



Northern Arapaho Tribal Industries

P.O. Box 909 Riverton, WY 82501 Fax: 307-857-2001 Phone: 307-857-2004



March 7, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

Dear Ms. Dortch,

Please accept the Expression of Interest from Northern Arapahoe Tribal Industries (NATI) to participate in the FCC's Rural Broadband Experiment.

Background

Wind River Internet (WRI), a subsidiary of Northern Arapaho Tribal Industries, Inc. (NATI), is a tribally chartered Corporation that is 100% owned by the Northern Arapaho Tribe. WRI began operations in 2011, and provides Fixed Wireless Voice services to 220 business and residential customers; and Internet service to approximately 250 customers within the exterior boundaries of the Wind River Indian Reservation (WRIR).

The company started operations to address the need for quality and affordable voice services and Internet access in this underserved and unserved tribal land area.

Geographic Territory

WRI proposes to construct FTTH for three (3) tribal communities; and to extend its fixed wireless services to the community of Pavillion. The target area is within the Eligible Census Tracts as listed below, and identified on the attached map titled, "Proposed Geographic Territory," submitted as part of this Expression of Interest.

Eligible Census Tract	County	Tribal Community
56013940100	Fremont	Fort Washakie CDP & Ethete CDP
56013940201	Fremont	Town of Pavillion
56013940202	Fremont	Ethete CDP & Arapahoe CDP

The number of households and the population to be served with FTTH facilities are within the Eligible Census Tracts listed below. Additionally, they are identified on the attached map titled, "Household & Population Data," submitted as part of this Expression of Interest.



Eligible Census Tract	Tribal Community	Households/Density (per sq. mi.)	Population/Density (per sq. mi.)
56013940100	Fort Washakie CDP	549/26.27	1759/84.16
56013940100/56013940202	Ethete CDP	391/12.07	1553/47.93
56013940201	Town of Pavillion	108/514.29	231/1100
56013940202	Arapahoe CDP	488/17.55	1656/59.57

List of Community Anchor Institutions

The list of Anchor Institutions includes the following:

Eligible Census Tract	Tribal Community	Community Anchor Institution
56013940100/56013940202	Ethete CDP	Senior Center, Language Immersion School, Diabetes Program, CHR Program, Tribal Government, Arapaho Housing Program,
56013940201	Town of Pavillion	Wind River Elementary School, Wind River Middle/High School
56013940202	Arapahoe CDP	Senior Center, Language Immersion School, CHR Program, Recovery Center, WIC, Food Distribution, Economic Development Commission, Arapaho Utilities, Northern Arapaho Dept. of Social Services, St. Stephens School

Proposed Technology

WRI plans to implement FTTH systems in the three most populated tribal communities located within two Eligible Census Tracts; and expand its existing fixed wireless services to the town of Pavillion within the exterior boundaries of the Wind River Indian Reservation (WRIR).

WRI plans to utilize 37 miles of an existing HDPE duct system and construct an additional 32 miles of new HDPE duct system as the backbone to serve the three tribal communities and the town of Pavillion. The existing and new duct system will be utilized for the proposed fiber backbone as illustrated in the attached drawing titled, "HPD – 1".

The Optical Distribution Network (ODN) is designed as "Home Run" architecture with dedicated fiber to each subscriber.

The proposed Broadband Access System (BAS) will provide Active Ethernet (AE) fiber access technology. The BAS will provide each subscriber a dedicated capacity of 1Gbps to support high-speed Internet with future support for Triple-Play (voice, video, & data) services to approximately 1,500 subscribers within the three tribal communities and surrounding area.



High-speed Internet service will range from 10 Mbps to 100 Mbps for residential subscribers, and up to 1Gbps for government, business, educational, and healthcare subscribers at competitive rates to be determined. The VoIP solution when implemented will adhere to Universal Service requirements that are required for ETC compliance and designation.

WRI's existing fixed wireless access points will be strategically relocated to serve the most rural low density customers.

State and/or Local or Tribal Government Participation in and/or Support of Project

WRI's investment in its company's infrastructure to date is \$100,000. WRI's network consists of a core router located in Riverton, Wyoming with connectivity to Fort Washakie and Ethete via two leased fiber facilities. WRI utilizes unlicensed spectrum for microwave backhaul transport to thirteen (13) additional wireless access points at remote locations throughout the WRIR.

