

**From:** [Valerie Fast Horse](#)  
**To:** [BOCrfc2015](#)  
**Cc:** [Karen Hanson](#)  
**Subject:** RFC Broadband Comments  
**Date:** Tuesday, June 16, 2015 2:46:12 PM  
**Attachments:** [NTIA RUS RFC Broadband Comments 1540414365-5365-01.doc](#)

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Good Morning,

Attached please find the Coeur d'Alene Tribe's comments to the Broadband Opportunity Council Notice and Request for Comment, Docket No. 1540414365-5365-0. We realize the comments won't be posted to the website, however, we would like our comments to be considered by the Broadband Opportunity Council.

Please feel free to contact me if you have any questions.

Thank you,

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"IT's what I do."

## ***Broadband Opportunity Council Notice and Request for Comment***

***Docket No. 1540414365-5365-01***

Robert Matt  
Administrative Director  
Coeur d'Alene Tribe  
P.O. Box 408  
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### **Objectives of This Notice**

The RFC requests public input on: (i) Ways the federal government can promote best practices, modernize outdated regulations, promote coordination, and offer more services online; (ii) identification of regulatory barriers to broadband deployment, competition, and adoption; (iii) ways to promote public and private investment in broadband; (iv) ways to promote broadband adoption; (v) issues related to state, local, and tribal governments; (vi) issues related to vulnerable communities and communities with limited or no broadband; (vii) issues specific to rural areas; and (viii) ways to measure broadband availability, adoption, and speed.

(ii) identification of regulatory barriers to broadband deployment, competition, and adoption;

In our experience, the Davis Bacon Act has artificially inflated the costs of our USDA BIP Fiber to the Home project. We recommend excluding infrastructure projects from the Davis-Bacon requirements due to the high cost of project implementation. Also we recommend allowing tribes the ability to determine fair wage compensation for infrastructure construction workers.

We found that the current budget and procurement requirements for USDA RUS funded projects are duplicative of our own internal processes and cause unnecessary delays to the point of missing entire construction windows. Empower Tribes (or at least states) to use our own internal processes for contract approval. Delegate authority to the Tribe (or local offices) to sign off and approve contracts and other documents required to keep projects moving.

We are also recommending longer lead times between Notices of Funding Availability and deadlines to submit applications.

(iv) ways to promote broadband adoption;

The Coeur d' Alene Tribe's Information Technology Department provides free broadband through our Community Technology Center open lab. It is equipped with 40 donated, used computers. We recommend funding toward equipping and operating, and staffing computer technology centers with the goals of providing technical assistance, training and outreach programs designed to benefit local communities.

(v) issues related to state, local, and tribal governments;

The Coeur d'Alene Tribe is Federally a recognized tribe. The Tribe has sovereign authority on a reservation located in rural North Idaho in both Benewah and Kootenai counties. The reservation covers 345,000 acres of mountains, lakes, timber and farmland spanning the western edge of the northern Rocky Mountains and Palouse country. The Tribe is governed by an elected body of tribal council members, who are committed to promoting the health, safety, welfare, education, and economic development on our reservations. The development of strong communication infrastructure on our reservation has an important role in the strength of public safety, security, and our economy.

The Reservation is primarily rural and relatively isolated. Except for the efforts of the Tribe in building out broadband infrastructure, the availability of advanced telecommunications systems beyond plain old telephone service was largely non-existent. Our region is economically depressed. Private carriers simply have no incentive to invest on our reservation. The tribe has been the only viable broadband provider to the majority of the reservation residents for over a decade. The key to completing any large-scale project is effective communication between parties- which includes funding agencies - to address inevitable challenges that arise throughout the life cycle of a project. We recommend that funding agencies use the government-to-government consultation to support these efforts.

(vi) issues related to vulnerable communities and communities with limited or no broadband;

For communities with limited or no broadband we recommend dedicating public resources to build fiber optic open access backbones which rural communities can connect to, such as the Northwest Open Access Network (NoaNet) throughout the United States. The presence of these backbones is similar to the public interstate highway system that links our great nation together.

(vii) issues specific to rural areas; and

See (v)

(viii) ways to measure broadband availability, adoption, and speed.

We recommend funding projects for local or regional data collection. The Coeur d'Alene Tribe has a Geographic Information System (GIS) Program that creates maps and statistics for various purposes. The GIS program uses sophisticated GIS technology to collect, store, and analyze information about geographic features, places and points on and off the Coeur d'Alene Reservation. The Tribe's GIS Program has been recognized internationally for their expertise in geospatial technology. Information stored on this server includes specific localized data, such as homes and buildings. A field inventory of all structures using GPS was completed in 2002. This survey was done in conjunction with emergency responders in the area. This GIS layer has then been continually updated since that time. Also, a highly accurate (2 meter resolution) line of site analysis has been created that uses Light Detecting and Ranging (LiDAR) data to predict wireless signal coverage. LiDAR analysis is particularly useful because it takes into account barriers such as trees and hills when determining line of site from a customer to a tower. Using these two GIS data layers the Tribal GIS Program has identified potential broadband customers for the Tribe's Wireless company (Red Spectrum Communications). Through our analysis we are able to determine areas that can be served through either our fiber or wireless networks.