

February 10, 2021

Douglas W. Kikoph – Associate Administrator
Office of Telecommunications and Information Applications
National Telecommunications and Information Administration

Via email: broadbandusa@ntia.gov

RE: Broadband Funding Allocations

Mr. Kinkoph:

I write to you today on behalf of the Board of Directors of Voice of the Arctic Iñupiat (VOICE). VOICE is a 501(c)(4) non-profit corporation whose twenty-four members include the representatives of federally-recognized tribes, municipal governments, Alaska Native corporations, our regional health-nonprofit, and the tribal college from the North Slope of Alaska. Together, we speak as one on behalf of our region to promote and advocate issues for the benefit of our communities and our people.

As you know, the COVID-19 pandemic has highlighted the importance of affordable and reliable broadband access as well as the major discrepancies in connectivity between urban and rural areas, specifically in Native communities. The cost of service in many of our communities presents an insurmountable barrier to many families to access this resource, which is critical to the health and economic wellbeing of our people; I have heard reports of families paying upwards of \$1,000 per month for internet access. Recently, one teacher based in Utqiagvik, our region's largest and arguably most connected town, estimated that approximately 3% of his students were able to participate in online learning in some format during the pandemic.

Two regional entities that operate on the North Slope – Arctic Slope Native Association (ASNA), our regional health nonprofit, and Iḷisaġvik College, based in Utqiagvik and the only tribal college operating in Alaska – both rely heavily on affordable and reliable connectivity to provide critical services and education to the region. The opportunity to grow telemedicine services is reliant on the improvements in connection services in our communities; the current system requires patients to travel to either Utqiagvik or Anchorage for health services that could be offered at home. ASNA has been working hard to expand their services in communities, including in the areas of imaging, tele psychiatry, cardiology, and sleep; critical health services that could vastly improve the quality of life for our people. Iḷisaġvik College operates with the lowest connectivity of any United States Institute of Higher Education and pays the highest costs – \$250,000 per year. Iḷisaġvik has been offering most classes remotely

through the pandemic and has been struggling with frequently dropped virtual classes, trouble accessing WIFI for students and teachers during peak hours, and students unable to participate due to prohibitive costs. Overall, these challenges – both at ASNA and Iļisaġvik – result in the North Slope falling behind other parts of Alaska and the US in critical areas.

All obstacles aside, we appreciate the federal government increasing access to broadband expansion and funding opportunities to address this critical issue. We hope that our comments here will help inform your efforts to establish guidelines for distributing this essential funding.

We see many federal agencies tie funding to “tribal lands,” a regime that is inadequate and incongruent to the complex landscape of land ownership in Alaska. The Alaska Native Claims Settlement Act of 1971 was a new approach by Congress intended to be an alternative to and in many cases an improvement on the reservation system employed elsewhere in the United States. It divided the state into twelve distinct regions and mandated the creation of twelve private Alaska Native regional corporations as well as many private village corporations. The Act mandated that both regional and village corporations be owned by enrolled Alaska Native shareholders. Through ANCSA, the federal government transferred over 40 million acres of land to the aforementioned Alaska Native regional and village corporations. On the North Slope, our regional corporation – Arctic Slope Regional Corporation (ASRC) – owns lands that overlap our historic tribal lands. These private lands only represent a fraction of our traditional lands, both the federal government and the State of Alaska own significant swaths of land in our region. As such, our tribal ‘lands’ are better represented by subsistence areas, which are overseen by our federally recognized regional tribal government, the Iñupiat Community of the Arctic Slope (ICAS). It is also important to mention that while tribes in Alaska do not directly own land, many tribal members are also shareholders in their respective village corporations and the regional corporation and have ownership over the land through their corporations. We feel strongly that due to these considerations, it is critical to include both the federally recognized tribes in Alaska and Alaska Native Corporations in any funding allocation scheme.

Another area of concern is appropriating funds based on population density. We realize that in many states, your aim is that this program be available to tribes and rural communities that are characterized by low population densities. In Alaska, due to the lack of roads and difficulties transporting materials, many villages have a small footprint and are therefore much more “dense,” yet are some of the most rural and disconnected places in America.

There are many barriers and challenges in place when it comes to deploying broadband in our communities. Our region and communities are in the high arctic and are not connected by road; we rely on an expensive barge and air transport system to deliver goods and materials to our villages. On top of that, the North Slope encompasses eight communities that are spread over a land mass that totals almost 100,000 square miles – our local borough is larger

than 39 states. Further, the North Slope is characterized by difficult weather and freezing temperatures 10 months out of the year which makes infrastructure construction and maintenance of technology extremely difficult. These unique aspects of our region and communities must be considered as it is difficult to make apples-to-apples comparisons with other tribal communities that are on the road system with easier access to resources.

ICAS recently applied for the FCC 2.5 Spectrum for our region and upon receiving a license will have conditions to build out infrastructure to our communities. As part of their application, they provided the attached information to the FCC that may help inform you about the full extent of land and subsistence use areas that our people rely on in the region. ICAS' buildout effort will require collaboration amongst many regional entities with the support of external partners.

I thank you sincerely for your consideration of the points we have outlined in this letter. We have attached several documents to this letter, including the ICAS constitution, subsistence use maps for communities in our region, a map of the North Slope region, and presentations given by Iḷisaġvik College and Arctic Slope Native Association at a recent broadband workshop hosted by VOICE that we hope will be useful to you to better understand our region. Additionally, I hope that you will not hesitate to reach out to our Program Manager, Mackenzie Fischer, at mfischer@inupiatvoice.org should you like any further clarification or have any questions for Voice of the Arctic Iñupiat; VOICE is happy to be a resource for you where we can.

Taikuu,



Sayers Tuzroyluk, Sr.
President

CC: Morrie Lemen, Iñupiat Community of the Arctic Slope
Martha Monnin, Arctic Slope Native Association
Justina Wilhelm, Iḷisaġvik College
Kristina Wilcox, Capitol Hill Consulting Group

Attachments:

Subsistence Use Area Maps
Regional Map of ANCSA and Tribal Areas
ICAS Constitution
Iḷisaġvik Broadband Presentation
Notes from ASNA Broadband Presentation