



ALASKA FEDERATION
OF NATIVES

April 13, 2009

UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration

UNITED STATES DEPARTMENT OF AGRICULTURE
Rural Utilities Service

**Re: *Alaska Federation of Natives' Comments In the Matter of American Recovery
and Reinvestment Act of 2009 Broadband Initiatives***
Docket No. 090309298-9299-01

To Whom It May Concern:

Attached please find Comments prepared by the Alaska Federation of Natives ("AFN") in the matter of American and Reinvestment Act of 2009 regarding Broadband Initiatives, found in Docket No. 090309298-9299-01. AFN is the largest umbrella organization for Alaska Natives. 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 certain 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.

If implemented successfully in remote and rural Alaska Broadband Initiatives in this docket will have an enormous, positive impact upon the lives and living conditions of Alaska Native peoples living in rural Alaska. We strongly urge you to fully consider AFN's views and incorporate them into the guidelines that you provide.

Thank you for your consideration. If you have any questions concerning our comments, please do not hesitate to call me at 907-274-3611.

Sincerely,

Nelson N. Angapak, Sr.
Vice President



**ALASKA FEDERATION
OF NATIVES**

**DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration**

**DEPARTMENT OF AGRICULTURE
Rural Utilities Service**

In the Matter of)
)
American Recovery and Reinvestment Act) Docket No. 090309298-9299-01
of 2009 Broadband Initiatives)
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COMMENTS OF THE ALASKA FEDERATION OF NATIVES

April 13, 2009

**Executive Summary of the Alaska Federation of Natives' Comments In the Matter of
American Recovery and Reinvestment Act of 2009 Broadband Initiatives
Docket No. 090309298-9299-01**

Rural villages in Alaska are geographically remote from urban areas and are “rural” in every respect, as there are no interconnecting roads or genuine broadband connectivity on which to base employment, improved health care, and expanded educational opportunities. Internet and other telecommunications in rural Alaska are provided through satellite links. Satellite service has a small throughput, and can barely handle audio streaming (much less video streaming), which is *essential* for robust and effective telemedicine, distance learning, and economic development. This is in sharp contrast to urban America, where reliable, state-of-the-art fiber allows for these applications directly -- or from hubs. In addition, not only is current satellite-based Internet service inadequate to handle today’s broadband applications as well as tomorrow’s, but it is subject to weather, sun spots, and other frailties and can be afforded by only a few.

NTIA and RUS should approach broadband deployment as a national endeavor comparable to building the interstate highway system in the 1950s and 1960’s, and encourage large scale projects – such as deploying fiber optic cable up the coast of western Alaska– that will link large geographic areas and thousands of rural residents to the fiber optic connectivity in Anchorage and beyond. In this manner, the ARRA can make a one-time capital investment that will make broadband available to a very large geographic swath of consumers, all of whom are currently unserved. Therefore, NTIA’s selection criteria should first fund fiber optic cable backbone facilities that can extend true broadband to the largest geographic area in rural Alaska that is now unserved.

“Unserved” should be defined to mean an area without any broadband service at all, or having access only to dial-up service or service that is dependent on a satellite. “Underserved” should mean an area with broadband service that is not comparable to what is available in urban areas.

Rural Alaska contains the most remote and isolated communities in the United States. Many of its villages and communities are, in some respects, still emerging from 3rd World conditions. Its teenage male suicide rates are alarmingly high, and are caused, in great part, by lack of job opportunities and the self-esteem that comes from hard work. In villages of 100 to 800 people, there are usually only a handful of paying jobs, with the result that unemployment in such areas routinely ranges from 20% to 90%. Rural Alaska has some of the highest poverty rates of any place in the Nation. There is nowhere else in America that faces the combination of such high unemployment, poverty, near absence of paying jobs, and geographic and telecommunications remoteness as rural Alaska . . . nowhere.

