



National Tribal Broadband Strategy

January 15, 2021



National Tribal Broadband Strategy

Developed by the U.S. Department of the Interior, Indian Affairs

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U.S. Department of Commerce, National Telecommunication and Information Association

U.S. Department of Agriculture

U.S. Federal Communications Commission

Institute of Museum and Library Services

U.S. Department of Education

White House Office of Science and Technology Policy

White House Office of Management and Budget

White House Council on Native American Affairs

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EXECUTIVE SUMMARY

From the deserts of New Mexico and Arizona to the plains of the upper Midwest and the tundra of Alaska, Native Americans are being left behind in the digital revolution. In January 2018, President Trump issued Executive Order (EO) 13821, *Streamlining and Expediting Requests to Locate Broadband Facilities in Rural America* and a Presidential Memorandum to the Secretary of the Interior entitled, *Supporting Broadband Tower Facilities in Rural America on Federal Properties Managed by the Department of the Interior*. These documents establish federal policy “to use all viable tools to accelerate the deployment and adoption of affordable, reliable, modern high-speed broadband connectivity in rural America, including rural homes, farms, small businesses, manufacturing and production sites, Tribal communities, transportation systems, and healthcare and education facilities.”¹ Reliable, high-speed internet has become a staple of twenty-first century life for Americans across the country. Healthcare, education, entertainment, public safety, entrepreneurship, agriculture and many other industries are all increasingly dependent on broadband. And while over 99 percent of the population in urban areas has access to broadband service meeting a 25/3 Mbps speed threshold, only approximately 65 percent of the population on rural Tribal lands has that same access as of the end of 2019.² Insufficient service on Tribal lands not only inhibits individuals’ access to education, healthcare, and economic resources, but, also, impedes Tribes’ efforts to achieve self-governance and self-determination.

The barriers to Tribal broadband deployment are varied and can be found across sectors. From a lack of financial investing in Tribal communities and the immense geography in question to complex and burdensome regulatory environments, the U.S. Department of the Interior’s (DOI) Office of Indian Energy and Economic Development (IEED) has identified seven fundamental barriers to deployment:

- lack of coordination,
- insufficient data,
- missing building blocks,
- insufficient funding,
- complex permitting,
- low adoption, and
- weak connection to economic development.

Building on the President’s efforts, in 2018 DOI released the *Connectivity in Rural America* report identifying several strategies to directly improve the deployment of rural broadband infrastructure on public holdings by making it easier for private industry to collocate or build new broadband infrastructure on public lands. The Bureau of Indian Affairs (BIA) is updating the

Figure 1. Seven Barriers to Deployment



¹ EO 13821

² Federal Communications Commission. 2020 Communications Marketplace Report. FCC-20-188. (Washington, D.C., 31 December 2020), 160.

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Rights of Way and Business Leasing Handbooks to ensure up-to-date guidance is provided to all Realty Officers across the Nation while also working to enhance transparency and improve information sharing with industry on proposed projects. BIA is enhancing the Office of Trust Services workforce through new hiring, Workforce Plan initiatives, and increased training. The BIA is also working to streamline environmental reviews with a new drafted categorical exclusion and data standards, develop a national fair market value rental rule and new calculation process, and facilitate meetings between project applicants and trust landowners.

The Bureau of Indian Education (BIE) is also working to enhance broadband access for students. To date, 87 of a total 91 BIE-funded K-12 schools on the ENAN II network have upgraded their networks to 100 Mbps; the four remaining schools are expected to be upgraded in 2021. In 2020, BIE executed a pilot program to install Wi-Fi on buses serving the 25 longest bus routes among BIE schools, enabling students to access the internet for homework and additional learning opportunities on their commute to and from school.

The National Tribal Broadband Strategy (Strategy) is a proposed roadmap for action and investment by the Federal Government in broadband access and adoption for American Indian and Alaska Native (AI/AN) communities with the aim of eliminating the AI/AN connectivity gap. The Strategy is grounded in research and recommendations from government, academia, and industry and informed by comments from Tribal Leaders and subject matter experts in various forums, including congressional testimony, the National Tribal Broadband Summit, and a virtual listening session on Tribal Broadband held on September 24, 2020. The Strategy builds and expands on the work of the American Broadband Initiative (ABI) workstreams on Federal Funding, Permitting, and Leveraging Federal Assets. Previous efforts to expand broadband networks in Tribal areas have resulted in significant progress over the last several years; however, much work remains to be done.

