

Tribal Engagement Obligation Exhibit

As background, it is important to understand that Congress addressed the land claims of Alaska Natives differently than it did with respect to native land claims in the Lower 48. Alaska claims were settled by Congress in the Alaska Native Claims Settlement Act (“ANCSA”), enacted in 1971. ANCSA divided Alaska into 12 geographical regions, and provided for the establishment of multiple for-profit Alaska Native Village Corporations and a single for-profit Alaska Native Regional Corporation in each region.¹ The Village Corporations own the surface estate of the lands granted to them under ANCSA; each Regional Corporation owns the subsurface estate of the lands granted to the Village Corporations in its region.² ANCSA also granted surface and subsurface lands and other rights directly to the Regional Corporations.³

While there are more than 200 Alaska Native entities included on the list of federally recognized tribes updated periodically by the Bureau of Indian Affairs pursuant to the *Tribe List Act*, the listed entities generally are not the Regional or Village Corporations.⁴ As a result of ANCSA, Alaska Native villages that have been recognized by the federal government – as opposed to the Village or Regional Corporations – generally do not own land. In this respect, Alaska is very different from areas in the Lower 48 where tribes own and have legislative jurisdiction over particular reservation lands.

As the provider of voice and data services to many of these Tribal lands in Alaska, including to Alaska Native regional hospitals, health clinics, and schools, GCI and its wholly-owned subsidiary, United Utilities, Inc. (“UUI”), engage in discussions with many Alaska Native representatives regarding their service needs, within the confines, of course, of any applicable E-Rate and Rural Health Care competitive bidding rules. GCI and UUI have also established an internal Rural Advocacy Committee to ensure that we are getting information to and receiving information from the rural communities that we serve, almost all of which are Alaska Native villages associated with a federally recognized tribal government. This includes an extensive customer survey program to solicit feedback from tribal communities regarding GCI/UUI’s service.

Pursuant to the direction of ONAP, GCI and UUI have made a variety of attempts to engage directly with more than 200 federally recognized tribal governments, using the contact information obtained from the National Congress of American Indians directory, the Bureau of

¹ See ANCSA §§ 7-8, 43 U.S.C. §§ 1606-1607.

² See *id.*

³ See *id.*

⁴ See Indian Entities Recognized and Eligible To Receive Services From the United States Bureau of Indian Affairs, 74 Fed. Reg. 40,218-02, 40,222-40,223 (Aug. 11, 2009).

Indian Affairs, or through independent company or tribal contacts. GCI and UUI sent representatives to many Alaska Native villages around the state, specifically to engage with tribal council members. In addition, GCI and UUI met with members of various Alaska Native villages at conferences such as the Association of Village Council Presidents annual conference and the Alaska Federation of Natives (“AFN”) annual convention. Summaries of many of these engagements, as well as sample results of individual customer surveys are attached; we will send a larger sample of survey responses under separate cover. Moreover, while not specifically undertaken for tribal engagement purposes, GCI representatives travel to and interact with Alaska Native communities all over the state, both to educate communities about GCI’s services and to listen to feedback from members of those communities. In addition to visiting large conferences and individual villages, GCI representatives also attended other events in 2013, such as the Tribal Unity Conference in Bethel. A calendar showing much of this travel for 2013 is also attached.

GCI and UUI have taken steps to address each of ONAP’s five suggested areas of Tribal engagement. That process and these discussions will continue and evolve over time.

1. “a needs assessment and deployment planning with a focus on Tribal community anchor institutions”

GCI and UUI have constructed a fiber-optic/microwave middle-mile network in Southwest Alaska (“TERRA”) and are currently expanding to parts of Northwest Alaska, terrestrially connecting communities to Anchorage for the first time. GCI and UUI representatives at all levels of the company have engaged in numerous discussions with residents and leaders of these communities to discuss deployment and services plans and changes resulting from this project, including service changes to the anchor institutions.

GCI and UUI provide service to several Alaska Native Regional Health Corporations throughout the state. For instance, we serve the Yukon-Kuskokwim Health Corporation (“YKHC”), including the regional hospital in Bethel and health clinics in each of the Mobility Fund Phase I communities. Though not a tribal government, YKHC is a Tribal Organization. Elected by the Tribal Councils of each of the 58 federally recognized Tribes in the YKHC service area, the Board of Directors is the chief policy-making body of the corporation, exercising all control, management, and supervision. Each Tribe’s governing council has authorized YKHC to act in its behalf. Within the strictures of the RHC competitive bidding rules, GCI and UUI engage with this tribal organization on a frequent basis.

