

A Confederation of the Salish,
Pend d' Oreilles
and Kootenai Tribes

THE CONFEDERATED SALISH AND KOOTENAI TRIBES
OF THE FLATHEAD NATION

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A People of Vision

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March 3, 2014

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Jonathan Chambers
Federal Communications Commission
445 12th Street, SW 20024
Washington, DC

**Re: Expression of Interest – Rural Broadband Trials
Connect America Fund, WC Docket No. 10-90**

Dear Chairman Wheeler, Commissioners, and Mr. Chambers:

This letter is to express the Confederated Salish and Kootenai Tribes' interest in participating in the Rural Broadband Trials announced at the January 30th FCC Open Meeting. While we do not have a project to propose, we take this opportunity to document the Flathead Indian Reservation's need for affordable high-speed Internet service. We respectfully ask the Federal Communications Commission to consider our area's need when making decisions regarding the Rural Broadband Trials and any future initiatives related to the Connect America Fund.

Background

The Flathead Indian Reservation is the remaining homeland of the Confederated Salish and Kootenai Tribes—the Bitterroot Salish, the Pend d'Oreille and one band of Kootenai people. Our three unique tribes exist nowhere else in the world.

The Flathead Reservation is 1.3 million acres in size and is located in rural western Montana. Many Tribal members live in poverty, and the Confederated Salish and Kootenai Tribes (CSKT) are working to help these members find sustainable employment. Access to affordable, high-speed internet service is essential for those seeking to own their own businesses, or to contract work that they can do from their homes. Access to on-line training and other educational opportunities is critical for

many living in the most remote areas of the Reservation, due to high travel costs to attend college or other training.

Internet service here is currently provided by four separate telephone companies, a cable company and one small wireless company. Service areas overlap only slightly, resulting in a lack of competitive pricing. The remote, “frontier” areas have no internet service whatsoever. Our goal is to insure that all homes and businesses on the Reservation, especially those of our Tribal people, have access to affordable, dependable internet service.

Geographic Territory

The Flathead Reservation has diverse topography and geographic features. The Mission Mountains and Wilderness form the east boundary, with peaks as high as 10,000 feet. The Thompson Divide of the Cabinet Range forms the west boundary.

The Salish Mountains bisect the northern 2/3 of the Reservation into three valleys:

1. The wider Mission Valley lies on the east side of the Salish Mountains. This valley is bisected by U.S. Highway 93, which runs north and south through the Reservation, connecting several small towns along its route.
2. The “frontier-like” Little Bitterroot Valley lies in the northwest portion of the Reservation.
3. Camas Prairie is one of the least populated areas of the Reservation, and it lies just south of the Little Bitterroot Valley.

The southern portion of the Reservation consists of:

1. The Jocko Valley in the southeast, which is also bisected by U.S. Highway 93; and
2. The Ravalli/Dixon/Paradise area, a mountainous east-west corridor with development lying mainly along the Jocko and Flathead Rivers and Highway 200.

Homes in Camas Prairie, in the remote areas of the Bitterroot Valley, in portions of the Highway 200 corridor, as well as the more remote areas of the Mission and Jocko Valleys need to be connected. Where proximity to middle mile fiber is good, last mile fiber could potentially be hung on power poles, unless there is a cluster of homes with good line-of-sight for wireless transmission. CSKT manages the federally-owned power utility on the Reservation and easements may be easy to obtain. Partnerships with the local telephone companies could be developed in areas where fiber already exists.

Proposed Technology

CSKT would like to see speeds of 4 MB/second provided at an ideal maximum rate of \$25/month in addition to telephone land line costs.

Existing Providers

The southern portion of the Reservation is served by Blackfoot Telephone Company, whose internet service business rates for only 768 KB per second range from \$40-\$60/month, in addition to the approximate \$40/month basic fee to have a land-line

telephone. Internet rates for 1.5 MB/second range from \$65/month for a three-year contract, to \$85/month with no contract. This is not affordable for most Tribal families.

