

**Consultation on Seeking Recognition as a Tribe under the Alaska IRA**

**DEPT. OF THE INTERIOR**

**December 12, 2018**

**10:00 am AKDT**

Coordinator: Welcome and thank you for standing by. At this time participants will be in a listen only mode until the question and answer portion. At that time if you'd like to ask a question press Star 1. Today's conference is also being recorded. If you have any objections, please disconnect at this time.

And now I would like to turn the call over to your host today to Mr. Mark Cruz. Sir, you may begin.

Mark Cruz: Great. Thank you. Hello everybody. This is Mark Cruz and I currently serve as the Deputy Assistant Secretary for Policy and Economic Development here at the US Department of Interior. Before I begin, I just want to thank everybody who is on the call and convey the Assistant Secretary's kind of concerns and thoughts with the recent earthquake.

And so we appreciate everyone's flexibility you know over the last couple of weeks. And so as many of you know, we're kind of in this consultation process and this was originally supposed to be one of the last consultation meetings; however, we've had to reschedule a couple of those meetings that we had staff planned to be out in Alaska the week of the earthquake.

And so if you want to grab your pen and paper, I will give you the new consultation dates. So the new dates will be January 16, in (Bethel), Alaska and the time is going to be determined on that and then up in (unintelligible) the following day on January 17 our team will be out there for the rescheduled

consultation and we are actually working on a letter and will get that out to travel leaders in Alaska during the next couple of few days.

So I'll repeat those towards the end. But our thoughts are with you all. We have tons of staff out there and so we're with you in solidarity. But the purpose of today's consultation is it's the ongoing consultation sessions that are designed for us to get your feedback on the issue of the Alaska portion of this Indian Reorganization Act and how it applies in the tribal context.

And so as you guys know you know since this is a phone call, I need to kind of go over some of the parameters here. This is a formal consultation so everything that is said during this conversation is being recorded and a transcript will be made available after this meeting. There's also an opportunity to submit written comments to our staff here.

I've already mentioned my title, but here on my side, I've couple of staff here that are also listening in. One is our counselor, Tyler Fish, Counselor to the Assistant Secretary of Indian Affairs. Another staffer is Elizabeth Apple, she's been involved in a number of consultations and then we have Miles Janssen from the solicitor's office.

And so as you guys kind of think about today's consultation, I just want to remind you where we are as a department. In recent years, the Department has received a number of requests from groups in the State of Alaska seeking to organize under the Alaska IRA. For those Alaska groups seeking recognition under the Alaska IRA, the process has been viewed as protracted and indeterminate. The Department, we appreciate those concerns and because of Alaska's unique history - has a unique history complicated by congressional statutes and federal court decisions, which has resulted in the

Department facing difficult and complex legal and policy questions related to organization under the Alaska IRA.

So in today's consultation I would like to get your feedback that we'll kind of include in our ongoing records in an effort to provide more clarity and transparency to those groups seeking to organize under the Alaska IRA. So that the Department might be better able to implement the statues acknowledgement provision as it relates to groups petitioning from Alaska.

So that's the background and what I would like to do know is open it up to anybody who has any questions, comments, concerns, of those on our side of the line. So (Melissa).

Coordinator: Yes sir. Thank you. At this time, if you would like to ask a question, please press Star 1 and record your name. Again to ask a question, please press Star 1. One moment for questions. Once again if you would like to ask a question, please press Star 1.

We do have our first question. Our first question is from Craig Jacobson, your line is open.

Craig Jacobson: Oh hi. My name is Craig Jacobson I'm an attorney with the law firm Hobbs, Straus, Dean - we've got a Portland, Oregon office - trust and travel organizations in the State of Alaska and the question that I have is related to the letter that went out in association with these consultations posing a number of questions and it appeared from reviewing those questions that a number of those questions that were asking for responses didn't necessarily relate to the Federal Acknowledgement or tribal recognition process that were broader questions about the applicability or continued applicability of the Indian

Reorganization Act which is a much bigger question than how tribes are recognized in Alaska.

