How should NTIA implement a program with such broad eligibility, specifically to ensure that the priorities of tribal nations are represented?

More direct consultation with tribal organizations,
such as Midwest Alliance of Sovereign Tribes or the Minnesota Chippewa Tribe or larger organizations. Consultation with individual bands may be difficult to achieve but if they can contact some of the larger organizations, that might be a better way to get a broader input.

Don't use language that is limiting and listen to the needs of the communities before creating the program/RFP. Each nation is going to be unique in their needs and their level of on-staff expertise and partners. Some will be ready to roll, while others will be wondering where to start.

Should each tribal government be limited to one application for all eligible entities?

What is the form of eligibility? Some agencies require the applicant be an eligible telecommunications carrier and some do not. One application is a good recommendation. Though it should be spelled out the geographic area that is eligible. The Tribal Nation itself. What if the Tribal nation's boundaries are over several counties and what about consortium of Tribes. Could they get multiple grants for different geographic jurisdictions?

Could they get multiple grants for different geographic jurisdictions? Example: MN Chippewa Tribe consists of 6 different Tribes, however, the individual Tribes would be completing separate applications as they have their own governing structure and boundaries. Should allow for expansion beyond reservation boundaries.

What types of projects should be eligible? What should not be eligible?

These should be eligible: Construction costs, equipment and material costs, central office, engineering, planning, connectivity to the home and end user equipment.

Ongoing maintenance, subscriber costs should also be considered.

How should NTIA address the use of federal funds in the same area?

Could other federal funds be used as a match? What are the matching requirements for this grant?

How can NTIA ensure equitable distribution of funds?

The USDA Community Connect Program has a good system for rating and distributing grant. That may be a good source for NTIA to review for guidance.

Which is the best method for achieving an equitable distribution? eg. up-front allocation (e.g., formula or standard amount); competitive only; combination of up-front allocation or competitive grant program.

Formula grants for pre-planning and engineering activities, competitive grants for construction and build out of networks.

Should every tribe receive a standard allocation for planning or other eligible expenses, with the balance to be used in a competitive program for implementing the plan?

Yes, standard allocations for Tribes just starting: funding can be used for planning, engineering and environmental clearances prior to applying for a construction grant.

Do you have suggestions for expediting the environmental process?

•Do you have the resources today to address the requirements of NHPA, EAand Cultural Resources or would you need technical assistance?

•What should NTIA be aware of with regards to historic preservation, environmental assessment, and cultural resources that could be improved?

•What is your biggest environmental or cultural resource concern with this program?

Having a phased process for this program would help this. The "Planning Grant" can get planning, engineering and environmental process started to help expedite the project overall. The competitive construction grants can then have these requirements of the Planning grant be accomplished prior to submittal. This will assure federal funds are used in a faster and more effective manner.

How can NTIA ensure that grant funds are prioritized to unserved areas on Tribal Lands?
Staff from USDA Community Connect program visit proposed grant sites and conduct their own research on internet types and speeds. This could be replicated by NTIA.

What is the best way to demonstrate if an area is unserved?

The applicant can take testimony from community members and community member, business owner and government staff can record "speed test" results in their applications to show the lack of internet connectivity or lack of speed.

What threshold would constitute "unserved"?

In the state of Minnesota the threshold is 25/3 25 mb down and 3 mb upload. This can be used as a guide. Though the recommendation should be higher at 100/20.

How can NTIA establish reporting requirements that are not overly burdensome but sufficiently inform the public on how federal funds are used and how much more federal funding is needed?
Current Federal reporting requirements are extremely difficult. Informing the general public should not be our goal. Informing our local subscriber base should be focused. Focus on the program deliverables: Subscriber counts, households serviced, end use (home schooling, tele work, tele health, individual business growth use)

Do you have other input you would like to share that has not been covered yet?

Grant term should be 2 or 3 years, preferably 3. One year is not enough time especially if there are ROW acquisitions, environmental reviews, easements, licensing, climate and geology as factors in the build out.

What helped the Fond du Lac Band be successful?
Partnerships
- The Blandin Foundation had funding available early on for a feasibility study. This helped guide the direction we should take when it came to engineering and construction.
- The Blandin Foundation had a "Broadband Communities" program that funded small scale community projects. These projects assisted in educating and gathering feedback from community members in order to demonstrate the need for reliable broadband internet speeds.
- Local Service Co-Op – In order for FDL to secure their initial round of funding (through RUS – Community Connect) they needed to partner with an existing service provider. Ultimately, FDL became their own service provider and were able to take the Co-Op off of the project. This was a frustrating process. Lesson learned - trust the Sovereignty of each Tribe.
- Broadband Task Force – the State of MN has a Broadband Task Force which FDL has representation on. Having a seat at this table allows for networking with experts and gives the state a perspective on what the needs of Tribal Communities are.

In-House Leadership

- IT Division – FDL has an IT division with years of expert experience
- FDL was able to secure an Engineer to work on the project. This person had experience with previous telecommunication organizations and projects.
- Grant Writers – FDL has grant writers who could dedicate time to work on the project

- Legal Division – FDL has a small but robust legal division

Out of House Help

- FDL contracted out to a grant writer to complete the first application (unsuccessful). FDL's internal team was able to take the application the following year, updated it to represent the community better and was successful. Without the first draft by someone experienced with telecommunication grants, we may not have been successful.
- Outside Council – FDL contracted with outside council who are experts in telecommunications projects. This was extremely helpful when it came to becoming an ISP and executing the legal end of the project.

Not all Tribes will have access to resources like these