IEED's recommendations are grouped into seven strategies for development designed to directly address each of the barriers identified above:

- **Coordination:** Grow a Community of Practice
- **Data:** Improve Data Collection, Analysis, and Reporting
- **Network Building Blocks:** Expand Backhaul, Middle Mile, and Spectrum Resources
- **Funding:** Promote Public and Private Investment
- **Permitting:** Reduce Complexity and Delays
- **Adoption:** Bring Broadband into Homes and Businesses
- **Economic Development:** Leverage Broadband for Greater Impact

Figure 2. Seven Strategies for Development



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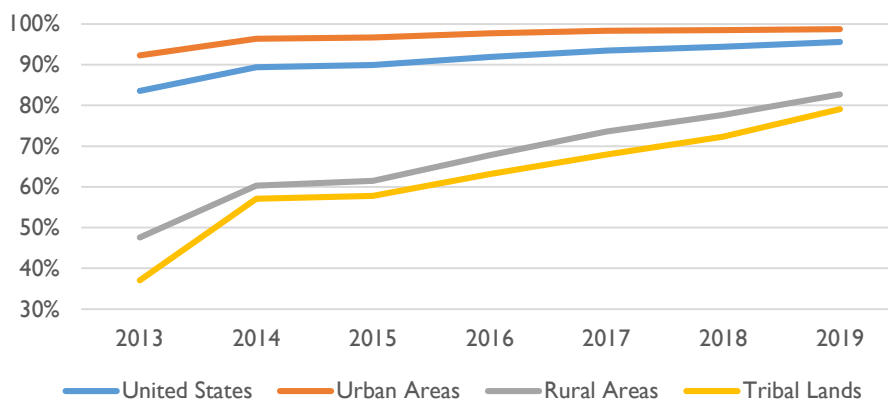
The ecosystem for Tribal broadband development includes more than 20 federal agencies; hundreds of local and national internet service providers; State, local, and Tribal governments; libraries and cultural centers; banks; community financial development institutions; advocacy groups; and many others. The lack of coordination and communication among these disparate entities, or even solely within the Federal Government, has been cited as a critical barrier to success for Tribal broadband projects.³ We aim to build on the success of the ABI in coordinating efforts to drive rural broadband development by bringing a specific focus on Tribal needs.

Achieving this vision will require a whole-of-government response, strategically bringing several federal agencies together with Tribal, State, and local governments, and the private sector. Within the Federal Government, the primary agencies involved in broadband deployment and adoption activities for tribes include: Department of Agriculture (USDA), Department of Commerce (USDOC), Department of Education (ED), Department of the Interior (DOI), the Federal Communications Commission (FCC), the Institute of Museum and Library Services (IMLS), and the White House Office of Science and Technology Policy (OSTP).

BROADBAND DEPLOYMENT AND ADOPTION IN TRIBAL AMERICA

Broadband deployment on Tribal lands has seen significant improvement since 2013. The percentage of individuals with fixed terrestrial broadband access has more than doubled in that time. Unfortunately, development on Tribal lands continues to lag behind other areas. As shown in the table below, Tribal lands are 20 percentage points behind urban areas, and there is a persistent gap of 4 to 6 percent each year from 2014 to 2019 between broadband deployment on Tribal lands versus non-Tribal rural areas.⁴ This assessment likely underestimates the connectivity gap for rural Tribal communities as the definition of “Tribal Lands” Figure 3⁵ below since it includes Tribal land boundaries in both urban and rural areas.

Figure 3. Deployment of Fixed Terrestrial 25/3 Mbps Services



³ U.S. Department of Commerce. National Telecommunications and Information Administration. *American Broadband Initiative, Milestones Report*. (Washington, D.C., 2019), 29.

⁴ Federal Communications Commission. *2020 Broadband Deployment Report*. FCC-20-50. (Washington, D.C., 24 April 2020), 19.