So many of ARRA’s goals would be achieved by the construction of a fiber optic backbone to serve rural Alaska, as it would provide access to all-weather, reliable, broadband service to consumers residing in essentially unserved areas of the United States; and provide broadband education and support to schools, libraries, medical and healthcare providers, university campuses in rural Alaska, and other community support organizations including tribal governments that provide vital social services to low-income, unemployed, aged and otherwise vulnerable populations. Additionally, and most critically, broadband would create jobs in areas where there are none - some of which would be immediate. Access to real broadband means that rural Alaska can for the first time effectively participate in the regional, state and national economies.

**DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration**

**DEPARTMENT OF AGRICULTURE
Rural Utilities Service**

In the Matter of)	
)	
American Recovery and Reinvestment Act)	Docket No. 090309298-9299-01
2009 Broadband Initiatives)	
)	

COMMENTS OF THE ALASKA FEDERATION OF NATIVES

These comments are prepared by the Alaska Federation of Natives (“AFN”). AFN is the largest umbrella organization for Alaska Natives. 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 certain 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.

In the comments below, AFN responds to the joint request of the National Telecommunications and Information Administration (“NTIA”) and the Rural Utilities Service (“RUS”). In order to establish the framework for its responses to the NTIA/RUS questions, AFN’s comments start with important background information. Alaska’s villages are exceedingly rural and remote. In fact, while Alaska is part of the United States, rural Alaska has only limited similarities with the 48 contiguous states in many respects.

The differences between rural Alaska and rural communities elsewhere in the United States are so stark and substantial that we suggest that a major federal investment will be required to adequately fund the construction of a fiber optic broadband pipe to the largest geographic area comprising rural Alaska. We believe that, considering the current lack of such infrastructure, the federal government’s moral responsibilities and trust relationship with and trust responsibilities to Native Americans, and the enormous potential of such infrastructure, such a major investment is fully justified and will promote the goals of the American Recovery and Reinvestment Act (“ARRA”). If such broadband infrastructure were built, rural Alaska would have, for the first time, real economic opportunities, and could participate in and, in time, significantly contribute to, the local, regional, state and national economies, while protecting a unique, but fragile, rural way of life that enriches our entire nation, its heritage and culture.

Background

A. Rural Alaska is Remote and Unique, and Broadband is Essential to Educational, Health Care, and Job Opportunities

1. Rural villages in Alaska are geographically remote from urban areas and are “rural” in every respect, as there are no interconnecting roads or genuine broadband connectivity on which to base employment, improved health care, and expanded educational opportunities.

It is important that decision makers have an appreciation for and an understanding of the uniqueness of rural Alaska. There are 231¹ federally recognized Alaska Native tribes. In rural Alaska, subsistence hunting, fishing and gathering is still a predominant way of life and provides a crucial means by which rural Alaskans put food on the table. Rural Alaska communities have the highest rates of poverty and unemployment of any group of people in America. Native villages and communities are not connected to each other by any road system, and, unlike the rest of the country, there are no major state highways or the interstate highway system.

In addition, unlike many communities in the lower-48, the Alaska Native villages are not served by any power grid systems for the purposes of distributing electricity. Power is produced locally, usually at great cost. Alaska Native Tribes, villages and communities are not connected with one another or the rest of the nation through high-speed, reliable broadband. In fact, rural Alaska villages are not even connected by road or by broadband with any major city in Alaska. They are isolated, remote, and face an exceedingly harsh and unforgiving climate and challenging terrain. The high-speed, fiber optic-based broadband-based service available to most of the American public in the lower-48 is simply not available in rural Alaska.