As mentioned above, we have also engaged in discussions with larger Alaska Native groups, including The Alaska Federation of Natives (“AFN”), which is the largest statewide Native organization in Alaska. Its membership includes 178 villages (both federally-recognized tribes and village corporations), 13 regional Native corporations and 12 regional nonprofit and tribal

consortiums that contract and run federal and state programs. AFN is governed by a 37-member Board, which is elected by its membership at the annual convention held each October. The mission of AFN is to enhance and promote the cultural, economic and political voice of the entire Alaska Native community.

2. *“feasibility and sustainability planning”*

Because rural Alaska is so difficult and expensive to serve and because the population density is so low, technical feasibility and economic sustainability are the challenges to expanding service to small, remote Alaska Native communities. In many informal and formal discussions, GCI has discussed our attempts to improve rural Internet service in comparison with what exists now in the TERRA service area, but also the real microwave technology limitations we had on increasing usage allowances before we got a handle on usage patterns, and what we were doing to help folks manage usage. We have also explained the enormous expense/risk that GCI and UUI incur by building and expanding the terrestrial middle mile necessary to truly improve service, including \$11,000 of at-risk capital per household for TERRA-SW.

3. *“marketing services in a culturally sensitive manner”*

GCI and UUI are Alaskan companies and make every effort to market services in culturally sensitive manner to ALL Alaskans, including Alaska Natives. We have not yet had discussions on this specific topic with Tribal officials, but have sought feedback, including via the attached surveys.

4. *“rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes”*

The unique land ownership realities in Alaska require GCI and UUI to often engage with ANSCA Regional Corporations and Federal and State agencies with regard to many land issues, rather than federally recognized Alaska Native tribes. GCI and UUI have inquired about any additional frustrations, concerns, or ideas that your communities have with respect to these processes. GCI and UUI, of course, provide prior local notice of planned towers consistent with the Commission’s local notice requirements regarding tower siting.

5. *“compliance with Tribal business and licensing requirements”*

GCI is not aware of any business or licensing requirements specific to any federally recognized Alaska Native tribal government and has not heard otherwise from any of the affected tribal governments, but has sought feedback from the tribal governments.

