



December 3rd, 2014

Re: Docket No. 140-925800-4800-01
Comments from BSNC on the NTIA FR Notice

Via email to: arcticnoi@ntia.doc.gov.

Comments from the Bering Straits Native Corporation on the NTIA's Notice of a Telecommunications Assessment of the Arctic Region

The Bering Straits Native Corporation (BSNC), a corporation formed under the Alaska Native Claims Settlement Act (ANSCA), is strategically located on the Bering Strait near the 50-mile-wide expanse between Russia and Alaska. BSNC will be significantly affected by the developments that are forecast to take place in the Arctic. In fact, we are already preparing for this eventuality, as described below.

Therefore, it is vital that the indigenous population of BSNC and its location south of the Arctic Circle but in the Bering Sea be taken into account as the NTIA prepares this telecommunications assessment of the Arctic Region and makes its recommendations to the President.

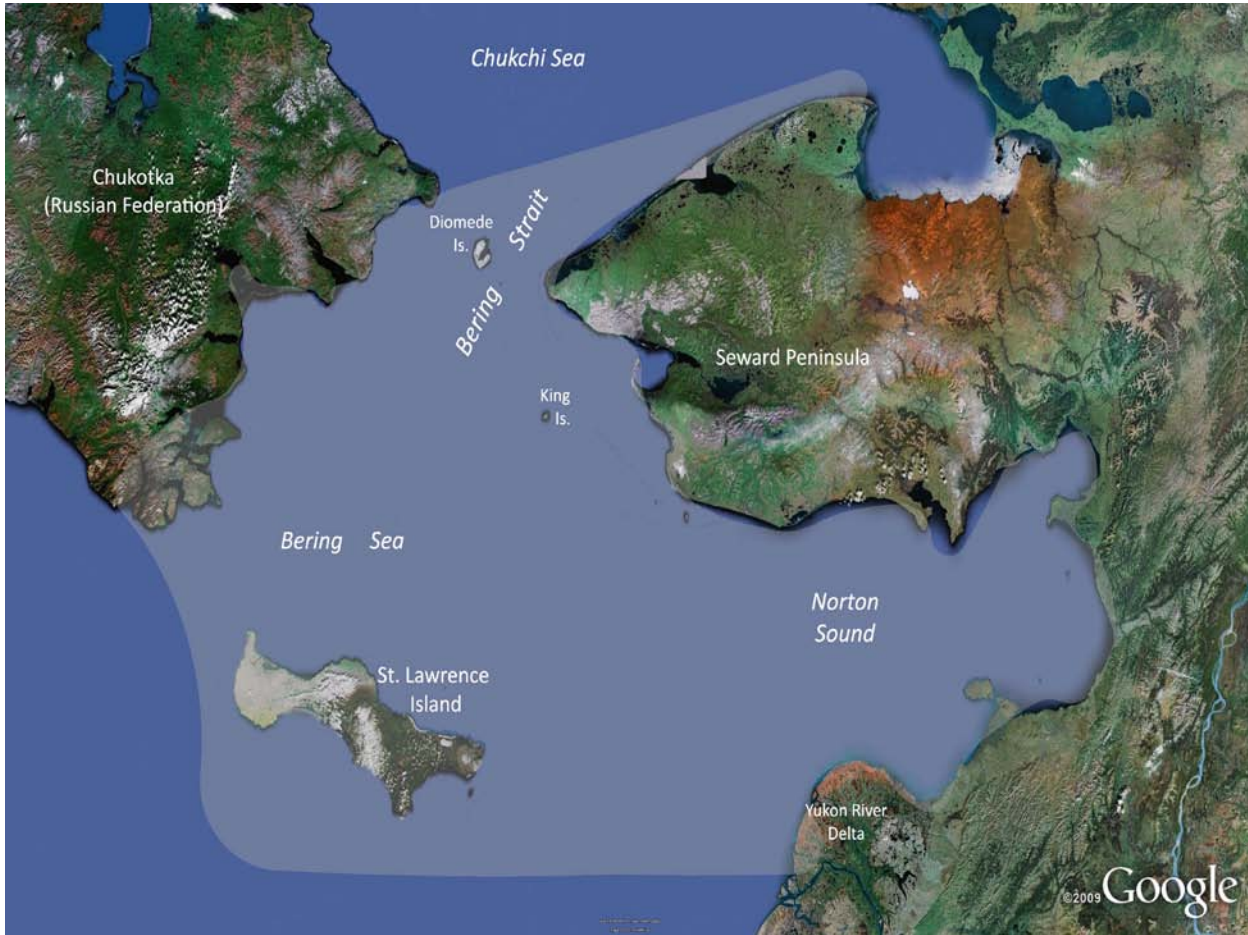
General Comment on the Scope of the Notice

The National Telecommunications and Information Administration (NTIA) has invited comments from those who may be located outside the "Arctic Region of Alaska" as you have defined it.