And I think our understanding is there are currently three pending applications for recognition, so the fact that you've got a pretty massive multi-city consultation rulemaking addressing three pending applications, is also been a question or concern.

These are my two questions. Are there bigger issues that you're seeking input on regarding the applicability of the IRA other than this recognition process and then the second question you know related to that how did the Department determine it was necessary to do a multi-city, multi-stage consultation in the State of Alaska, if essentially you only have three pending applications?

Thank you.

Mark Cruz: Hey Craig, thank you for your questions. This is Mark and so I'll go ahead and take a stab at these. To your first question no one broader IRA applicability. This is very much a forward looking endeavor rather than going back and re-evaluating what's been done before under the Alaska provisions of the IRA. So no broader implications.

On your second question, that comes from The White House asked us as a new incoming administration to reevaluate a number of decisions that were made late in the previous administration. So this is part of that broader review process. And I didn't know if you had any follow-up or feedback.

Craig Jacobson: Yes. I'm not sure if my access line is still open, but if so, yes, I guess your first answer...

Mark Cruz: Yes, I can hear you.

Craig Jacobson: ...perhaps is the most important one which is that there are a number of tribes that came to the State of Alaska that when they saw the question regarding whether or not the IRA had continued essentially applicability in the State of Alaska, that raised alarm bells for a number of tribes that were recognized or have constitutions under the IRA - a number of tribes refer to as IRA Councils.

A number of tribes as you know coming out of the Akiachak litigation they have pending applications to place land into trusts that authority under which is Section 5 of the Indian Reorganization Act. A number of tribes that have Section 17 corporations under Section 17 of the Indian Reorganization Act.

And so that list goes on and on about the authorities under the Indian Reorganization Act and obviously the principal that was relayed under the Akiachak case was that Interior's not supposed to have two classes of tribes. Those with certain rights under the Indian Reorganization Act and those with lesser rights.

So that question with well should, could or how does the IRA continue to apply to the State of Alaska raises concerns that the Department might take the position that the IRA somehow is no longer applicable to the State of Alaska or is applicable in a way that would create lesser rights per tribe in the State of Alaska which I think, tribes in the State of Alaska have taken a position that the Akiachak sort of resolved that question. Thanks.

Mark Cruz: Yes, I definitely get those concerns and how that can kind of be construed on that side. You know it wasn't the goal or the intent to kind of re-litigate existing authority, but from kind of a policy perspective, you know this is really looking at the existing petitions and you know creating a system and we

don't know what that system quite looks like hence the consultation for evaluating petitioners coming out of Alaska.

So definitely I understand where you're coming from and that's good to have put on the record, but you know it shouldn't be read into any further than what we do moving forward with petitions that the Department receives and you know should we create a structure and if so, what is that structure look like that is amenable to the petitioner's, as well as existing tribes in Alaska.

Tyler Fish: Hey Craig, this is Tyler Fish and if I could just kind of make a little bit off of Mark's commentary. I don't think the intent in putting those questions in the letter was to call into question the applicability of the Alaska IRA, but more so to have a full some conversation with the tribes that are there about is this a good policy foundation for recognition based upon the tribes' perspective there to move forward.

Do they feel like the Alaska IRA is sufficient or are there other elements that they may want to suggest that the Department should consider in recognizing a new tribe.

Coordinator: And once again if you would like to ask a question, please press Star 1. Our next question we have comes from Benjamin Arnold. Your line is open.

Benjamin Arnold: Good morning. I'm from the Native village of Noatak and I strongly encourage whoever is there to I guess follow-up on the Native village of Noatak status. Being recognized by the Federal Government Department of Interior, and I just want to know where do we stand in reference to this issue? Does anybody know within this session?

Mark Cruz: Hi Sir. Can you spell that out for me? Sorry I'm looking it up right now, your village.

