

## DOI SELF-GOVERNANCE ADVISORY COMMITTEE

c/o Self-Governance Communication & Education Tribal Consortium  
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June 29, 2020

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
455 12<sup>th</sup> Street, SW  
Washington, DC 20554  
ATTN: Matthew Berry, Chief of Staff

### **RE: Urge Extension of the Tribal Priority Filing Window for the 2.5GHz Band over Tribal Lands and Start of the Rural Digital Opportunity Fund (auction) by 180 Days**

Dear Chairman Pai:

On behalf of the Self-Governance Advisory Committee (SGAC), representing more than 270, or nearly 50%, of all Federally Recognized Tribes in the United States, I write in support of the Congressional Native American Caucus and the National Congress of American Indians letters, dated April 9<sup>th</sup> and April 22<sup>nd</sup> respectively, to urge the Federal Communications Commission (FCC) to extend the **“Tribal Priority Filing Window for the 2.5GHz Band over Tribal Lands until January 2021”** and **“Start of the Rural Digital Opportunity Fund (auction) by 180 days”**.

In the Administration’s “All of Government” approach to eradicate the COVID-19 virus, Tribal Governments are on the front lines working tirelessly to combat the pandemic. However, despite Tribal Government efforts, the health crisis, infection rate, and death toll due to the COVID-19 virus, continue to rise in Indian communities across the United States. American Indians/Alaska Natives (AI/AN) are disproportionately impacted by the pandemic due to chronic structural, economic, and health inequalities. These factors are compounded further with, overcrowded housing, understaffed hospitals, lack of running water, and years of chronic underfunding of Tribal health care systems which has resulted in higher rates of diabetes, heart disease, chronic liver disease, chronic lower respiratory disease, and other high risk health issues that place AI/AN individuals at greater risk for severe illness from COVID-19 compared to other populations.

Many Tribes are also dealing with the brunt of the economic downturn as they voluntarily closed their Tribal businesses to protect the health and welfare of their citizens and the surrounding communities. These business revenues are an economic lifeline to Tribes who for years have dealt with chronic underfunding by the Federal government and the inability to generate tax revenue to support essential Tribal government services, such as, healthcare, education, and public safety. Revenue that is generated by Tribal businesses fund essential government programs and operations and with the complete shutdown of Tribal businesses, Tribes have dedicated all of their resources to combating the COVID-19

pandemic and responding to the day-to-day health and safety needs of their citizens. As a result, opportunities such as the 2.5GHz Tribal priority filing window and the Rural Digital Opportunity Fund have been temporarily sidelined in order for Tribes to devote resources and attention to the health and welfare crisis at hand.

Given the extraordinary circumstances impacting Tribal communities, we urge the FCC to reconsider their current timelines and authorize an extension of the Tribal priority filing window and the start date for the Rural Digital Opportunity Fund. This historic opportunity for Tribes to bridge the digital divide is too important to Tribal governments and would put them in an unreasonable position of having to decide between an economic opportunity or the health and welfare of their citizens and community.

We urge the FCC to consider the widespread and disproportionate impact of COVID-19 on Tribal governments and be considerate of the critical need for broadband and other wireless services in Tribal communities. Technology will continue to change the way we work, live, and survive in the coming decades. ***We ask that you extend the deadlines to allow Tribal governments to fully partake in these life-changing opportunities that will benefit their citizens, surrounding communities and afford Tribes equitable opportunities to join the technology grid!***

Thank you for consideration of our request. Please don't hesitate to contact me at 206-369-6699 or via email at [rallen@jamestowntribe.org](mailto:rallen@jamestowntribe.org).

Sincerely,



W. Ron Allen, Tribal Chairman/CEO, Jamestown S'Klallam Tribe and  
Chairman, Self-Governance Advisory Committee, Department of the Interior

Cc: Tara Mac Lean Sweeney, Assistant Secretary Indian Affairs, DOI  
SGAC Members  
National Congress of American Indians