Internet and other telecommunications in rural Alaska are provided through satellite links.² Satellite service has a small throughput, and can barely handle audio streaming (much less video streaming), which is *essential* for robust and effective telemedicine, distance learning, and economic development. This is in sharp contrast to urban America, where reliable, state-of-the-art fiber optic allows for these applications directly or from hubs. In addition, not only is current satellite-based Internet service inadequate to handle today’s broadband applications as well as tomorrow’s, but also satellite links are prohibitively expensive. Non-health organizations in Alaska’s regional centers have been quoted prices for T1 connectivity as high as \$16,000 per month per site, or about 70 times the rate in Seattle. This is simply unaffordable.

¹ Department of the Interior, Bureau of Indian Affairs, “Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs, 73 Fed. Reg.18553-18557 (April 4, 2008). Almost half of the tribes in the nation are located in Alaska.

² Although individual satellite dishes are a partial solution for households and business that can afford them, these services are not available everywhere and they suffer deficiencies similar to those of other satellite-based systems. Alaska is at the edge of the coverage area for these providers. Even if this were not the case, because of limitations on upload rates, they are inadequate for web-based businesses, offices with multiple users, and other high-use consumers.

As the bandwidth demands of common web applications increase, rural Alaska is falling farther and farther behind the rest of the United States, whether the metric is jobs, education or health care. And, if this remains the case, rural Alaska will have no meaningful chance to participate in the global economy, educational or health care systems and will therefore be, absent some form of intervention such as the construction of fiber optic cable backbones, simply left behind as it has been for so long.

2. Distance Learning, Telemedicine, Economic Development

One of the supreme challenges facing rural Alaska is exposing youths and other residents to high quality and advanced educational opportunities. How that challenge is addressed will determine in large part the fate of rural Alaska and the fate of the cultures that are represented in remote regions of the State.

Native youths are graduating from high school at a rate of only 47%.³ Their drop-out rate is twice that of other students in the United States. Schools with Native enrollments greater than 80% often have the lowest proportion of schools meeting the Adequate Yearly Progress benchmarks under the No Child Left Behind Act, and the percent of Native students passing the reading, writing and math State of Alaska benchmark exams are below all other students in Alaska. This poor academic achievement cries out to be turned around.

It is only with fiber optic cable backbone that distance learning will have the quality, the throughput, and the capability to serve such a large area and so many people adequately. The youths who are able to advance themselves using the benefits of this technology hold the future of their villages in their hands and their minds.

Rural Alaskans need and deserve competent and improved quality health care that can be achieved through genuine fiber optic-based broadband installation. While telemedicine in rural Alaska has made strides in recent years, it remains problematic when based on satellite telemetry. Consequently, the quality of video, x-rays and other diagnostic scanning being sent other than by fiber optic cable is still not adequate enough to accomplish the job. If a rural Alaskan needs more care, in the absence of fiber optic cable-based telemedicine, his or her only option is to be medically evacuated by air at great cost to a major urban hospital many hundreds or more miles away.

Additionally, improvement of genuine broadband deployment in remote and rural Alaska villages would enable the U.S. Department of Veterans Affairs to deliver health care to the Alaska Native⁴ and non-Alaska Native veterans living in rural Alaska. Twenty percent of the

³ See Alaska Federation of Natives – 2008 Federal Priorities, at 6, found at <http://www.nativefederation.org/documents/AFN2008FederalPriorities.pdf> . The rest of the statistics in this paragraph are also from page 6 of AFN’s 2008 Federal Priorities.

⁴ It is well recognized that, historically, Native Americans including Alaska Natives, have the highest record of military service per capita when compared with other ethnic groups. More than 44,000 Native Americans, out of a total Native American population of less than 350,000, served with distinction between 1941 and 1945 in both the European and Pacific theaters of war. During the Vietnam era, more than 42,000 Native Americans, more than 90 percent of them volunteers, fought in Vietnam. Native American contributions in United States military

veterans in Alaska (14,400) live in remote communities and can be reached only by aircraft or boats. Of these 14,400 individuals who served our country, approximately half are Alaska Natives.⁵ Presently, there is no presence of the Department of Veterans Affairs in rural Alaska. If there were fiber optic broadband-based telemedicine in remote and rural parts of the state of Alaska, the VA might well be able to use Internet-based health care services to deliver the health care to veterans living in rural Alaska. The veterans have earned rights to this service by their service in the Armed Forces of the nation. This proposed caliber of broadband services could greatly advance the education and care for veterans in rural Alaska.

