint – which has primarily focused on receiving high-cost support and has historically demonstrated scant participation in the Low Income program¹⁹ – offers no justification for its proposal other than to make the conclusory statement that “the ever-increasing level of automation has reduced the cost of initiating service[.]”²⁰ Sprint offers no evidence in support of

¹⁸ *Lifeline NPRM* at ¶ 73 (to be codified at 47 CFR § 54.400(e)).

¹⁹ See Universal Service Administrative Company, Low Income Appendix LI05 - Annual Low Income Support Amounts, 2008 through 1Q2011, available at <http://www.usac.org/about/governance/fcc-filings/2011/quarter-4.aspx>.

²⁰ Sprint Comments at 9.

this statement, nor does it explain how a purported *reduction* in cost could justify the *elimination* of Link Up altogether. In fact, companies charge service activation fees because they continue to incur significant costs during the process of initiating service.

B. Limiting Reimbursement to “Costs Actually Incurred”.

The Further Inquiry seeks comment on whether Link Up should be limited to “service initiations that involve the physical installation of facilities by the provider at the consumer’s residence.”²¹ SBI strongly opposes any such limitation on Link Up support. Limiting the Link Up discount for service installations that involve physical installations is a wireline-centric proposal that would violate the fundamental principle of competitive and technological neutrality. Reducing Link-up support makes it more likely that carriers will pass costs along to low-income consumers, who can least afford service initiation charges.

IV. BROADBAND PILOT PROGRAM

A. Consumer Eligibility for Pilot Program.

Eligibility for participation in the broadband pilot program should be based on the very same criteria that the Commission currently uses to determine eligibility for existing Lifeline and Link Up programs. For now, it is critical that the Commission focus on ensuring that as many customers as possible that meet current eligibility requirements are actually receiving Lifeline discounts – for basic voice services as well as broadband services. In addition, using the existing criteria will simplify administration – and likely accelerate implementation -- of a pilot program. Simply put, any household which is currently eligible for Lifeline service should automatically be eligible to participate in the new broadband pilot program. Further, to ensure uniformity and

²¹ *Further Inquiry* at 6.

consistency in a pilot, there should be a nationwide standard governing the list of eligible programs and income thresholds.

After the objective of maximizing Lifeline participation by eligible customers has been achieved, SBI supports an expansion of eligibility for *all* Lifeline and Link Up programs. SBI agrees with the Benton Foundation that more permissive eligibility requirements are needed than those provided under the current rules. SBI supports the Joint Board's recommendation to raise the income threshold from 135% to 150% of the Federal Poverty Guidelines. Under this threshold, the qualifying income level for a family of four or five would be \$40,000. SBI believes that this more permissive income level, as well as a minimum list of qualifying programs and services, should be mandated uniformly in all states.²²

B. Barriers to Consumer Participation in Pilot Programs.

SBI supports NARUC's recommendation that Lifeline broadband pilot program participants should not be required to change providers or to take bundled voice and broadband services. Furthermore, participants should not be discouraged nor disallowed from receiving their voice service and the Lifeline discount from one carrier and their broadband service and the broadband discount from another carrier. Indeed, a carrier providing voice Lifeline in a given area might not even have the ability to provide broadband. Lifeline customers should not be precluded from choice in the marketplace simply because they lack resources. If one eligible carrier has a superior voice offering and another a superior broadband offering in a given area, Lifeline customers should be afforded the same choice as non-Lifeline customers.

²² While states should have the ability to add qualifying programs and services that would allow residents to qualify for Lifeline and Link Up, no state should be permitted to exclude programs and services that, at the federal level, would qualify one for Lifeline and Link Up.

In today's free market, consumers are able to choose their service providers -- and if they wish to take voice service from one company and broadband service from a different company, they are free to do so. The broadband pilot program should reflect this marketplace reality.

V. CONCLUSION

The Commission should take the actions set forth above so as to best meet the difficult, but exceedingly important challenge of increasing telephone and broadband penetration for low-income tribal families.

Respectfully submitted,

SMITH BAGLEY, INC.



By: _____

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August 26, 2011

EXHIBIT 1:

**Letter from Arbin Mitchell, Division Director, The Navajo Nation
to Geoffrey Blackwell, Office of Native American Affairs, FCC**



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March 17, 2011

Mr. Geoffrey Blackwell
Consumers and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street, S. W.
Washington, D.C. 20554

RE: NAVAJO NATION RURAL ADDRESSING

Dear Sir:

The Navajo Nation is a Native American-governed territory covering 26,000 square miles of mostly rural and remote parts of northeastern Arizona, southeastern Utah, and northwestern New Mexico. This represents the largest land area assigned primarily to a Native American jurisdiction within the United States. The most recent available census date (2004) reported 173,987 Navajo citizens (58% of all Navajos) living on the Navajo Nation's territory, reflecting a density of about 7 persons per square mile.

I am writing to provide you with some general background on the Navajo Nation's ongoing efforts to establish a jurisdiction-wide uniform system of rural addressing for our citizens. Today, the Navajo Nation contains substantial areas where the United States Postal Services addressing system is not in place. That is, many Navajos live in areas with no formal address. They receive no services from the Postal Services in these areas. Mail is picked up at a post office box located at the nearest town with a post office. Often that town is many miles from home. The lack of formal addressing is made worse each year as the Navajo population continues to grow. Difficulties implementing the nation's 911 and E-911 systems pose a serious health and safety problem for Navajo citizens living in areas without formal addresses.

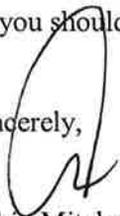
In 2008, to help address this problem and to support implementation of an effective E-911 system, the NNAA was established. The NNAA was intended to be a permanent organization that would institutionalize the processes needed to create a universal rural addressing system and to maintain and integrate the required databases to support E-911 deployment (Geographic Information System ("GIS") Master Street Addressing Guide ("MSAG"), for E-911).

In April 2009, the Navajo Nation formally adopted a plan to complete rural addressing over a three-year period. As part of this plan, NNAA has established relationships with all Navajo Nation Chapters. Each Chapter is responsible for identifying livable dwellings, labeling the type of dwelling, (Hogan, Trailer, Frame Built, etc.), and providing this information to the NNAA who, for every dwelling, is then responsible for mapping out and assigning an address and providing address signage.

The NNAA must also create street names for any road (dirt or other) with 4 or more dwellings on the road. While significant progress has been made toward completing this effort, the process is currently under-funded and so far only 10 out of 110 Chapters have provided NNAA the information it needs to complete the addressing plan. Nevertheless our efforts are continuing as we look forward to the benefits of better emergency response and improved services generally that will flow to our residents and communities when the plan is finally completed.

If you should have questions about NNAA's effort, I would be more than happy to talk with you further.

Sincerely,

A handwritten signature in black ink, appearing to be 'Arbin Mitchell', written over the word 'Sincerely,'.

Arbin Mitchell, Division Director
Division of Community Development
P. O Box 1905
Window Rock, Arizona 86515