Benjamin Arnold: Noatak. N-O-A-T-A-K. We are only one form of government which is IRA. We don't have city government. We do not get any revenues from the State of Alaska. The only funding that we do receive is from Federal funding a coop program, higher education, EPA, (IGAP) - we have those programs and the tribal transportation program.

So I guess with that being said and the funding that we've received, you know I do believe that we are recognized up until today, because we do receive funds. So I just wanted to make sure that we are being recognized under the IRA and I think our Native village of Noatak, the programs that we are running today, you know year after year - of course we have had a couple of turnovers in some of the programs, but we've brought it back up again.

But I think the programs that we do have are federally funded, so you know I just wanted to know what our status is in reference to the recognition issue.

Mark Cruz: Yes sir. Thank you for your question in spelling that out for me. But yes, today's effort there are no implications on your federal recognition status. Once again this is only for the questions that we're posing are only forward looking versus retroactive. So you're recognition in question or in doubt.

Benjamin Arnold: Okay. So we shouldn't have anything - you know I'm just going to say my opinion, I'm just going to say that we shouldn't as a Native village we shouldn't be worried being cut off of anything else, it sounded like President Trump is threatening to close the government down, just in the last few days of issues that are coming up in his administration. So you know I'm just kind

of worried about that - if he was to close the government down, then I mean where we stand in reference to the bigger picture I should ask?

Mark Cruz: Just kind of to get at your question and concerns. Your status is unquestioned. Programs will continued to be funded so long as Congress appropriates money and kind of on a broader question, you know I appreciate you being on the line and offering your input, because it is important to hear from other Alaska tribal leaders and village leaders on this question.

Because what tends to happen as we consider new petitioners, the views of those around them, the views support or opposition - all of that is taken into consideration as the recognition process is underway.

That's why it's important and that's why the Department felt compelled to do tribal consultation in Alaska on these questions was not necessarily to make any determinant - take any determinant actions, but rather get the input from folks on the ground and folks like yourself. So appreciate you being on the line.

Benjamin Arnold: Thank you very much. Like I said I work with the (IGAP) assistant for the EPA program and yesterday the council had a meeting and I submitted all of this information or the initial information for this call to action consultation and I did submit the information to the council and told them that their guys consultation was supposed to start at ten o'clock this morning and I don't have any council members here.

I don't know due to the fact maybe a few other issues in their life, like I said the only one here and I'm only with the administration, so you know so the questions for Indian Reorganization Act review some of the questions that



they have in there, I'm just trying to understand how should the Department of the Interior define or interpret the statutory for each common bond?

You know, this is my first time under consultation and ever. You know I've never been involved with the consultation in regards to our community so I'm just - I think when that passed in 1936, I think we're doing pretty good as of today in reference to getting programs in our community and such and I think our IRAs are still relevant in today's Alaska.

Mark Cruz: Mm-hm.

Benjamin Arnold: And I think it will continue to be relevant because if we don't have any other form of government that we're going to create unless something happens then you know for us to make another government, then our IRA seems to be in a good position to be able to get funding when available and going through a process, but can I make a comment on the common bond issue? So that I can understand it better?

Mark Cruz: Yes. Just a couple of points. I'll have one of the guys speak to you where that question from common bond comes from. No your perspective is absolutely appreciated. I understand from your comments that you're the only one there. Just know that you and the tribe and village have until January 25, 2019 to submit any written comments that you may have on the issue. So do one of you want to take the common bond where the impetus for the question.

Miles Janssen: Sure. So this is Miles Janssen, I'm with the Office of the Solicitor. The question regarding common bond comes from the language of the Alaska IRA. When Congress drafted that law, they mentioned groups of Indians in Alaska not recognized as a band of tribes but having common bonds of

occupation or association or residence within a well-defined neighborhood or community or rural district could organize.

In the Alaska IRA, they don't explain what common bonds means and so that's why the Department is having this consultation to see what people in Alaska think common bonds would be. So we can record. Excuse me.

