



# YUROK TRIBE

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February 11, 2021

Tribal Broadband Connectivity Program  
U.S. Department of Commerce  
National Telecommunications and Information Administration  
[broadbandusa@ntia.gov](mailto:broadbandusa@ntia.gov)

Re: Tribal Broadband Grant Program

Aiy-ye-kwee'

The Yurok Tribe applauds the creation of the Tribal Broadband Connectivity Program ("TBC Program"), commends NTIA for its swift inclusion of the Yurok Tribe through formal consultation and appreciates this opportunity to provide comments on the administration of the TBC Program.

## **Background**

The Yurok Tribe is a sovereign nation and federally recognized Tribe, the largest within California with over 6,200 enrolled members. The Yurok Tribe's rural reservation is approximately one hour south of the Oregon border; where the Pacific Ocean meets the Klamath River and extending approximately forty-five (45) miles upriver. The Yurok Tribe's aboriginal lands extends for more than 200 square miles. The Yurok Tribe government is organized under the Yurok Constitution to, in part, "provide for the health, education, economy, and social wellbeing of our members and future members" and to ensure "peace, harmony, and protection of individual human rights among our members and among others who may come within the jurisdiction of our tribal government." Ensuring adequate services—including internet services—is part of the Yurok Tribe's responsibility.

The Yurok Tribe owns and operates Yurok Connect, a Wireless Internet Service Provider, that provides services to Yurok Reservation residents within Del Norte and Humboldt counties. Yurok Connect is a vital resource on the Yurok Reservation, providing 10/1 Mbps service to homes and buildings that would otherwise be unserved. The Yurok Tribe has been working diligently to expand access by extending backhaul services. However, many homes on the reservation are still unserved and 10/1 Mbps is not adequate for modern life, particularly in a pandemic that impacts remote workers, students, telehealth, and other needs requiring bandwidth sufficient to sustain videoconference and communications software.

## **Recommendations:**

The Yurok Tribe recommends the following:

1. Prioritization of unserved and underserved tribal communities as demonstrated by the Tribes; including actual broadband availability, speeds, frequency of out-of-service events, and even price within tribal lands and proposed project areas, as opposed to relying solely on outside data that does not always reflect the reality on the ground. For example, the recent Rural Digital Opportunity Fund awards on the Yurok Reservation to a private entity that has no communication

or collaboration with the Yurok Tribe should not be considered when evaluating applications, tribal need, or even service availability without proof that an actual broadband project is underway and will actually provide accessible service to homes in the area.

2. Avoiding formulas based solely on population size and/or households to be served, as such prioritization has contributed to the digital divide faced by Tribes in rural areas.
3. If a formula is used, lack of actual connectivity and tribal needs should be more heavily weighed than population or households to be served, and capacity to implement the project should be a factor.
4. Consider whether proposed projects adjacent to Tribal Lands, or reservations, are necessary to actual connectivity. For example, allowing for “middle-mile” projects that are necessary to deliver fiber to the premises on Tribal Lands or reservations. The rural nature of many Tribal nations, including ours, requires these “middle-mile” projects.
5. Due to the possible delays created by adherence to historic preservation and environmental process and regulation (including tribal law), “pre-approve” extensions of project timelines to accommodate the time needed to successfully complete project construction. Tribes need early and clear direction related to statutorily allowed deadlines and exceptions for committing and expending TCB Program funds.
6. Some Training and Technical Assistance funds from the TCB Program should be focused on the creation of a curriculum for Tribes to train telecommunication and broadband workers to fill the many positions needed to successfully deploy and manage TCB Program projects. Tribes need to have internal knowledge that ensures protection of tribal interests and informed decisions by tribal leaders.

We look forward to more opportunities to take the lead on broadband and telecommunications infrastructure, network, and service development for the benefit of Yurok citizens and all Yurok Reservation residents.

Sincerely,



Joseph L. James  
Chairman, Yurok Tribe