⁵ Chart derived from data in the FCC 2018, 2019, and 2020 *Broadband Deployment Reports*, and the FCC *2020 Communications Marketplace Report*.

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The ABI has identified several factors driving the persistent disparity in access between urban and rural communities:

First, the lower density of homes and businesses in rural settings means that more infrastructure is necessary to provide high-speed Internet services, increasing the “unit cost,” or cost per customer served. Additionally, the lower density means that more land is crossed to erect broadband infrastructure, increasing the acquisition, permitting, and easement requirements, especially in Western states. This dispersed development also means that each connected place bears a higher proportion of the ongoing operating costs. These factors increase costs for rural broadband construction and operation, resulting in higher service charges, and making broadband service less affordable for rural customers.⁶

The effects of these factors increasing costs for rural broadband are magnified in Tribal areas which often have even lower population density than non-Tribal rural areas and exist in a more complex permitting environment. Tribal trust and restricted lands⁷ have unique permitting challenges that can deter private investment.

The goal of the National Tribal Broadband Strategy is to eliminate the digital divide between Tribal and non-Tribal communities across the country. This document outlines 28 recommended actions that agencies should take to help address this digital divide. It is important to note that some of the recommended actions will require Tribal consultation, inter-agency consultation, legislation and other approvals before they can be implemented.

NEXT STEPS AND CONSIDERATIONS

IEED intends to use the National Tribal Broadband Strategy as a policy springboard for coordinated inter-agency action to close the digital divide for Tribal communities. Over the coming year, IEED aims to lead discussions on the Strategy with federal agencies, Tribes, Tribal organizations, and the private sector to identify resources, policy proposals, and strengthen coordination among stakeholders. The Strategy creates a policy framework and contains several specific recommendations for federal agencies to promote and achieve greater broadband access for Tribes. The next stage of the initiative, however, is perhaps the most important: securing long-term commitments from federal partners to work closely with IEED on making identifiable gains on Tribal connectivity issues. This can be done through MOUs or other inter-agency agreements and through organizing bodies like the White House Council on Native American Affairs. And, of course, IEED will continue its effort and outreach to Tribes to help guide the work of closing the digital divide in Indian Country and Alaska Native communities.

⁶ NTIA, *American Broadband Initiative*, 11.

⁷ Trust or restricted lands: any tract, or interest therein, held in trust or restricted status. Trust or restricted status means: (1) That the United States holds title to the tract or interest in trust for the benefit of one or more tribes or individual Indians; or (2) That one or more tribes or individual Indians holds title to the tract or interest, but can alienate or encumber it only with the approval of the United States because of limitations in the conveyance instrument under Federal law or limitations in Federal law.

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COORDINATION: GROW A COMMUNITY OF PRACTICE

Activity 1: Create a Broadband Development Program within IEED, Division of Economic Development

Administrative

To begin, the DOI proposes to create a new Broadband Development Program (BDP) within IEED to implement the National Tribal Broadband Strategy and coordinate efforts within and beyond Indian Affairs (IA) to drive Tribal broadband development. The BDP would focus on the macro, foundational elements necessary to support and facilitate Tribal broadband development, and work to share findings with a community of practice including federal, State, local, Tribal, and private stakeholders. Proposed activities include:

- Administer the National Tribal Broadband Grant (NTBG);
- Provide technical assistance to tribes seeking to develop or enhance their own broadband programs;⁸
- Conduct network analyses of programs, funders, and other resources;
- Foster partnerships among federal, state, local, and Tribal governments, and the private sector;
- Support Tribal consultation and engagement efforts;⁹ and
- Facilitate increased discussion and information sharing among stakeholders; and,
- Establish a forum for discussion and information sharing among tribes, private industry, schools and other stakeholders.¹⁰

The BDP would be a technical assistance program, including funding opportunities for tribes to build local capacity in navigating project management aspects of securing high-capacity broadband for their communities, including through libraries and schools, covering partnerships and collaborations. The BDP would complement the work of existing technical assistance programs, such as BroadbandUSA through specialized programming for Tribal Nations, building on DOI's existing relationships with Tribal governments and the BIA's role in permitting for telecommunications projects on Tribal lands.