Rural Alaska has exceedingly high unemployment rates, characteristic of other communities in Indian Country. During the Congressional deliberations leading to the passage of ARRA, the Honorable Daniel K. Inouye, Chairman of the U. S. Senate Committee on Appropriations stated: “President Obama projects that in the near term, the nationwide unemployment rate could reach 10 percent. But for many of our Nation's First Americans, **an unemployment rate of 10 percent in their communities would signal a giant step forward**—given average unemployment rates in Indian country that range from 50 to 90 percent.”⁶ (Emphasis added).

Alaska Native unemployment rates in rural Alaska are many times the national unemployment rate. As a result, establishing new jobs, new economies, and new job opportunities is an imperative. Creation of economic development opportunities in remote and rural villages will lead to the creation of greater employment opportunities where few have existed. For all of these reasons, real broadband through a fiber optic cable backbone, coupled with state of the art microwave, Wi-Max or other advanced wireless extensions of such backbones, is critical to economic development in rural Alaska and holds great promise and potential for job creation.

B. NTIA Questions

AFN responds below to specific questions raised in the Request for Information.

4. *Establishing the Selection Criteria for Grant Awards.* The Recovery Act establishes several considerations for awarding grants under the BTOP. In addition to these considerations, NTIA may wish of course to consider other priorities in selecting competitive grants.

a. What factors should NTIA consider in establishing selection criteria for grant awards? How can NTIA determine that a Federal funding need exists and that

combat continued in the 1980s and 1990s as they served in Grenada, Panama, Somalia, and the Persian Gulf. Alaska Natives have continued this tradition in modern times, including service in Iraq and Afghanistan. When they return to their homes in rural Alaska, many of them need service-related medical care, and there is no Veterans Affairs Department presence in rural Alaska.

⁵ Annual Report of the Advisory Committee on Minority Veterans, United States Department of Veterans Affairs, at 9-10 (2007).

⁶ Statement of Senator Daniel K. Inouye Regarding the Economic Stimulus Bill, U. S. Senate Floor, February 2, 2009.

private investment is not displaced? How should the long-term feasibility of the investment be judged?

While the funding opportunities in ARRA for broadband deployment are very exciting, AFN is concerned that if this funding is distributed in grants that merely upgrade local networks on a piecemeal basis or make small adjustments to the existing satellite infrastructure system, an opportunity to make a giant step forward as United States Senator Inouye proposed, will be lost by this process and will continue to leave Alaska Natives at the top of the list of those impoverished and unemployed, with no hope of participating in the global economy.

NTIA and RUS should approach broadband deployment as a national endeavor comparable to building the interstate highway system in the 1950s and 1960's, and **encourage large scale projects** – such as deploying fiber optic cable up the coast of western Alaska, Interior Alaska, and elsewhere that this technology is absent, as well as the development or immediate upgrading of microwave networks that will link large geographic areas and thousands of rural residents to the fiber optic connectivity in Anchorage and beyond. In this manner, the ARRA can make a one-time capital investment that will make broadband available to a very large geographic swath of consumers, all of whom are currently unserved. Therefore, NTIA's selection criteria should first fund fiber optic cable backbone facilities that can extend true broadband to large geographic areas that are now unserved.

NTIA can easily conclude that private investment is not displaced by the fact that such a large geographic area is now unserved. If there were an opportunity for profit, private investment would have constructed a broadband network by now. However, the reason why private investment has not been made, and will not be made, is the upfront costs of constructing a backbone network to such a large geographic area with hundreds of rural villages. However, if the ARRA could fund this large capital investment, private investors would then be able to construct their own networks (such as microwave) interconnecting with the fiber optic, and to provide broadband service to schools, medical facilities, businesses and residents.

b. What should the weighting of these criteria be in determining consideration for grant and loan awards?