Benjamin Arnold: Is that in a general sense or is it individual village common bonds or is that the whole State of Alaska with the diverse people that we have. We have oh geez whiz, the (Gwich'in) tribe, the Yupik tribes and then other Northern Indian tribes in Southeast and the Yupik tribes in the middle part of Alaska and then the Inupiak nation in the upper north.

And I'm trying to understand the common bond issue with so many diverse people or nations in this State of Alaska, I don't know whether there is you know if I'm understanding it right it's a general question common bond, not individualized community common bond.

You know I'm trying to figure that issue out whether it's directed towards all Natives as one in the State of Alaska or are they going to divide up the nations say the (Atnah, Eyak), Yupik and lower Southeast area tribes because I don't know whether there is a common bond. I mean there could be, but I'm not too sure about that because I'm trying to understand the issue there.

Mark Cruz: And that's where your input is important because you know we have the previous definition and statute which is pretty vague and so the Department is - the question posed is whether we should update that definition and if we were to update it, what would Alaska leaders today - how would they define it or whether ideas for us to consider to define common bond?

Benjamin Arnold: And did you - and my next question did you receive any responses to those questions from the letters that were sent out in July 2000? Because I don't know if the Native village of Noatak every responded to those letters because I'm not on the council.

Mark Cruz: Yes.

Benjamin Arnold: I'm in the administration so I'm kind of you know, I wish I had council members here to you know ask those questions to you folks since I'm not on the council, I feel like I'm invading their powers that be as a (IGAP) assistant for the EPA program. I think I'm invading their powers and questions while they're not here. You know I feel like I'm doing something wrong without council members at this meeting.

Mark Cruz: We received a number of comments from tribes and villages and off the top of my head, I don't believe we received anything from you all, but just as a reminder you all have until January 25 to submit a comment or letter so you may want to check in with your council at another appropriate time.

Benjamin Arnold: Now would Native American Rights Fund be about to assist us if we needed assistance to make comments to all these issues and my hope is that NARF will be able to come up to Native Village of Noatak since we are on the IRA government to help us to understand these issues before January 25, 2019 for written comments.

And if we can get somebody from that office to come up to Native village of Noatak and explain to the IRA council what type of comments should we or you know as consultation process, what type of comments do we need to make if any because basically we don't have lawyers. We don't have somebody in our community that's going to understand these whole issues of

that might affect our community as a Native village. And my hope is somebody from the NARF office can come up to Noatak and explain these issues to the IRA council so that we can understand to make comments where need be.

Mark Cruz: Yes, that's an issue that you'll need to work out with your council and NARF. So I can't comment any further on that matter. So we definitely appreciate your comments today and the questions that you brought up and we thank you for your time.

Coordinator: And again for questions and comments, please press Star 1. Our next question is from Tracy Cooper. Your line is open.

Tracy Cooper: Thank you. I'm the general manager for the Native Village of Unalakleet and for the gentleman in Noatak, maybe it would be a good idea to give us a few minute overview of the land that went into trust and we're having this consultation?

Mark Cruz: Sorry. Was that question directed to me?

Tracy Cooper: To whomever could provide that overview so there's a better understanding of why we're having this consultations on the lands to trust.

Mark Cruz: Yes, the broad overview is that - oh excuse me. Yes, you may be describing the consultation on the Fee-to-Trust application that we're having latter today. You're looking for the Fee-to-Trust consultation that will be later today.

Tracy Cooper: Okay. I see that on the agenda. But maybe an explanation of this consultation between 10 and 12?

Mark Cruz: Yes, this consultation is actually on the Indian Reorganization Act and the Alaska IRA Amendment. As I described earlier, there are a number of petitions that the Department has received and so what we are doing is taking a review of how we process those petitions and our desire is to have a better understanding of how we take those petitions under consideration given new facts on the ground and what the landscape looks like today versus 1936.