⁸ Government Accountability Office. "Telecommunications: Additional Coordination and Performance Measurement Needed for High-Speed Internet Access Programs on Tribal Lands. GAO-16-222. (Washington, D.C., 2016), 14-15.; Brake, Doug. *A Policymaker's Guide to Rural Broadband Infrastructure*. Information Technology & Innovation Foundation. Retrieved from http://www2.itif.org/2017-rural-broadband-infrastructure.pdf?_ga=2.34140323.385965194.1586962000-732484846.1586962000. (2017), 15.

⁹ Howard, Brian and Traci Moris. "Tribal Technology Assessment: The State of Internet Service on Tribal Lands." TPRC47: The 47th Research Conference on Communication, Information and Internet Policy, 2019. Available at SSRN: <https://ssrn.com/abstract=3427547> or <http://dx.doi.org/10.2139/ssrn.3427547>. (2019), 43.

¹⁰ *Ibid.*, 45.

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Activity 2: Convene the Annual National Tribal Broadband Summit

Administrative

The BDP, in coordination with inter-agency partners, proposes to continue hosting the annual National Tribal Broadband Summit¹¹ to connect community leaders with information and resources to identify opportunities for public and private sector solutions to close the connectivity gap in communities, schools, and libraries on Tribal lands. This Summit provides a platform for leaders across the broadband development ecosystem to share best practices, new ideas, and lessons learned from their real-world experience bringing high-speed internet to Native American homes, businesses and community institutions.

Activity 3: Establish a Tribal Broadband Workstream under the American Broadband Initiative

Administrative

The National Telecommunications and Information Administration (NTIA) should explore whether it is appropriate to establish a new workstream of the ABI on Tribal Broadband, chaired by DOI and in conjunction with NTIA's existing inter-agency processes. The workstream participants could identify and coordinate federal resources and technical expertise for high-speed broadband deployment on Tribal land. The Tribal Broadband Workstream would look specifically for barriers to access resources for Tribal communities and develop recommendations to address these issues and serve as a forum for agencies to share information about their relevant initiatives, best practices, and current projects. Specifically, the working group would investigate and recommend options to increase engagement and coordination with states and with the private sector.

Activity 4: Establish a Tribal Broadband Leaders Network

Administrative

A foundation of the NTIA's BroadbandUSA program is the State Broadband Leaders Network (SBLN), a group of State government officials that focus on State-level broadband efforts and State-level digital inclusion efforts. NTIA should collaborate with IEED to establish a similar cohort, the Tribal Broadband Leaders Network (TBLN). This network would create a space for capacity building, peer learning, as well as promote the availability and meaningful use of broadband. As with NTIA's SBLN, the TBLN would invite members of the ABI workstreams to participate in TBLN meetings as needed, and vice versa, to discuss barriers and potential solutions. In addition, NTIA's leadership of the TBLN would allow for coordination with the SBLN as appropriate.

¹¹ Additional information on the National Tribal Broadband Summit is available at doi.gov/tribalbroadband.

DATA: IMPROVE DATA COLLECTION, ANALYSIS & REPORTING

Activity 5: Continue Development of the Inventory of Federal Telecommunications Assets (JOEL Map)

Administrative

The BIA proposes to continue collaborating with the Bureau of Land Management on the existing JOEL Map of Federal Telecommunications Sites and Infrastructure (JOEL Map) to provide more refined data and more accurate mapping of infrastructure on Tribal trust lands. The BDP would coordinate efforts with the BIA Office of Trust Services to refine permitting data from the Trust Asset and Accounting Management System for this purpose.¹²

Activity 6: Improve Tribal Broadband Availability Data

Administrative

NTIA should continue development of the National Broadband Availability Map (NBAM). The NBAM project should include a specific focus on mapping broadband availability on Tribal lands. The NBAM is a secure, cloud-based Geospatial Information System (GIS) platform for the visualization and comparison of federal, State, and commercially available data sets. This tool can help identify regions with insufficient service, compare multiple datasets to identify discrepancies in broadband availability (e.g. served vs. underserved or unserved), and produce reports and analyses that could be used for broadband policy, planning, and investment decision-making.

