

Wiegand, Ryan

From: Rice, Jean
Sent: Friday, February 12, 2021 2:53 PM
To: jimdberlin@gmail.com; BroadbandUSA
Subject: Re: Comments below related to the funding to be provided by the Consolidated Appropriations Act 2021 for Tribal Broadband Connectivity Grants and Broadband Infrastructure Deployment Grants

From: jimdberlin@gmail.com <jimdberlin@gmail.com>
Sent: Friday, February 12, 2021 2:36 PM
To: Rice, Jean <JRice@ntia.gov>
Subject: Comments below related to the funding to be provided by the Consolidated Appropriations Act 2021 for Tribal Broadband Connectivity Grants and Broadband Infrastructure Deployment Grants

Dear Ms. Rice:

Alaska Tribal Spectrum (ATS) is a non-profit tribally owned consortium that consists of almost 80 rural tribes in Alaska that are ready to provide 2.5 GHz radio spectrum to support last mile network delivery. The members of ATS are forwarding the comments below related to the funding to be provided by the Consolidated Appropriations Act 2021 for Tribal Broadband Connectivity Grants and Broadband Infrastructure Deployment Grants.

We ask NTIA to support the following related to Consolidated Appropriations Act 2021 funding language to meet the unique needs in Alaska:

1. Allow for a joint multi-tribal coalition proposal.
 2. Allow non-traditional fixed broadband solutions i.e nextgen GEO or LEO Satellite as an acceptable use of funding.
 3. Recognize the unique challenges to enabling broadband in Alaska.
 4. If any match becomes required, to make it as minimal as possible due to the extreme need in Alaska.
1. Allow for a joint multi-tribal coalition proposal.
A joint multi tribal application will allow for maximizing effectiveness and fiscal efficiency to generate a large enough funding effort to acquire the needed satellite middle mile and last mile combination to rapidly provide a sustainable solution for the rural broadband problem for the entire state. A total near-term statewide solution is only possible as a large integrated effort rather than a series of isolated traditional approaches.
 2. Allow non-traditional fixed broadband solutions i.e nextgen GEO or LEO Satellite as an acceptable use of funding.
A tribal only led coalition is planning to apply for one coordinated application for the whole state that will fund new middle mile satellite capabilities (nextgen GEO and LEO) for total Alaska coverage that can deliver a consistent sustained 25/3 for up to 160,000 subscribers to support any consumer broadband need. The application will also seek funding for enough last mile radio network installations to connect 150-200 rural communities representing 20,000 unserved households initially. The end result will be self-sustaining at an affordable consumer price point that can enable all areas anywhere in Alaska. The cost per household for this Satellite project is 1/10th of the cost of traditional new wired solutions.
 3. Recognize the unique challenges to enabling broadband in Alaska.
The State of Alaska ranks last in terms of internet connectivity when compared to all other states. The reasons are:
 - As the least-connected state, Alaska is not only physically, but also digitally divided from the contiguous USA. This means that internet technologies are not equally available in Alaska.
 - Despite being the biggest state in the country, Alaska has the lowest amount of broadband infrastructure. While some boroughs have up to 99% access for 25+ Mbps wired broadband services, most of the boroughs in Alaska have 0% access.

- Adequate but costly broadband exists (25/3 Mbps or greater) for the larger population centers in Alaska but in rural Alaska the situation is starkly different.
- An estimated 150,000+ residents have internet connections at less than 25/3. (Underserved)
- An estimated 60,000 residents (20,000 households) in rural Alaska do not have any wired broadband connection available at all. (Unserved)

The following characterizes the challenges facing rural Alaskans in hundreds of locations.

- Most of the rural communities with the unserved broadband populations in Alaska are totally isolated with the only way in or out by boat or plane. There are no roads that connects one village to another. They rely on local electric generator power and have no access to an outside grid. It is not possible to drive to a job in the winter in a nearby community, where there is a broadband connection, because there are none to drive to and no one nearby has broadband anyway.
- In the majority of rural Alaska only minimal First, Middle, or Last Mile Infrastructure exists. There is only outdated, 1st generation satellite internet which is slow and expensive. There are no nearby connections to broadband fiber or microwave hops to fiber. There is expensive legacy (highly federally e-rate subsidized) satellite direct connections for school and clinic that is at or near capacity.
- Because the internet is so expensive and unreliable, and because the income levels for most rural year-round residents are less than 25k per year on average, most cannot afford internet and use it sparingly. Only a small percentage < 5% of rural residents actually subscribe to internet service, which is not broadband, and it is capped and expensive. Some get bills for over \$1000 per month for extremely poor service. (1-10 Mbps service only)
- Unless you are at the school (which is unavailable in the summer) or you are a tribal or city official allowed to use the on-premises service for business, most residents have no broadband internet whatsoever.
- Students can only use the internet when at school, and homework requiring access is a major challenge.
- Remote/distance learning is not possible. The schools cannot teach their students at home in a pandemic. The kids cannot connect to the school or any other type of learning from home.
- The weather in Alaska can be especially harsh and dangerous with winds and snow, in the winter months. This is further isolating because it often knocks out the telecommunications and internet, just when it is needed most.
- If there is an emergency like a tsunami which is a real threat for coastal communities, there is no way for people to communicate with their extended family outside of the village. If there is a serious injury, there are often no doctors in many of the rural villages. You cannot drive someone to a nearby community with a hospital because there are no roads to any other community. There may only be health aides who will try to keep you stabilized until a plane or helicopter medevac, weather permitting, can land and take you to a more populated area. There is no access to telemedicine to speak with specialist or for even routine communication with a doctor.
- There are many Search and Rescue efforts that happen yearly. Having the ability to have devices that can be found with broadband connections greatly increases the effectiveness to locate missing people especially in the some of the harshest climate on earth.
- Law enforcement is extremely limited on a local level in many villages. Many villages rely solely on the State Police which are dispatched from a remote location. This could take days for a response.

Thank you for your consideration.

Sincerely,

Jim Berlin
President



Alaska Tribal Spectrum

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