

NATIONAL TRIBAL TELECOMMUNICATIONS ASSOCIATION

CONGRESS

September 2019

I. USDA – Rural Utilities Service Funding

- A. Because securing collateral is not feasible due to treaty/trust agreements, the Rural Utilities Service (RUS) is in most cases the only lending source for NTTA member companies.
- B. NTTA supports full funding for all RUS broadband and telecommunications loan and grant programs

II. FCC Universal Service Fund Cap

- A. FCC proposed placing an overall cap (~\$11.2 billion) on the universal service fund (High cost, Lifeline, E-Rate, Rural Healthcare)
- B. NTTA signed multi-party (64 signatories) letter opposing the cap
- C. NTTA comments submitted to FCC
 - Broadband availability gap in Tribal areas still needs work
 - Broadband availability data in Tribal areas is inaccurate
 - Affordability also needs to be addressed (Lifeline, E-rate, Rural Healthcare)
 - FCC should instead tackle USF contributions reform

III. Tribal Area Solution for Universal Service Support

- A. NTTA proposal for supplementing the FCC Legacy (non-ACAM) support mechanisms for any carrier serving Tribal areas.
- B. Basically adjusts parameters related to CAF BLS and HCLS calculations
- C. Would include certain buildout obligations

IV. Broadband Mapping

- A. GAO Report (18-630) on Tribal broadband data concluded FCC information overstates availability
- B. FCC “Digital Opportunity Data Collection (DODC)”
 - Eventually replace current census-block level Form 477 data with polygon file reporting
 - Further input sought on identifying serviceable locations
 - Crowd sourcing a key piece of the process, including input from Tribal governments
 - NTTA has concerns involving addresses, parcel data, and location identification in Tribal areas
- C. Recent legislation
 - HR 4128 – The Map Improvement Act of 2019
 - HR 4227 – The Mapping Accuracy Promotion Services Act
 - HR 4229 – The Broadband Deployment Accuracy and Technological Availability Act
- D. Funding concerns related to additional mapping, filing, and overall regulatory burden increase