The NTIA should first make grant and loan awards to entities that will serve large geographic areas via fiber optic cable backbone systems that are capable of delivering high quality current video as well as next-generation broadband applications.

c. How should the BTOP prioritize proposals that serve underserved or unserved areas? Should the BTOP consider USDA broadband grant awards and loans in establishing these priorities?

BTOP's first priority should be proposals that serve unserved areas. Among unserved areas, BTOP should prioritize large geographic areas that are unserved. These areas, such as western Alaska, are the most costly and difficult to serve, and are the least likely to ever attract private investment without some government infrastructure investment first. Much as it took the federal Interstate Highway System to help bring economic growth to rural areas of the lower 48 states, here in rural Alaska, fiber optic cable backbones can serve a similar purpose a half century later.

BTOP should consider USDA broadband grant awards and loans in establishing these priorities. The two should work together to leverage grant funds in order to maximize the BTOP program's impact.

- e. *Should priority be given to proposals that address several purposes, serve several of the populations identified in the Recovery Act, or provide service to different types of areas?*

Priority should be given to proposals that can address as many of the Recovery Act's goals as possible, and funding of a fiber optic cable to western Alaska would achieve multiple goals of the ARRA. Such a cable would provide access to broadband service to consumers in unserved areas of the United States – rural Alaskans who are currently unserved. It would provide broadband education, awareness, training, access, equipment and support to our rural communities' schools, libraries, our health clinics and hospitals, and would provide Internet access in the rural campuses of the University of Alaska.⁷ It would provide broadband access to our tribal organizations that provide outreach, access equipment and support services to facilitate the use of broadband service by low-income, unemployed, aged and otherwise vulnerable populations.

A successful broadband deployment in remote and rural villages would have important economic effects, and at least one would be immediate – the economic development opportunities from opening up a global market for Alaska Native Arts and Craftsmen and Craftswomen. Alaska Native artwork is beautiful and depicts rural Alaska life, whether the artwork is Inupiat ivory carvings, Yupik or Aleut baskets, Athabascan beadwork, or Haida or Tsimshian crests.⁸ Alaska Native artwork includes both traditional and contemporary art. Currently, rural native artists, whose only source of income oftentimes is their artwork, have a limited selling audience because they cannot reliably market and sell their artwork via broadband connectivity since that is not available today. However, broadband connectivity will give Alaska Native Craftsmen and Craftswomen the ability to sell their artwork globally. This impact would be immediate and could have a significant impact in rural Alaska communities.

5. *Grant Mechanics:* The Recovery Act requires all agencies to distribute funds efficiently and fund projects that would not receive investment otherwise.

- a. *What mechanisms for distributing stimulus funds should be used by NTIA and USDA in addition to traditional grant and loan programs?*

Once these two agencies have decided on the grantees, NTIA and RUS could consider using the Denali Commission to help oversee and account for the expenditures of funds to Alaska recipients. Agency offices such as NTIA and RUS will have had a heavy burden thrust upon them without the staffing to absorb such large sums in such a short time period. Since the Denali Commission has played a similar role in its work, it may, for Alaska, help alleviate the challenging task faced by the NTIA and RUS.

⁷ <http://www.alaska.edu/active/about-ua/>

⁸ http://www.dced.state.ak.us/oed/student_info/learn/nativearts.htm

6. *Broadband Mapping.* The Recovery Act directs NTIA to establish a comprehensive nationwide inventory map of existing broadband service capability and availability in the United States that depicts the geographic extent to which broadband service capability is deployed and available from a commercial provider or public provider throughout each State.

a. *What uses should such a map be capable of serving?*

b. *What specific information should the broadband map contain, and should the map provide different types of information to different users (e.g., consumers versus governmental entities)?*

Ideally, as such a map is developed, the map should show whether broadband is available in a community at all, and if broadband is available, the technology provided and whether it is available throughout a community, including consumers and governmental entities, and from whom.