A Feasibility Study is underway and will be complete in May 2014. Additionally, WRI is planning to invest in the placement of 23 miles of fiber along 17 Mile Road at a cost of \$890,000 within their service area. The placement of this fiber will replace inferior analog systems with modern facilities that will lead to improved access to IP Based Broadband services.

Through a federally funded project Dubois Telephone Exchange placed fiber at select CAI's within the WRIR. As part of the placement of this fiber, an agreement was made with DTE to place ducts along this route that would be owned by WRI for future use. The estimated value of this agreement is \$456,700.

WRI respectfully submits that the FCC interpret and apply its governing statutes and regulations to this filing in a "manner that comports with tribal sovereignty and the federal policy of empowering tribal independence" as outlined in the Twelfth Report & Order.^[1]

Existing Providers

The Wind River Indian Reservation (WRIR) land base is contiguous and is served by two Local Exchange Carriers (LEC). CenturyLink is a Price Cap Carrier that provides services to the communities of Arapahoe, Ethete, and Ft. Washakie via the Riverton and Lander exchanges. Dubious Telephone Exchange (DTE) is a Rate of Return Carrier and is a subsidiary of Range Telephone Cooperative and serves the area northwest of Ft. Washakie, via the Crow Heart exchange.

Project Timeline

Internal funding is expected to be available in the 1st Qtr. of 2015 for the construction of the 23 mile fiber backbone which will begin in the Spring of 2015. If the Next Generation Network Experiment (NGNE) funding becomes available in 2015, the full project implementation will be initiated.

^[1] Twelfth Report and Order, FCC Rcd 12208 at Para. 119



If funded through NGNE, it is projected that the construction of the FTTH facilities for the three tribal communities, and the fiber expansion to Pavillion, WY, will be completed by the 4th Qtr. of 2016.

Scalability

With secured internal funding WRI will complete the fiber backbone facilities in 3rd Qtr 2015. If funding becomes available through the NGNE the entire fiber backbone will be completed in 3rd Qtr 2015. With NGNE funding the construction of the FTTH facilities will start in 2nd Qtr 2016 and is expected to be operational in the 2nd Qtr 2017.

Total Utility Investment

WRI will invest \$1,346,700, of which \$890,000 will be through internal funds, and will utilize an existing vacant underground duct system valued at \$456,700.

One Time Capital Infrastructure Investment Needed

WRI is seeking NGNE funding of \$10,463,933 to be dispersed over a period of two years.