Activity 7: Improve the Accuracy of Broadband Deployment Data

Regulatory

IEED proposes to work with the FCC on modernizing the collection of data on fixed broadband and mobile wireless service coverage in Tribal areas in its ongoing Digital Opportunity Data Collection proceeding, for increased accuracy and detail. The FCC's effort includes establishment and enhancement of data validation policies and procedures, allowing Tribes and individual consumers to challenge broadband availability data, and holding annual workshops in each of the 12 BIA regions to provide technical assistance to Tribes for collection and submission of broadband coverage data.¹³

Activity 8: Collect and Disseminate Data on Tribal Libraries and Broadband Availability and Use

Administrative

IMLS, in coordination with the FCC, should leverage its authority to collect and report on data to enhance understanding of the availability and use of broadband by Tribal libraries and related Tribal cultural organizations. IMLS, in collaboration with the FCC, should gather public input from libraries that do not currently participate in the E-Rate program to identify challenges and potential opportunities.

¹² NTIA, *American Broadband Initiative*, 21.

¹³ Howard and Moris. "Tribal Technology Assessment," 44.; Federal Communications Commission. Establishing the Digital Opportunity Data Collection, Second Report and Order and Third Further Notice of Proposed Rulemaking, FCC 20-94. (Washington, D.C., 16 July 2020).

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Activity 9: Consolidate Information in Easy-to-Find and Easy-to-Use Spaces

Administrative

The BDP, in collaboration with NTIA, should develop, implement, and enhance centralized information resources for Tribes, including information on funding opportunities, permitting, and other critical information. This effort would expand Tribal-specific information on the existing [BroadbandUSA website](#) and the IEED portal. NTIA and the BDP should also explore development of joint content and information products specific to Tribal nations.¹⁴

Activity 10: Conduct an Assessment of Barriers to Access among Native Communities

Administrative

IEED proposes to enter into a Memorandum of Understanding (MOU) with the NBAM Program at NTIA to conduct an analysis of barriers to access to broadband services in Tribal areas. This will include geospatial databases with data on broadband availability and use. The BDP would analyze the data to infer barriers to access (e.g., available service is too costly, no middle-mile connection to the community, limited last-mile build out within the community, etc.) to inform the development of targeted interventions and recommendations for improving access within specific communities.

Because the NBAM contains proprietary data, NTIA would make data layers acquired from third-party sources available to IEED consistent with the confidentiality agreements between NTIA and these entities. Upon execution of the MOU, NTIA would establish user accounts and provide training materials to IEED. IEED would identify relevant data about Tribal lands and work with NTIA to integrate data into the NBAM platform, as appropriate. NTIA would provide appropriate guidance to IEED to support this data collection to ensure consistency with other interagency efforts underway, and to facilitate integration into the NBAM.

NETWORK BUILDING BLOCKS: EXPAND BACKHAUL, MIDDLE MILE & SPECTRUM RESOURCES

Activity 11: Increase Tribal Access to Spectrum

Regulatory and/or Legislative

The ABI should collaborate with the FCC to explore specific mechanisms to increase Tribal access to and use of spectrum including:

- Considering, where feasible, a Tribal priority window for FCC proceedings involving Tribal lands,
- Assisting eligible Tribal entities with applying to participate in any Tribal priority window created for accessing unassigned spectrum over rural Tribal lands,
- Continuing to make Tribal Lands Bidding Credits available to spectrum auction winners who provide service to qualifying Tribal lands,

¹⁴ NTIA, *American Broadband Initiative*, 28.

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- Considering policies to encourage commercial licensees to disaggregate, partition, or lease unused licenses over Tribal lands, and
- Strengthening spectrum buildout requirements for newly allocated spectrum bands and enforcing buildout requirements for previously allocated spectrum bands.¹⁵

In addition, the ABI should work with the FCC, DOI, and USDA to conduct Tribal consultation and work on the implications of aligning the definition of “Tribal lands” across agencies.¹⁶

Activity 12: Make Federal Infrastructure Available for Private Use

Regulatory

The ABI should work across all workstreams to identify opportunities and develop action plans to make federally owned and managed telecommunications infrastructure available for broadband development.¹⁷ This will build on existing ABI activities, including:

- Assessing the viability of leasing dark fiber from the U.S. Department of Energy,¹⁸ and
- Harmonizing policies that govern access to federal agencies.