As part of this mapping process, NTIA might consider asking the various state agencies, such as the Alaska Department of Commerce, Community & Economic Development, Alaska Department of Education and Early Development, Alaska Department of Health & Social Services, Alaska Department of Military & Veterans Affairs, and the University of Alaska, if they have conducted some form of broadband mapping for the purposes of carrying out their responsibilities for the citizens of Alaska who live in rural Alaska. In addition, nonprofit and health care service providers should also be consulted to determine if they have carried out some form of broadband mapping.

7. *Financial Contributions by Grant Applicants.* The Recovery Act requires that the Federal share of funding for any proposal may not exceed 80 percent of the total grant. The Recovery Act also requires that applicants demonstrate that their proposals would not have been implemented during the grant period without Federal assistance. The Recovery Act allows for an increase in the Federal share beyond 80 percent if the applicant petitions NTIA and demonstrates financial need.

a. *What factors should an applicant show to establish the “financial need” necessary to receive more than 80 percent of a project's cost in grant funds?*

ARRA mandates that the Federal share of funding for any proposal may not exceed 80% of the total project requirement, unless approved by the NTIA. This is going to be the greatest impediment for any grant applicant from rural Alaska, where, ironically, the need for successful broadband deployment is the greatest. AFN proposes that “financial need” is demonstrated where the area to be served has an unemployment rate of 20% or greater and poverty rates well in excess of national averages along with low availability of jobs. In that event, the matching requirement should be waived by those applying for ARRA Broadband funds. For people living with such high poverty rates, unemployment rates, and lack of jobs, such matching requirements are tantamount to telling potential beneficiaries that their time **will never come** . . . and that they are destined to live as they do now with no relief in sight.

8. *Timely Completion of Proposals.* The Recovery Act states that NTIA shall establish the BTOP as expeditiously as practicable, ensure that all awards are made before the end of fiscal year 2010, and seek assurances from grantees that projects supported by the programs will be substantially completed within two (2) years following an award. The Recovery Act also requires that grant recipients report quarterly on the recipient's use of grant funds and the grant recipient's progress in fulfilling the objectives of the grant proposal. The Recovery Act permits NTIA to de-obligate awards to grant recipients that demonstrate an insufficient level of performance, or wasteful or fraudulent spending (as defined by NTIA in advance), and award these funds to new or existing applicants.

b. What elements should be included in the application to ensure the projects can be completed within two (2) years (e.g. timelines, milestones, and letters of agreement with partners)?

The BTOP program should recognize that, although a plan to deploy broadband to rural Alaska should be realistically designed to meet the statutory requirements, Alaska's unique geography, climate and lack of infrastructure could present unforeseen challenges. Since there are no interconnecting roads between the metropolitan and rural Alaska, the most cost-effective means of delivering material and goods that may be needed for broadband deployment in rural Alaska is by ships and barges during the months of June, July, August and September in western Alaska for instance. Further north, transportation by ships and/or barges has an even shorter time frame each year.

Most of the communities in rural Alaska do not have ports to which material and goods can be delivered. NTIA should take into consideration the short season for the delivery of material and goods that will be needed in broadband deployments in rural Alaska in addressing the timeliness of the completion of the construction of a new fiber optic backbone. Furthermore, there are limited construction periods in rural Alaska that could impact the construction of marine and terrestrial broadband facilities. The benefits of a broadband deployment in rural Alaska will be paid back many fold in bringing jobs, education, and health care on a real-time basis to the entire region, which will provide the foundation for real and sustained economies in rural villages.