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Tribes	Job Title	First Name	Last Name	Suffix	City
Agdaagux Tribe of King Cove	President	Etta	Kuzakin		King Cove
Akiachak Native Community	President	Daniel	George		Akiachak
Akiak Native Community	Chief	Ivan	Ivan	Sr.	Akiak
Algaaciq Native Village (St. Mary's)	President	Norbert	Beans		St. Mary's
Angoon Community Association	President	Wally	Frank	Sr.	Angoon
Arctic Village	First Chief	Jonathon	John		Arctic Village
Asa'carsarmiut Tribe	First Chief	James	Landlord		Mountain Village
Atqasuk Village	President	Jimmy	Nayukok		Atqasuk
Beaver Village	Chief	Rhonda	Pitka		Beaver
Birch Creek Tribe	1st Chief	Ernest	James	Sr.	Fort Yukon
Central Council Tlingit & Haida Indian Tribes	President	Edward	Thomas		Juneau
Chalkyitsik Village	First Chief	Stephanie	Herbert		Chalkyitsik
Cheesh-Na Tribal	President	Larry	Sinyon		Chistochina
Chevak Native Village	First Chief	James	Ayuluk		Chevak
Chickaloon Native Village	Chairman	Doug	Wade		Chickaloon
Chignik Bay Tribal Council	President	Roderick	Carlson		Chignik
Chignik Lake Village	President	Johnny	Lind		Chignik Lake
Chilkat Indian Village (Klukwan)	President	Kimberly	Strong		Haines
Chilkoot Indian Association	President	Harriett	Brouillette		Haines
Chinik Eskimo Community	President	Eleanor	Amaktoolik		Golovin
Chulounawick Native Village	President	Bambi	Akers		Emmonak
Craig Tribal Association	President	Edward	Thomas	Jr.	Craig
Curyung Tribal Council	First Chief	Thomas	Tilden		Dillingham
Douglas Indian Association	President	Clarence	Laiti		Juneau
Egegik Village	First Chief	Kevin	Deigh		Egegik
Eklutna Native Village	President & 1st Chief	Lee	Stephan		Chugiak
Ekwook Village	President	Luki	Akelkok	Sr.	Ekwook
Emmonak Village	President	Gretchen	Kameroff		Emmonak
Galena Village	1st Chief	Chrisopher	Sommer		Galena
Gulkana Village	President	Roy	Ewan		Gulkana
Healy Lake Village	First Chief	JoAnn	Polston		Fairbanks
Hoonah Indian Association	Chairman	Frank	Wright	, Jr.	Hoonah
Hughes Village	First Chief	Wilmer	Beetus		Hughes
Huslia Village	First Chief	Norman	Burgett		Huslia
Hydaburg Cooperative Association	President	Sidney	Edenshaw		Hydaburg
Igiugig Village	President	AlexAnna	Salmon		Igiugig
Inupiat Community of the Arctic Slope	President	Della	Shugluk		Barrow
Iqurmiut Traditonal Council	President	Sheila	Minock		Russian Mission
Ivanoff Bay Village	President	Edgar	Shangin		Anchorage
Kaguyak Village	President	Phyllis	Amodo		Akhiok
Kaktovik Village	President	Isaac	Akootchook		Kaktovik
Kasigluk Traditional Elders Council	President	Moses	White	Sr.	Kasigluk
Kenaitze Indian Tribe	Chairperson	Jaylene	Peterson-Nyren		Kenai
Ketchikan Indian Corporation	President	Norman	Arriola		Ketchikan
King Island Native Community	Chief	Benjamin	Payenna		Nome
King Salmon Tribe	President	Ralph	Angasan	Sr.	King Salmon
Klawock Cooperative Association	President	Archie Webster	Demmert		Klawock
Knik Tribe	President	Debra	Call		Wasilla
Kokhanok Village	President	Terry	Mann		Kokhanok
Koyukuk Native Village	1st Chief	Leo	Lolnitz		Koyukuk
Levelock Village	President	Apokedak	Ida		Levelock
Lime Village	President	Jennifer	John		McGrath
Manley Hot Springs Village	President	William	Bredeman-Woods		Manley Hot Springs
Manokotak Village	President	Moses	Toyukuk	Sr.	Manokotak
McGrath Native Village	First Chief	Sharon	Strick		McGrath
Mentasta Traditional Council	First Chief	Caroline Nora	David		Mentasta Lake
Naknek Native Village	President	Patrick	Peterson	Jr.	Naknek
Native Village of Afognak	President	Loretta	Nelson		Kodiak
Native Village of Akhiok	President	Linda	Amedo		Akhiok
Native Village of Akutan	President	Zenia	Borenin		Akutan
Native Village of Aleknagik	President	Daniel	Chythlook		Aleknagik
Native Village of Ambler	First Chief	Shield	Downey	Jr.	Ambler
Native Village of Atka	President	Mark	Snigaroff		Atka
Native Village of Barrow Inupiat Traditional Government	President	Thomas	Olemaun		Barrow
Native Village of Belkofski	President	Simeon	Kuzakin		King Cove