Activity 13: Develop Plans for Middle-Mile Networks in Unserved and Underserved Areas

Administrative

Based on the data analysis described in Activity 10 and the expanded access to network building blocks deriving from Activities 11 and 12, the IEED proposes to work with NTIA, the FCC, and USDA to investigate funding and deployment of middle-mile infrastructure to unserved and underserved Tribal communities.¹⁹

FUNDING: PROMOTE PUBLIC AND PRIVATE INVESTMENT

Activity 14: Resolve Barriers to Access Universal Service Fund Programs

Regulatory and Legislative

The ABI should continue to work with the FCC and Congress to identify barriers to access Universal Services Funds (USF) for tribes and develop recommendations to resolve those barriers, including considering whether to change or eliminate the Eligible Telecommunications Carrier (ETC) designation requirements for Tribal lands.²⁰ Current FCC actions include:

¹⁵ Native Nations Communications Task Force. *Improving and Increasing Broadband Deployment on Tribal Lands*. Report to the Federal Communications Commission. (Washington, DC, 5 November 2019), 11, 17, 37-39.; Howard and Moris. “Tribal Technology Assessment,” 43.; Federal Communications Commission. “Improving Communications Services for Native Nations by Promoting Greater Utilization of Spectrum over Tribal Lands.” *Notice of Proposed Rulemaking*. WT Docket No. 11-40. FCC-11-29. (Washington, D.C., 3 March 2011).

¹⁶ NNCTF, *Improving and Increasing Broadband Deployment*, 38.

¹⁷ NTIA, *American Broadband Initiative*, 22.

¹⁸ U.S. Department of Energy. Office of Energy. *Fiber Optics Feasibility Assessment: Western Area Power Administration and Southwestern Power Administration*. (Washington, D.C., 25 June 2020).

¹⁹ Native Nations Communications Task Force, *Improving and Increasing Broadband Deployment*, 22.; NTIA, *American Broadband Initiative*, 30.

²⁰ Government Accountability Office. *Tribal Broadband: Few Partnerships Exist and the Rural Utilities Service Needs to Identify and Address Any Funding Barriers Tribes Face*. GAO-18-682. (Washington, D.C., 2018), 19.; NNCTF, *Improving and Increasing Broadband Deployment*, 37.

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- Seeking comment on adjusting legacy rate-of-return carrier support levels to better reflect the unique and higher costs of serving Tribal lands,²¹ and
- Prioritizing USF funding for new development in Tribal lands.²²

Activity 15: Resolve Barriers to Access Rural Utilities Service Programs

Regulatory

The USDA should identify barriers to access Rural Utilities Service (RUS) funds for tribes and work to resolve those barriers.²³ This work should include:

- Modernizing accountability measures to better track the impact and value of investments,²⁴ and
- An analysis of the timeline for financial stability requirement to account for the financial realities of broadband deployments in Tribal areas.²⁵

In October 2020, USDA introduced an alternative option for matching fund and loan substitution fund deposit requirements for the ReConnect Program.²⁶ The ReConnect Program is being formalized through rulemaking (see RIN 0572-AC51).

Activity 16: Eliminate Single-Use Funding Restrictions

Legislative

The ABI should work with the FCC to explore the impacts of single-use funding restrictions on Tribal broadband deployments and identify recommendations to mitigate or eliminate any negative impacts. This would include working with Congress to amend Section 254 of the Communications Act to allow tribes to better leverage federally subsidized telecommunications infrastructure for broader community deployment of broadband services and to benefit from “dig once” deployment strategies.²⁷

Activity 17: Increase Funding Available for Planning

Legislative

IEED, through the BDP, proposes to increase funding for planning activities through the National Tribal Broadband Grant. This grant program would continue to focus on early-stage planning activities, such as feasibility studies, necessary for Tribes to be prepared for development with the RUS and USF programs, or through other partnerships.²⁸ National Tribal Broadband Grants are made for up to \$50,000.

