

**BRISTOL BAY NATIVE ASSOCIATION**

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Received & Inspected

SEP 17 2012

FCC Mail Room

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Tribal Councils  
Served by BBNA:

- Aleknagik
- Chignik Bay
- Chignik Lagoon
- Chignik Lake
- Clarks Point
- Curyung
- Egegik
- Ekuk
- Ekwok
- Igiugig
- Iliamna
- Ivanof Bay
- Kanatak
- King Salmon
- Kokhanok
- Koliganek
- Levelock
- Manokotak
- Naknek
- New Stuyahok
- Newhalen
- Nondalton
- Pedro Bay
- Perryville
- Pilot Point
- Port Heiden
- Portage Creek
- South Naknek
- Togiak
- Twin Hills
- Ugashik

September 7, 2012

**Marlene H. Dortch, Secretary**  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, DC 20554

**Re: Petition for Waiver**  
Broadband Adoption Lifeline Pilot Program (WC Docket No. 11-42)  
Office of Native Affairs and Policy, Wireless Telecommunication Bureau, and  
Wireless Competition Bureau Issue Further Guidance on Tribal Government  
Engagement Obligation Provisions of the Connect America Fund (DA 12-1165)

Dear Ms. Dortch:

The Bristol Bay Native Association (BBNA) petitions the FCC for a waiver of the eligibility and deadline requirements of the Broadband Adoption Lifeline Pilot Program, as follows: 1) permit a Tribal Consortium, e.g. BBNA, to apply as an eligible entity independent of a utility, and 2), extend the time to submit a proposal to November 30, 2013.

Due to the unique conditions in rural Alaska, BBNA is exceptionally qualified to manage a pilot program to acquire and study data on potential Broadband Adoption Lifeline subscribers in the Bristol Bay Region, and delineate best practices to connect them successfully. BBNA is an Alaska Native regional non-profit corporation and a consortium of 31 federally recognized Tribes as defined by section 450b of Title 25 of the U.S. Code. The Bristol Bay Region covers an area about 46,573 square miles, roughly the size of the state of Ohio, which is native country to three major indigenous cultures - Yupiit, Athabascans, and Alutiiqs. Tribes compact with BBNA according to their need to provide services for their members in the areas of community services, social services, workforce development, Head Start, natural resources, land management, planning and program development, and transportation and infrastructure. BBNA is the

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second largest employer in the region with over 300+/- employees and an annual budget of about \$27 Million from Federal, State and private sources.

The Region is characterized by its abundance of natural resources, geographic isolation and pristine ecosystems, but also high unemployment, high energy costs, and high costs of living. Increasing fuel costs drive the costs of all products and services up and hinder the economy, reducing investments and the availability of jobs. The Alaska Native people are conflicted between the desires to honor cultural traditions while embracing modern life; an escalating cost of living is intensifying the need for innovative solutions for Alaska Natives seeking gainful employment and healthy lifestyles.

The commercial fishing industry is a multi-million dollar industry and the backbone of the economy. Most households in the Region are involved in commercial fishing in one form or another. A number of outside factors affect commercial fishing's value to the local economy, including international politics and economics; over capitalization coupled with high debt loads; farmed fish and fall in ex vessel value; rising operational costs; waning fish stocks and poor fish returns to the rivers and streams; interception on the high seas; and changing food choices in traditionally salmon consuming countries. These issues coupled with the restrictions in the Limited Entry Permit system have decreased the number of locally owned permits, which limits the number of local people able to participate and make a living in commercial fishing.

During the Bristol Bay Regional Vision Project nearly 1,400 people participated in a series of public meetings and many stated that a lack of opportunities was the major economic constraint. Rather than concentrating on the high costs, residents were more concerned with stimulating the economy to be able to pay for the things they need. Since few jobs are available, small business development is highly regarded as a viable option. People acknowledged that the main limitations to small business development is the lack of capital along with the high cost of energy, lack of infrastructure, long distances to markets, and lack of reliable, high speed broadband internet connectivity.

There is more and more demand for internet service in the Region. For over fifteen years the school systems have been training students on computer use with high speed internet connections. Adults are learning through post-secondary studies and on the job training. Most communities in Bristol Bay have access to the internet and cellular phone service with email and Wi-Fi connectivity. Internet is required for work and e-commerce, and there is a growing expectation that it is needed to carryout personal affairs like banking, purchasing, and communicating with family, friends, and work. People's ability to pay for internet service is not keeping up with demand.

A pilot program from BBNA would take a sampling of communities, negotiate with the service provider, connect low-income households, and subsidize the service through direct vendor payments. There are four service providers plus satellite internet services,

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and BBNA would take the opportunity to work with as many as possible to get an all-inclusive view of best practices in the Region.

Thank you for your consideration of this petition for waiver.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph Andersen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ralph Andersen  
President and Chief Executive Officer