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November 28, 2016

Commissioner Clyburn Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Dear Commissioner Clyburn:

Commissioner Clyburn, thank you for the opportunity to speak at your Solutions2020 Policy Forum, and for this opportunity to address telecommunications issues facing Indian Country. The FCC must ensure that Indian Country is treated fairly, and that Native Americans are allowed a seat at the table the rest of America enjoys. Here are specific recommendations for achieving that goal.

Establish a Tribal Priority for Spectrum: As the FCC's Tribal Policy Statement recognized in 2000, spectrum for Indian Country is a paramount resource. Yet sixteen years later, Tribes still desperately need spectrum. In order to deliver spectrum to Indian Country, the FCC should establish a Tribal Priority where tribal applicants for spectrum to serve Tribal Lands will receive heightened consideration.

Engage in Meaningful Consultation with Tribes: Tribal governments deserve respect. Commendably, the FCC has reached out to Indian Country with the creation of the Office of Native Affairs and Policy, yet ONAP does not have its own budget or a direct line to the Commissioners. To focus on meaningful consultations with the tribes, ONAP should have financial security, not an annual struggle for a budget. The FCC and ONAP must also focus on engaging Tribes in a proactive matter. The Commission must consult Tribes when shaping regulations, rather than explaining regulations after-the-fact.

Establish Planning and Infrastructure Grants: High cost reforms adopted by the Commission must include Indian Country. The Lifeline and Linkup programs have had positive effects on Indian Country; however their focus is on affordability rather than infrastructure. Tribes simply do not have the financial and expertise required for the FCC's subsidy programs, such as Rural Health Care or E-Rate. Without the FCC's help, both through technical assistance and the creation of grants that allow funds to be spent on planning and consultation, these subsidy programs will remain available to Tribes only in theory. Finally, the Commission should adopt rules implementing the Tribal Broadband Factor, based on a proposal

submitted by the NTTA, that establishes a dedicated source of funding for investment in broadband infrastructure on Tribal lands.

In gratitude,

Loris Taylor

President & CEO

Native Public Media, Inc.

Louis Saylor