²¹ *Ibid.*, 37.

²² USTelecom. *Issue Brief: Broadband Infrastructure*. (31 January 2019). Retrieved from <https://www.ustelecom.org/issue-brief-broadband-infrastructure/>.

²³ GAO, *Tribal Broadband*, 23.

²⁴ NTIA, *American Broadband Initiative*, 30.

²⁵ GAO, *Tribal Broadband*, 21-22.

²⁶ GAO, *Tribal Broadband*, 21-22.

²⁷ FCC, Native Nations Communications Task Force, *Improving and Increasing Broadband Deployment*, 6, 37.

²⁸ GAO, *Tribal Broadband*, 21-22.; GAO, *Telecommunications*, 14.

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Activity 18: Implement the Tribal Broadband Connectivity Program

Legislative

NTIA should implement the \$1 billion Tribal Broadband Connectivity Program, to provide grants supporting access to and adoption of broadband service on Tribal Lands²⁹. These grants may be used for broadband infrastructure deployment, affordable broadband programs, distance learning, telehealth, digital inclusion efforts, and broadband adoption activities.

Activity 19: Establish a Program for Match/Seed Funding

Legislative

IEED proposes to create and manage a new funding program, through the BDP, to provide initial investment, “seed funding,” for Tribal broadband infrastructure projects. These funds would be used to meet matching funds requirements for RUS or other federal programs, as well as to incentivize private investment in Tribal infrastructure projects.³⁰ IEED estimates projects would cost \$8 million to \$12 million to have sufficient impact.

Activity 20: Identify Critical Infrastructure Corridors for Incentivized Investment

Legislative

IEED recommends the establishment of zones for incentivized investment in critical infrastructure to unserved and underserved Tribal communities. The Critical Infrastructure Corridors would include broadband and other telecommunications, electricity, roads, energy, and water infrastructure.

Critical Infrastructure Corridors should be identified by overlaying Opportunity Zones, NEPA exemption areas, and existing infrastructure networks with underdeveloped and underserved Tribal communities.

PERMITTING: REDUCE COMPLEXITY AND DELAYS

Activity 21: Conduct Cross-Agency Analysis and Changes to Streamline Policies

Administrative

Building on the completed analysis from the American Broadband Initiative, the BDP would conduct a cross-agency analysis of permitting procedures for impacts on Tribal lands and recommend additional opportunities for efficiency.³¹

²⁹ *Coronavirus Response and Relief Supplemental Appropriations Act, 2021*, Public Law 260, 116th Cong., 2nd sess. (27 December 2020), Section 905(c).

³⁰ GAO, *Tribal Broadband*, 21-22.

³¹ NTIA, *American Broadband Initiative*, 16.

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Activity 22: Explore Opportunities to Align Permitting on Tribal Lands with Standard Procedures of Other Federal Agencies (SF-299)

Regulatory

The BDP would work with the BIA Office of Trust Services to assess how to better align Tribal rights-of-way processing with the rest of the federal government. In particular, this work would look at the potential use of SF-299 as part of the Tribal rights-of-way process.³²

Activity 23: Streamline the Environmental Review Process

Regulatory

The DOI proposes to seek a Categorical Exclusion for telecommunications infrastructure projects on Tribal trust and restricted lands (in progress).

Activity 24: Streamline the Historic Preservation Act Review Process

Regulatory

IEED proposes to work with the BIA Office of Trust Services, the American Council for Historic Preservation and the National Association of Tribal Historic Preservation Officers to identify and implement strategies for improved efficiency of Historic Preservation Act Reviews on Tribal trust and restricted lands. This work builds on the USDA Rural Development Memorandum of Agreement regarding Section 106.³³

ADOPTION: BRING BROADBAND INTO HOMES AND BUSINESSES³⁴

Activity 25: Expand Use of the National Verifier for the Lifeline Program among Tribal Programs

Administrative

The BDP proposes to work with the FCC and the Universal Services Administrative Company (USAC) to expand the use of the National Verifier for Lifeline program among Tribal programs. This would include working with BIA Office of Indian Services to complete a Computer Matching Agreement for the FASS-CMS (BIA General Assistance Program database) and supporting outreach to Tribes to link their own data systems to the National Verifier. The BDP would also work with USAC, Indian Affairs programs, and Tribal governments to expand awareness of the Lifeline and Link Up programs among potential beneficiaries.