Tribe	Job Title	First Name	Last Name	Suffix	City
Native Village of Brevig Mission	President	Stewart	Tocktoo		Brevig Mission
Native Village of Buckland	President	Percy	Ballot	Sr.	Buckland
Native Village of Cantwell	President	Veronica	Nicholas		Cantwell
Native Village of Chenega	Chairman	Larry	Evanoff		Chenega Bay
Native Village of Chignik Lagoon	President	Clemens	Grunert	Jr.	Chignik Lagoon
Native Village of Chitina	President	Ronald	Mahle		Chitina
Native Village of Chuathbaluk	Chairman	Robert	Golley	Sr.	Chuathbaluk
Native Village of Council	Chairman	Chase	Gray		Nome
Native Village of Deering	President	Alvin	Iyatunguk	Sr.	Deering
Native Village of Diomedea (aka Inalik)	President	Patrick	Omiak	Sr.	Diomedea
Native Village of Eek	President	William	Brown		Eek
Native Village of Ekuk	President	Robert	Heyano		Dillingham
Native Village of Elim	President	Robert	Keith		Elim
Native Village of Eyak	Chairman	Robert	Henrichs		Cordova
Native Village of False Pass	President	Ruth	Hoblet		False Pass
Native Village of Fort Yukon	First Chief	Nancy	James		Fort Yukon
Native Village of Gakona	President	Darin	Gene		Gakona
Native Village of Gambell	President	Eddie	Ungott		Gambell
Native Village of Georgetown	President	David	Kutch		Anchorage
Native Village of Goodnews Bay	President	George	Bright	Sr.	Goodnews Bay
Native Village of Hamilton	President	George	Williams		Kotlik
Native Village of Hooper Bay	Chief	David	Bunyun		Hooper Bay
Native Village of Kanatak	President	Shawn	Shanigan		Wasilla
Native Village of Karluk	President	Alicia	Reft		Karluk
Native Village of Kiana	President	Charlie	Curtis		Kiana
Native Village of Kipnuk	President	Paul	Paul		Kipnuk
Native Village of Kivalina	President	Millie	Hawley		Kivalina
Native Village of Kluti-Kaah (aka Copper Center)	President	ToniLee	Jackson		Copper Center
Native Village of Kobuk	President	Rosa	Horner		Kobuk
Native Village of Kongiganak	President	Peter	Daniel	Sr.	Kongiganak
Native Village of Kotzebue	President	Hadley	Jeff		Kotzebue
Native Village of Koyuk	President	Darin	Douglas		Koyuk
Native Village of Kwigillingok	President	Tony	Phillip		Kwigillingok
Native Village of Kwinhagak	President	John	Mark		Quinhagak
Native Village of Larsen Bay	President	Mary	Nelson		Larsen Bay
Native Village of Marshall	President	Theresa	Shorty		Marshall
Native Village of Mary's Igloo	President	Lucy	Oquilluk		Teller
Native Village of Mekoryuk	President	Howard	Amos		Mekoryuk
Native Village of Minto	Chief	Lori	Baker		Minto
Native Village of Nanwalek (aka English Bay)	First Chief	Wally	Kvasnikoff		Nanwalek
Native Village of Napaimute	President	Brook	Kristovich		Bethel
Native Village of Napakiak	President	Jacob	Black		Napakiak
Native Village of Napaskiak	President	Chris	Larson		Napaskiak
Native Village of Nelson Lagoon	President	Paul	Gundersen		Nelson Lagoon
Native Village of Nightmute	President	Paul	Tulik		Nightmute
Native Village of Nikolski	President	Arnold	Dushkin		Nikolski
Native Village of Noatak	President	Whittier	Burns	Sr.	Noatak
Native Village of Nuiqsut	President	Bernice	Kaigelak		Nuiqsut
Native Village of Nunam Iqua	President	James	Adams		Sheldon's Point
Native Village of Nunapitchuk	President	Jimmy	Stevens	Sr.	Nunapitchuk
Native Village of Ouzinkie	President	Paul	Panamarioff		Ouzinkie
Native Village of Paimiut	President	Franklin	Napoleon		Hooper Bay
Native Village of Perryville	President	Gerald	Kosbruk		Perryville
Native Village of Pilot Point	President	Sophie	Aloyo		Pilot Point
Native Village of Pitka's Point	President	William	Riley	, Jr.	St. Mary's
Native Village of Point Hope	President	Caroline	Cannon		Pt. Hope
Native Village of Point Lay	President	Julius	Rexford		Point Lay
Native Village of Port Heiden	President	Annie	Christensen		Port Heiden
Native Village of Port Lions	President	Arnold	Kewan		Port Lions
Native Village of Ruby	First Chief	Donald	Honea	Jr.	Ruby
Native Village of Saint Michael	President	Shirley	Martin		St. Michael
Native Village of Savoonga	President	Mitchell	Kiyuklook		Savoonga
Native Village of Scammon Bay	President	Frank	Aguchak		Scammon Bay
Native Village of Selawik	President	Clyde	Ramoth		Selawik
Native Village of Shaktoolik	President	Simon	Bekoalok	Jr.	Shaktoolik