Total Project Cost

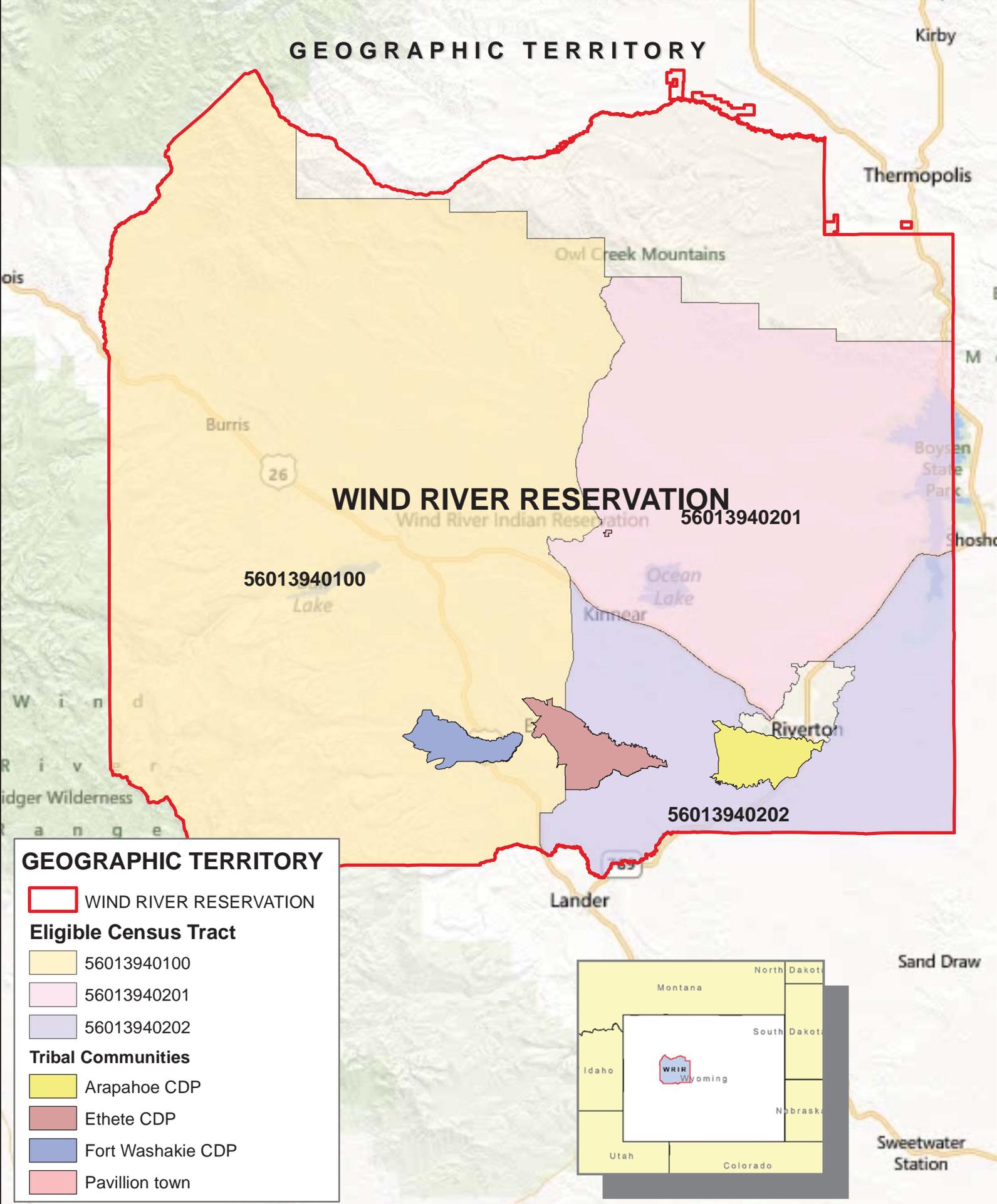
\$11,810,633

In conclusion, we look forward to the implementation of the FCC's Rural Broadband Experiment Program.

Sincerely,

Patrick Adam Lawson
General Manager
Northern Arapaho Tribal Industries

GEOGRAPHIC TERRITORY



GEOGRAPHIC TERRITORY

WIND RIVER RESERVATION

Eligible Census Tract

56013940100

56013940201

56013940202

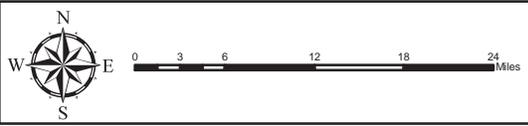
Tribal Communities

Arapahoe CDP

Ethete CDP

Fort Washakie CDP

Pavillion town



NATI
 98 Gas Hill Road
 Riverton, WY 82501
A 100% Tribal Owned Corporation

Prepared By: MLY-TICOM, Inc.
 Date: March 4, 2014

Drawing No:
 GT-1

HOUSEHOLD & POPULATION DATA

LEGEND

- WIND RIVER RESERVATION
- Eligible Census Tract**
- Tract ID = 56013940100
- Tract ID = 56013940201
- Tract ID = 56013940202
- FTTH Tribal Communities**
- Arapahoe CDP
- Ethete CDP
- Fort Washakie CDP
- Pavillion town
- Proposed 17 Mile Road Fiber Route (23 mi.)
- Proposed Fiber Route to Pavillion (9 mi.)
- Vacant HDPE Duct (37 mi.)
- Existing WRI Wireless Access Points

FIXED WIRELESS
Pavillion
 Total Households = 108
 Total Population = 231

ELIGIBLE CENSUS TRACT
 56013940201

ELIGIBLE CENSUS TRACT
 56013940202

ELIGIBLE CENSUS TRACT
 56013940100

FTTH

FTTH

FTTH

Fort Washakie CDP
 Total Households = 549
 Total Population = 1759

Ethete CDP
 Total Households = 391
 Total Population = 1553

Arapahoe CDP
 Total Households = 488
 Total Population = 1656



Prepared By: MLY-TICOM, Inc.
 Date: March 4, 2014

