



December 3, 2014

National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230
Attn: Arcticnoi@ntia.doc.gov

Re: Docket No.140-925800-4800-01

The Tanadgusix Alaska Native Corporation (hereafter TDX) appreciates the opportunity that the National Telecommunications and Information Administration (NTIA) has provided the public to comment on its Telecommunications Assessment of the Arctic Region (hereafter Assessment).

Background:

On May 10, 2013, President Obama issued the National Strategy for the Arctic Region in order to establish strategic priorities for the Arctic Region as a result of significant increases in Arctic activity due to the diminishment of sea ice. Subsequently, the White House issued the Implementation Plan for the National Strategy for the Arctic Region in January 2014. The Implementation Plan called on the NTIA to “assess the telecommunication infrastructure in the Arctic and use new technology to support improved communications in the region, including in areas of sparse population to facilitate emergency response.”

The NTIA notice requests feedback from all users residing “within the Alaskan portion of the Arctic and all users whose activities may require communications access across any portion of the Arctic” on available and planned communication services in the Arctic, including existing and potential networks, wireline-based broadband services, fixed wireless broadband services, mobile wireless, public safety services, emergency communications and search and rescue, satellite communications, submarine cable networks, aeronautical and maritime communications, high frequency radio communications, and existing and potential networks and services across the “Pan-Arctic Region”.

For purposes of this Notice, NTIA has defined the “Arctic Region of Alaska” as “the geographic region north of the Arctic Circle, which is at 66°33’39” North latitude. The area includes offshore areas such as the Chukchi Sea and the Beaufort Sea. At the same time, NTIA elicits comments from areas outside of this geographic area if their inclusion is relevant to the services, summarized above, on which information is requested.

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Comments from TDX:

The principal comment that TDX wants to provide to NTIA is that NTIA has taken too narrow a view of what is required for the provision of comprehensive communication services in the Arctic. The narrow definition of the Arctic region excludes areas in Alaska that will be critical to the expansion of needed government and private services required for Arctic exploration, development, search and rescue and safety. While a narrower definition of the Arctic Region may serve the purposes of the work of the Arctic Council, it does not serve the purposes of Alaskans and a comprehensive U.S. communications strategy.

TDX Corporation is located on St. Paul Island in the Bering Sea. TDX represents the largest Aleut community in the Arctic. St. Paul Island is in the middle of the Arctic marine routes, the last ice-free port to and from the Far Northern Alaskan Arctic. We are in the middle of the great northern seas of Alaska, 400-500 miles from the mainland of Alaska as one travels up to the Northern Alaskan Arctic. This great expanse of land and sea is a dark zone with no fiber or copper telecommunications links to the rest of the world. It can only be monitored and served by satellite communications.

The Alaska Arctic covers an expanse of land and sea so vast that conventional terrestrial broadband infrastructure cannot adequately and economically serve it. Only satellite communications can offer comprehensive and economic coverage, both point-to-multipoint and point-to-point. This coverage is required for commercial, consumer and public safety uses.

For almost forty years, telecommunications in rural Alaska and the Arctic Region have been served almost exclusively by satellite communications. Initially, geostationary satellites in the C-band frequency spectrum were employed. This has evolved to satellites in the Ku-band frequency.

With the coming oil and gas development of the Alaskan Arctic and new marine transportation routes through the great Northern Arctic passage, St. Paul and TDX will play an important role in the development of needed transportation, communications, and port infrastructure.

For this reason, our interests have to be included in any Assessment of communications in the Arctic. And, the definition of the Alaskan Arctic Region has to be broadened to take into account our location and our peoples. We strongly recommend that NTIA use the following definition of the Arctic that has been traditionally and extensively used in U.S. law, that of the Arctic Research and Policy Act:

“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.” (See 15 U.S.C. 4111)

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It is only by acknowledging the importance and relevance of these island communities that the Assessment can be made comprehensive and accurate for the provision of communication networks and services that will enable the U.S. to ensure safe transportation, sound resource development and management, and effective search and rescue services for the anticipated expanding users of the Alaskan Arctic Region.

In other respects, we encourage NTIA to review and take into consideration “A Blueprint for Alaska’s Broadband Future”, a report from the Alaska Statewide Broadband Task Force, issued in August 2013.

<http://www.alaska.edu/files/oit/bbtaskforce/2013-08-AK-Broadband-Task-Force-Report%7CA-Blueprint-for-Alaska's-Broadband-Future.pdf>.

This comprehensive report outlines the extensive gaps in broadband coverage in the State and makes specific recommendations on how to rectify these gaps. Specifically, the Task Force recommends that Alaska should adopt a minimum service objective of access to broadband service of 100Mbps (up and down) to households and businesses throughout Alaska by 2020, aligning with the FCC’s goal for connectivity as outlined in the National Broadband Plan. Another key recommendation that we endorse is to prioritize rapid development of broadband access that improves current service levels by reaching all locations as quickly as possible using satellite and terrestrial connections to deliver service at 10Mbps or greater per household or business unit. These recommendations should be incorporated in any final action NTIA takes on making recommendations to the President on needed communication improvements in the Arctic.

In summary, the coverage of the Alaskan Arctic has to be more comprehensive than the notice and current Implementation Plan has taken into account. Alaska’s unique situation and geography does not lend itself to piecemeal approaches to the Arctic Region especially when it comes to a comprehensive communications infrastructure.

On behalf of the Native Alaskans living on St. Paul Island, thank you for your consideration of these comments.

Sincerely,



Ron Philemonoff
CEO, TDX Corporation