The mid-portion of the Mission Valley is served by Access Montana (formerly Ronan Telephone). Areas that can be served via line-of-sight can get 1 MB of download speed for \$25/month up to 4 MB for \$45—but this doesn't help all of those who live in forested areas, or those blocked by hills. If homes or businesses are in the Ronan/Pablo area and have land lines, the fees are the same, but the additional \$33/month phone service fee is required, and they can get 8 MB for \$65/month. Again, this is not affordable for most Tribal families.

Hot Springs Telephone Company provides service starting at 384 kb/sec. at \$36/month plus the land line fee that ranges from \$25-\$36/month. Their highest speed for rural areas is 1.5 MB/sec. at \$40/month plus the land line fee. A few areas in or near the Town of Hot Springs can get 2 MB/sec. at \$48/month.

Century Link provides services from Polson north, but not all communities in that area receive service. Phone lines are required, with costs starting at \$29.95/month for 1.5 MB/sec.

These services are not provided across the board on the Reservation, and rates are too steep for many Tribal families. Businesses need access to higher speeds at reasonable, competitive prices.

Local or Tribal Government Participation

There are four counties whose boundaries intersect the Reservation, and four incorporated towns exist on the Reservation. CSKT already coordinates with these entities to provide police protection, wildland fire protection, and other resources for these areas, as well as managing the power utility that serves all of the Reservation's towns and the portions of the counties within the Reservation. The Tribes are interested in collaborating with these local governments to bring high-speed internet to our communities.

List of Anchor Institutions

Some Reservation anchor institutions have been connected to the internet, such as the two non-Tribal hospitals, and some Tribal government buildings. The following is a list of Tribally-run institutions that still need access to affordable internet service.

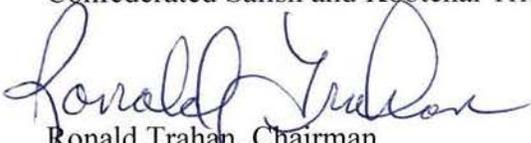
Kootenai Language School	Cemetery Road	Elmo	Education
NKwusm Language Immersion School	72040 Bitterroot Jim Road	Arlee	Education
Two Eagle River School (old phone line)	58020 Highway 93	Pablo	Education
Arlee Indian Senior Citizens Center	11 Bitterroot Jim Road	Arlee	Other
Hot Springs Indian Senior Citizens Center	214 N. Spring Street	Hot Springs	Other

Polson Indian Senior Citizens Center	710 First St. East	Polson	Other
Ronan Indian Senior Citizens Center	12 Terrace Lake Road	Ronan	Other
St. Ignatius Indian Senior Citizens Center	223 Blind Barnaby	St. Ignatius	Other
Elmo (former) Head Start Building	26382 Missoula Ave.	Elmo	Education
Pablo Early Head Start & College Dr Center	35639 Stanger Loop	Pablo	Education
Pablo Head Start Center	2 5 th Avenue East	Pablo	Education
Polson Head Start Center	301 8 th Avenue West	Polson	Education
Ronan Early Head Start Center	417 Andrew NW	Ronan	Education
Ronan Head Start Center	30 2 nd Circle NE	Ronan	Education
St. Ignatius Head Start Center	28 Toweepah Lane	St. Ignatius	Education
Turtle Lake Head Start Center	Turtle Lake Loop	Polson	Education

Thank you for considering our Expression of Interest in your decisions about the amount of funding that will be allocated in the Rural Broadband Trials. We commend you in this effort to connect rural communities and are ready to help you close the digital divide. If you have any questions about our letter of interest, please contact Janet Camel, Planning Director, at (406) 675-2700, ext. 1256 or janetc@cskt.org.

Sincerely,

Confederated Salish and Kootenai Tribes


 Ronald Trahan, Chairman
 Tribal Council