³² *Ibid.*, 15.

³³ *Ibid.*, 17.

³⁴ Brake, Doug. *A Policymaker's Guide to Rural Broadband Infrastructure*. Information Technology & Innovation Foundation. Retrieved from http://www2.itif.org/2017-rural-broadband-infrastructure.pdf?_ga=2.34140323.385965194.1586962000-732484846.1586962000. (2017), 10.

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Activity 26: Identify and Expand Programs to Put Internet-Capable Devices in Homes

Administrative

The ABI should identify and recommend enhancements to programs, such as the U.S. Department of Housing and Urban Development ConnectHome program and library hot spot lending programs supported by the Institute of Museum and Library Services, to provide or subsidize internet-capable devices to individuals, especially students and families needing remote learning support.

Activity 27: Identify and Expand Digital Literacy and Inclusion Programs for Tribes

Administrative

The ABI should identify and recommend enhancements to programs, such as the IMLS-supported Digital Literacy Corps pilot, to foster digital literacy and inclusion among Tribal populations. These initiatives may be paired with other critical outreach programs, such as financial literacy, etc.^{35, 36} ABI should coordinate with IMLS to increase awareness of the role of Tribal libraries in digital inclusion and broadband adoption.

ECONOMIC DEVELOPMENT: LEVERAGE BROADBAND FOR GREATER IMPACT

Activity 28: Identify and Expand Programs Supporting Economic Activity through Broadband Access

Administrative

ABI should identify and recommend enhancements to economic development programs that require or would be significantly benefited by broadband access. ABI should investigate sectors such as: telemedicine, virtual and remote learning, public safety, rehabilitation programming, Smart Agriculture³⁷, access to government and community information, Smart Cities, entrepreneurship, and workforce development (including job search and skill building).

³⁵ *Ibid.*, 11.

³⁶ FCC, Native Nations Communications Task Force, *Improving and Increasing Broadband Deployment*, 31.

³⁷ U.S. Department of Agriculture. *A Case for Rural Broadband: Insights on Rural Broadband Infrastructure and Next Generation Precision Agriculture Technologies*. (Washington, D.C., 2019), 43.

KEY ACTORS AND STAKEHOLDERS

Federal Government

- Federal Communications Commission (FCC)
 - Office of Native Affairs and Policy (ONAP)*
 - Wireless Telecommunications Bureau (WTB)*
 - Wireline Competition Bureau (WCB)*
 - Office of Economics & Analytics (OEA)*
- Institute of Museum and Library Services (IMLS)
- Universal Service Administrative Company (USAC)
- U.S. Department of Agriculture (USDA)
 - Rural Development (RD)*
- U.S. Department of Commerce (USDOC)
 - Census Bureau*
 - Economic Development Administration (EDA)*
 - FirstNet Authority*
 - National Telecommunications and Information Association (NTIA)*
- U.S. Department of Education (ED)
 - White House Initiative on American Indian and Alaska Native Education*
 - Office of Indian Education (OIE)*
- U.S. Department of Housing and Urban Development
 - Office of Native American Programs*
- U.S. Department of the Interior (DOI)
 - Office of Indian Energy and Economic Development (IEED)*
 - Bureau of Indian Affairs (BIA)*
 - Bureau of Land Management (BLM)*
- U.S. General Services Administration
- U.S. Office of Management and Budget
- White House Council on Native American Affairs (WHCNAA)
- White House Office of Science and Technology Policy (OSTP)
 - Networking and Information Technology Research and Development Program (NITRD)*

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Tribal Consortia

Alaska Federation of Native (AFN)

Native American Finance Officers Association (NAFOA)

National Congress of American Indians (NCAI)

National Tribal Telecommunications Association (NTTA)

Native CDFI Network

Private Sector

Institute for Local Self-Reliance

The Rural Broadband Association (NTCA)

Wireless Infrastructure Association

US Telecom

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