And so that's kind of where we're going. We want to be able to provide more clarity and transparency to the petitioners who would like to organize under the Alaska IRA and make sure that we are taking views and considerations from everybody on the ground under consideration.

Coordinator: Once again for comments or questions, please press Star 1. Our next question is from Lloyd Miller. Your line is open.

Mark Cruz: Hi Lloyd.

Coordinator: Check your mute button. Your line is open.

Mark Cruz: Hi Lloyd. Can you hear us?

Lloyd Miller: Are you able to hear me?

Mark Cruz: Yes. I hear you now.

Lloyd Miller: Okay. I apologize for coming on to the call late and if you've already responded to this question, no need to take everybody's time. Really two questions. First, from prior consultation sessions, I understood that this particular consultation about organizing under the IRA was only applicable to

Alaska Native groups that are not currently on the list of federally recognized tribes. Can you reconfirm today that that is still the case?

Mark Cruz: That is correct sir.

Lloyd Miller: Okay. We heard and I guess maybe more research was going to be done, that there were only two non-recognized Alaskan Native entities that were seeking to reorganize under the Alaska IRA. Is that still the case or have you located additional petitions?

Mark Cruz: There - we've located additional petition.

Tyler Fish: One more.

Miles Janssen: Sorry. This is Miles Janssen. Two have been pending for quite some time. One was submitted just a few years ago and that's not been pending as long as the other two.

Lloyd Miller: Right. I understand the Qutekcak one was pending maybe 14 years and one out of near Dillingham was 17 years. Is there a third one?

Miles Janssen: There is a third one, yes that's currently pending.

Lloyd Miller: That's not a public record? You can't share who it is?

Miles Janssen; I don't think there's any reason to go into the application specifically on this consultation because this is (unintelligible) but I think we're here to discuss like the policy of recognition moving forward here without trying to draw focus on these groups' specific application.

(Lloyd Miller): Some of the comments may have already - this is my last comment then you can go to the next speaker. Some of the comments have pointed out the 1936 instructions from Mr. Ickes at the Department for implementing the Alaska IRA in the particular, the common bond provisions. Has the Department concluded that that guidance is deficient in some way?

Mark Cruz: Not necessarily deficient but again given the change in landscape and number ensuing federal statutes and regulations, it's just taking this opportunity to review what's out there and the landscape is significantly different now than in 1936.

And so - the question is should we continue to use that definition or do Alaska leaders want to - want the Interior to consider developing a different definition. And so we haven't made a determination whether it even is deficient or not, it's just a conversation starter.

Lloyd Miller: Okay. Thank you. I'll let you go to the speaker. I know time is short.

Mark Cruz: Thank you Lloyd.

Coordinator: Thank you. The next question is from Curtis Sommers your line is open.

Curtis Sommers: Okay. I'm sorry I called in late and I see this portion is the IRA Amendments.

Mark Cruz: Yes sir.

Curtis Sommers: Okay. It's my thought that you know I'm really for land into trust. Is the Department of Interior attempting to take those rights away from the tribes here in Alaska?

Mark Cruz: No, but that will be a part of our conversation in our second consultation today sir.

Curtis Sommers: Okay. That's it for my question.

Mark Cruz: Yes. Look forward to hearing from you later.

Coordinator: And once again for questions or comments, please press Star 1. Now we have Benjamin Arnold. Your line is open.

Benjamin Arnold: Yes. Just if you haven't have a snow machine that's working and there's nothing wrong with it, you don't have to fix the snow machine. It's going to be operating still and there's nothing wrong it - you know you don't have to fix the snow machine. It's going to be operating still. I don't have to do anything, I just have to turn the key on and get it started and move.

And the same principal you know, we find out that Native village of Noatak, you know we have been here, established, recognized by the Federal Government and I don't see any problems or any issues that is coming to our community. So if there's a deficiency within the system, by all means you know remedy the issues, but if it's still going to work you know I'm not going to mess around with that snow machine if it's going to work.