You have defined this region as a very narrow area, the "geographic region north of the Arctic Circle." This definition makes it very difficult, if not impossible, to have a comprehensive communications system that will be needed by those who will transit to and from areas beyond the Arctic Circle. Areas such as that inhabited by the BSNC will need to be included if telecommunications and search and rescue coverage is going to be complete. Below is a map of the general Bering Strait area, which lists the major geographic features. It is important when viewing this map that the following information is kept in mind:

In this region, on the U.S. side, there are:

**16 communities occupied year-round, with
2 other occupied seasonally, with
20 Tribal Organizations (Traditional Council or IRA), and
20 Village Corporations**



BSNC is in the process of developing a deep water port that will be a staging base not only for U.S. Coast Guard activities but also for the private sector that has already expressed an interest in Arctic oil and gas and transshipment projects. BSNC selected this parcel of land under the 1971 Alaska Native Claims Settlement Act. The land will be conveyed to the BSNC by federal legislation, now pending before Congress, the “Point Spencer Coast Guard and Public-Private Sector Infrastructure Development Facilitation and Land Conveyance Act” (H.R. 4668). Or through legislation in the next Congress. Once the land is conveyed to BSNC, we will be working with the State of Alaska and other stakeholders to develop important infrastructure at Port Spencer.

This port will be vital to shipping and other interests that will transpire in the Arctic Region. And, communications --now very limited on the island --will have to be expanded in order to satisfy the needs of the Coast Guard, the State of Alaska, and private developers and to ensure the safety of all those who transit the Bering Sea on the way north.



For this reason, the BSNC strongly encourages the NTIA to recognize the unique geography and situation of Native Alaskan corporations such as ours and expand your definition of the Arctic to include our lands. The widely-accepted definition of the Arctic in the Arctic Policy and Research Act (15 U.S.C. 1411) is much better suited to these purposes and we recommend its inclusion as the basis of your telecommunications assessment. This definition reads as follows:

“The term ‘Arctic’ means all United States and foreign territory north of the Arctic Circle and all United States territory north and west of the boundary formed by the Porcupine, Yukon, and Kuskokwim Rivers (in Alaska); all contiguous seas, including the Arctic Ocean and the Beaufort, Bering, and Chukchi Seas; and the Aleutian chain.”

Specific Comments on Telecommunication Services in the Arctic

With this comment on the scope of the Assessment, we offer the additional comments on the notice.

As noted above, communications to remote communities such as ours are extremely limited. An expansion of broadband services and satellite communications is essential if we are to develop our population in an economically sustainable manner and provide needed services to those who will be coming to our new port. We are currently lacking these key communications services.

BSNC further requests that any expansion of services and telecommunication hardware carefully consider the need for system redundancies to ensure that service is not reliant on a single cable or carrier. This can be achieved by combinations of overland, tower-to-tower, satellite, and subsea cable transmission routes. Since BSNC and the villages are the primary landowners in the region this would provide an excellent opportunity for service providers to partner with local tribal, village, and regional Native organizations.

The basic lack of service and glaring need for improvements in Arctic communities is well-reviewed and reported in the recent “Blueprint for Alaska’s Broadband Future”, a report from the Statewide Broadband Task Force, August 2013, which we commend for your consideration. This report acknowledged the significant gaps in broadband coverage in the State and made specific recommendations to remedy the situation. As the Task Force acknowledged:

“Alaska is part of this race [to the top in the globalization of trade and development]. The same factors that make broadband deployment difficult in Alaska – geographic remoteness, lack of roads, high costs –also mean that Alaska, more so than other states, has the most to gain from making sure that affordable and reliable high-speed broadband is available to all its residents.” (Task Force Report at 40.)



In considering the Arctic Region, those of us who depend on the vitality of the Arctic, the Bering Sea and the rest of Alaska and the lower 48 for our livelihood cannot be omitted from this race to the top. We are ready to assist NTIA to complete this Assessment in any way we can.

Thank you for your attention to these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Ganley".

Matt Ganley
VP Media and External Affairs.
Bering Straits Native Corporation