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Native Village of Shishmaref	President	Stanley	Tocktoo		Shishmaref
Native Village of Shungnak	President	Glenn	Douglas		Shungnak
Native Village of Stevens	President	Randy	Mayo		Stevens Village
Native Village of Tanacross	President	Roy	Denny		Tanacross
Native Village of Tanana	President	Kathline	Peters-Zuray		Tanana
Native Village of Tatitlek	President	David	Totemoff		Tatitlek
Native Village of Tazlina	President	Johnny	Goodlataw		Glennallen
Native Village of Teller	President	Wesley	Okbaok		Teller
Native Village of Tetlin	President	Donald	Adams		Tok
Native Village of Tuntutuliak	President	Nick	Frank		Tuntutuliak
Native Village of Tununak	President	George	Hooper	, Sr.	Tununak
Native Village of Tyonek	President	Frank	Standifer	III	Tyonek
Native Village of Unalakleet	President	Kathy	Johnson		Unalakleet
Native Village of Unga	President	John	Foster		Sand Point
Native Village of Venetie Tribal Government	First Chief	Julian	Roberts		Venetie
Native Village of Wales	President	Ellen	Richard		Wales
Native Village of White Mountain	President	Lincoln	Simon	Sr.	White Mountain
Nenana Native Association	First Chief	William	Lord		Nenana
New Koliganek Village Council	President	Herman	Nelson	Sr.	Koliganek
New Stuyahok Village	President	Dennis	Andrew	Sr.	New Stuyahok
Newhalen Village	President	Raymond	Wassillie		Newhalen
Newtok Village	President	Moses	Carl		Newtok
Nikolai Village	First Chief	Nick	Alexia	Sr.	Nikolai
Ninilchik Village	President	Richard	Encelewski		Ninilchik
Nome Eskimo Community	President	Cynthia	Ahwinona		Nome
Nondalton Village	President	Rick	Delkittie, Sr.		Nondalton
Noorvik Native Community	President	Joshua	Melton		Noorvik
Northway Village	President	Teddy	Northway	Jr.	Northway
Nulato Tribal Council	1st Chief	Michael	Stickman		Nulato
Nunakauyarmiut Tribe	President	Thomas	Carl		Toksook Bay
Organized Village of Kake	President	Casimero	Aceveda	Jr.	Kake
Organized Village of Kasaan	President	Richard	Peterson		Kasaan
Organized Village of Kwethluk	President	Martin	Andrew		Kwethluk
Organized Village of Saxman	President	Lee	Wallace		Ketchikan
Orutsararmuit Native Village	Executive Director	John	Guinn		Bethel
Oscarville Traditional Village	President	Nicolai	Stevens		Napaskiak
Pauloff Harbor Village	President	Amber	Karlsen		Sand Point
Pedro Bay Village	President	Keith	Jensen		Pedro Bay
Petersburg Indian Association	Council President	Derek	Lopez		Petersburg
Pilot Station Traditional Village	President	Palassa	Beans		Pilot Station
Platinum Traditional Village Council	President	Norman	Small		Platinum
Port Graham Village Council	First Chief	Patrick	Norman		Port Graham
Portage Creek Village	President	Maryanne	Johnson		Anchorage
Qagan Tayagungin Tribe of Sand Point Village	President	Rayette	McGlashan		Sand Point
Qawalangin Tribe of Unalaska	President	Denise	Rankin		Unalaska
Rampart Village	President	Tom	Wiehi		Rampart
Saint George Island	President	Christopher	Merculief		St. George Island
Saint Paul Island	President	Amos	Philemonoff		St. Paul Island
Seldovia Village Tribe	President/CEO	Crystal	Collier		Seldovia
Sitka Tribe of Alaska	Chairman	Lawrence	Widmark	Jr.	Sitka
Skagway Village	President	Delia	Commander		Skagway
South Naknek Village	President	Donald	Nielsen		South Naknek
Stebbins Community Association	President	Peter	Martin	Sr.	Stebbins
Sun'aq Tribe of Kodiak	Chairperson	Brenda	Schwantes		Kodiak
Takotna Village	Chief	Vera	Goods		Takotna
Tangirnaq Native Village	President	Margaret	Roberts		Kodiak
Telida Village	First Chief	Steven	Nikolai		Nikolai
Traditional Village of Togiak	President	Moses	Kritz		Togiak
Tuluksak Native Community	President	Wascca	Fly		Tuluksak
Twin Hills Village	President	John	Sharp		Twin Hills
Ugashik Village	President	Kristi	Downing		Anchorage
Umkumiut Native Village	President	Joseph	Tony		Nightmute
Village of Alakanuk	President	Ben	Phillip		Alakanuk
Village of Anaktuvuk Pass	President	Harry	Hugo		Anaktuvuk Pass
Village of Atmautluak	Vice President	Nicholai	Pavilla	Sr.	Atmautluak

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Village of Bill Moore's Slough	President	Cheryl	Sinka		Kotlik
Village of Chefornak	President	Isadora	Kilanak		Chefornak
Village of Clarks Point	President	Harry	Wassily	Sr.	Clarks Point
Village of Dot Lake	President	William	Miller		Dot Lake
Village of Iliamna	President	Lorene	Anelon		Iliamna
Village of Kaltag	First Chief	Fred	Alexie	Sr.	Kaltag
Village of Kotlik	President	Cheemuk	Rose		Kotlik
Village of Lower Kalskag	President	Nastasia	Levi		Lower Kalskag
Village of Ohogamiut	President	Maurice	Turet		Marshall
Village of Old Harbor	President	Conrad	Peterson		Old Harbor
Village of Salamatoff	President	Penny	Carty		Kenai
Village of Solomon	President	Kirsten	Timbers		Nome
Village of Venetie	First Chief	Dwayne	John		Venetie
Village of Wainwright	President	June	Childress		Wainwright
Wrangell Cooperative Assn	President	Christian	Ernest		Wrangell
Yakutat Tlingit Tribe	President	Victoria	Demmert		Yakutat
Yupit of Andreafski	President	Gail	Alstrom-Beans		St. Mary's