I'm not going to mess around with that carburetor or put some more gas or anything like that, you know I'm just going to continue to go. And I think in the same principle, if there's no deficiencies within the system then why try and fix something that's not broken.

Because I believe the system is working for us. I don't know about any other communities, but you know that's my two cents in that issue. Thank you.



Mark Cruz: Yes. Thank you for your perspective sir and yes I tend to agree with that analogy, but again there are a number of petitioners that find the process that would like to these are folks that would like to enjoy the same recognition as other Alaskan Natives. And so this process that spans decades, some continue to say that the process is protracted indeterminate and so part of our review you know - a number of different regulations and statutes are reviewed.

So we are just taking a wholesome view of this and receiving input from Alaskan Natives and leaders and I definitely appreciate that comment and we'll include that in the record.

Coordinator: And for comments or questions, again please press Star 1. Our next question comes from Moses Owen. Your line is open.

Moses Owen: Thank you. Good morning. I think we made some comments up in (Akiachak) for in the initial consultation and our comments were not to change whatever is working right now. But my other point is that if we're going to have a meaningful consultation, we have some communities that are not aware of what's happening and they may want to put their word into how they want to see these - the present constitutional bylaws and how they were written.

It's working for our (Akiachak) Native community and we wish not to change anything. I hope our community members here feel the same way. But we would like whenever consultations are happening each community in each village visited because some of the communities don't enjoy the facilities like we do or the phones and stuff like that some of the communities enjoy. So and I'd like to know how many communities out of the 229 tribes here have gotten in contact with you on this issue?

Mark Cruz: You know we definitely have your initial comments registered and this is an ongoing process where we create a record. Of the 229, I don't have that figure off the top of my head, but we do, do our best to get word out about these consultations and so this process started back in August.

And so we get the information out through our website, through social media, phone calls, letters and emails. And so if you know of anyone that doesn't know about these consultations please don't hesitate to reach out to me and let us know so we can get them that information and ensure that they have an opportunity to provide input before the January 25, 2019 comment deadline.

And just so you know we will have a few more consultations where we send staff up to Alaska January 16 and January 17. So we're you know we're definitely mindful and want to get word out, so appreciate you pointing that out to us.

Moses Owen: Okay. We'll do the best way we can here to make sure some of these communities have their input into this and thank you for making the time to do this.

Mark Cruz: Yes. Absolutely. Thank you sir.

Coordinator: Please press Star 1 for questions or comments. And we have Benjamin Arnold your line is open.

Benjamin Arnold: ...implement the Alaska IRA Organizing Provision through regulation, through former agencies guidance, through some other means. To me, regulations are kind of set in stone kind of issue where they can be amended if need be, but I think formal agency guidance should be let loose to where there

is some room enough to make amendments through either via letter, telephone calls or any other form of communication.

Whereas, regulations once they are set, then you know we'd have to go through the process of amending and taking the time to change regulations can be kind of a lengthy process.

Mark Cruz: Mm-hm.

Benjamin Arnold: However, with guidance I think if we have you know the proper people to guide us you know through implementing of the IRAs, the Alaska IRA organizations, you know provisions, you know I think that is more towards what I'm leaning to is agency guidance. You know since I guess just having the regulations would be you know set in stone. Whereas, guidance is it's ongoing you know assistance.

Mark Cruz: Yes. Are you getting to kind of question 6 on the survey sir, where it's your preference to see guidance versus regulation or some other means?

Benjamin Arnold: Yes. Yes.

Mark Cruz: Absolutely and this is part of our consultation effort is to determine what folks on the ground at the local level would like to see from the Department and so we have not made our minds up how we're going to proceed from here other than the fact that we wanted to start this conversation, get word and get input from leaders in Alaska.

And so we'll definitely take your comments and include them on the record but I can see where you're coming from in your evaluation.

Benjamin Arnold: Thank you.