9. *Definitions:* The Conference Report on the Recovery Act states that NTIA should consult with the FCC on defining the terms "unserved area," "underserved area," and "broadband." The Recovery Act also requires that NTIA shall, in coordination with the FCC, publish nondiscrimination and network interconnection obligations that shall be contractual conditions of grant awards, including, at a minimum, adherence to the principles contained in the FCC's broadband policy statement (FCC 05-15, adopted August 5, 2005).

a. For purposes of the BTOP, how should NTIA, in consultation with the FCC, define the terms "unserved area" and "underserved area?"

"Unserved" should be defined to mean an area without any broadband service at all, or having access only to dial-up service or service that is dependent on a satellite connection. "Underserved" should mean an area with broadband that is not comparable to what is available in urban areas.

Additional Comments:

As the Request for Information acknowledges, ARRA makes funding through the BTOP available to all Indian tribes in the country, including those located in Alaska. As the NTIA and RUS develop the BTOP, which will necessarily affect all tribal communities throughout the United States, federal agencies have an obligation to consult with the tribes pursuant to Executive Order 13175, which reinforces the government-to-government relationship with the federally recognized Indian tribes:

[I]n order to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes...

(c) When undertaking to formulate and implement policies that have tribal implications, agencies shall: (1) encourage Indian tribes to develop their own policies to achieve program objectives; (2) where possible, defer to Indian tribes to establish standards; and (3) in determining whether to establish Federal standards, consult with tribal officials as to the need for Federal standards and any alternatives that would limit the scope of Federal standards or otherwise preserve the prerogatives and authority of Indian tribes.⁹

Conclusion

Rural Alaska contains the most remote and isolated communities in the United States. Many of its villages and communities are, in some respects, still emerging from 3rd World

conditions. Its teenage male suicide rates are alarmingly high caused, in great part, by lack of job opportunities and the self-esteem that comes from hard work. In villages of 100 to 800 people, there are usually only a handful of paying jobs with the result that unemployment in such areas routinely ranges from 20% to 90%. Rural Alaska has some of the highest poverty rates of any place in the Nation. There is nowhere else in America that faces the combination of such high unemployment, poverty, near absence of paying jobs, and geographic and telecommunications remoteness . . . nowhere.

Health care delivery in rural Alaska is more challenging than anywhere else in the nation. This is because of rural Alaska's remoteness as well as the lack of roads and affordable transportation to properly equipped and manned hospitals and clinics. The result is that telemedicine for this region is critical ... except rural Alaska doesn't currently have access to the kinds of telemedicine delivery systems that it needs.

Our people have lived in this region for countless centuries. If the U.S. is to bring the entire nation into the 21st Century, it would be tragic to leave the Nation's first peoples in the dark ages. They deserve the same opportunities provided to those in the rest of the Nation.

Broadband capability will not, by itself, ensure that the many health, social, and economic challenges that people face in the most rural and remote region of our nation will be

⁹ *Id.*

resolved overnight. However, reliable, robust, all-weather broadband *alone* holds the *most promise* for making a “sea change” in terms of the opportunities that are so acutely needed and that this technology can help provide.

So many of ARRA’s goals would be achieved by the construction of a fiber optic backbone to serve rural Alaska, as it would provide access to broadband service to consumers residing in essentially unserved areas of the United States; provide broadband education and support to schools, libraries, medical and healthcare providers, university campuses in rural Alaska, and other community support organizations including tribal governments that provide vital social services to low-income, unemployed, aged and otherwise vulnerable populations. And, critically, broadband would create jobs, and some of these would be immediate. Access to real broadband means that rural Alaska will be connected to the global economy, and can participate in the economy and contribute to that economy, for the first time.

We strongly urge that the NTIA fully consider AFN’s views and incorporate them into the guidelines that you provide.

Thank you for your consideration. If you have any questions concerning our response, please call me at 907-274-3611.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nelson N. Angapak, Sr.', written in a cursive style.

Nelson N. Angapak, Sr., Vice President
Alaska Federation of Natives