Coordinator: The next person is Curtis Sommers. Your line is open.

Curtis Sommers: Yes. Good morning. I was wondering how many tribes are on this teleconference and if this is considered a consultation. I've been to a consultation in the lower 48 where only 20 or 25 tribal leaders and delegates were at a USDA meeting and we were informed that it was a consultation.

And I asked how can the so few tribes represent over 500 tribes in the class of US of A and they say it is still considered a consultation. So I was wondering how many tribes on this teleconference and if it is considered a consultation?

Mark Cruz: Thank you for your question sir. Yes, this is a formal consultation. At one point, we had a couple dozen folks on the line listening in and everything that has been said on this phone consultation is being combined into a record that includes comments, questions and all remarks from the previous consultations we've held in Alaska.

And the record will continue to grow, in our future dates in January where we'll have a couple more consultations on this question. And so, yes to your underlying question, you know consultation is set forth by Executive Order and so we do our best to get notification out to as many tribal leaders as possible.

And so we can't hit them all at once and so that's why we make ourselves available in a number of different forums including in person, as well as on the phone and also other larger tribal gatherings like NCAI or AFN or the Alaska providers conference. So we do our best but it is an imperfect art. So we definitely appreciate your comments.

Curtis Sommers: Another one is you know I'm a tribal leader in Tanana, a chief of my tribe. You know I would expect at least the chief of that department to be consulting with the tribal leaders here instead of sending his staff and stuff to talk to the leaders telling us about the changes.

I would like to hear it from the top about the changes and what are the reasons behind the changes if things are going well because with my knowledge of what goes on between the United States Government and the Native American tribes is that the United States Government will screw the tribes any over any chance it gets.

Mark Cruz: Well sir, I am delegated the authority to conduct this consultation through the Assistant Secretary of Indian Affairs, as well as the Secretary of the Interior. Anything you know I will report back up to them and so you know I get your concern.

Curtis Sommers: Well please, a sign of disrespect. I see like the National Congress of American Indians convention very, very few times the Secretary of Interior bothered to show up and the President of the United States definitely does not show up.

Mark Cruz: Okay, I will take your concerns to the appropriate personnel. Thank you for being on the call.

Coordinator: For questions or comments, please press Star 1. For final comments at this time, please press Star 1. We have Benjamin Arnold, your line is opened.

Benjamin Arnold: The seven to nine issues on the second page - can I get (unintelligible) is there a town specific to Alaska Native groups that make their - can I get just a brief understanding of that issue 25 CFR or 38?

Mark Cruz: So just - real quickly I'll give you an answer from the policy level and if the attorneys have anything you want to add in. So the Part 83 process is the administrative process of how the Department of the Interior recognizes petitioners for Federal Acknowledgement in the lower 48.

So these questions are really getting at do leaders and villages in Alaska think that the process that lower 48 tribes are encumbered to adequate or sufficient for recognition in the Alaska context and then for your own edification, acknowledgement happens in one of two different ways.

One is this Part 83, process and the second is by an act of Congress. So this is really getting at half the questions and if Alaskan Native leaders believe or have any commentary on do you think the lower 48, process is sufficient for Alaska?

Coordinator: And so with that I'm showing nothing further.

Mark Cruz: Great. Well, I just want to take this time to thank everybody who jumped on the call. We had quite a great turnout here. I appreciate everyone's comments and you joining us this morning.

For those of us that are for - for those of us that are looking for the consultation on the deed of trust that will be held at 1:00 your time, so just under two hours. And so we'll dial back in and we will have a consultation on the deed of trust process then, but I want to thank everybody for their time.

And for those of you joining us later, look forward to the questions. Thanks so much and have a nice day.

Coordinator: Thank you. This does conclude today's first session. Parties may disconnect at this time. Thank you.

Welcome and thank you for standing by. At this time all participants are in a listen-only mode. After the presentation, we will conduct a question and answer session. To ask a question, please press star then 1, and record your name.

END