

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Report on the Future of the Universal Service Fund)	WC Docket No. 21-476
)	

**Comments of
The National Tribal Telecommunications Association**

The National Tribal Telecommunications Association (NTTA) files these comments in response to the Notice of Inquiry issued in the above-captioned proceeding.¹

NTTA consists of Tribally-owned communications companies and broadband providers including Cheyenne River Sioux Telephone Authority, Fort Mojave Telecommunications, Inc., Gila River Telecommunications, Inc., Hopi Telecommunications, Inc., Mescalero Apache Telecom, Inc., Saddleback Communications, San Carlos Apache Telecommunications Utility, Inc., Siyeh Communications, Tohono O’odham Utility Authority, and Warm Springs Telecom, as well as associate members Alaska Tribal Broadband, Nez Perce Tribe, Sacred Wind Communications, and Spokane Tribe Telecom Exchange. NTTA’s mission is to be the national advocate for telecommunications service on behalf of its member companies and to provide guidance and assistance to members who are working to provide modern telecommunications services to Tribal lands.

¹ *In the Matter of Report on the Future of the Universal Service Fund*, Notice of Inquiry, WC Docket No. 21-476 (FCC 21-127, rel. December 15, 2021) (*NOI*)

I. Introduction

The National Broadband Plan (NBP), issued over a decade ago, called for more funding in Tribal areas to meet national broadband goals.² Federal funding for broadband deployment is now certainly at all-time highs with programs such as the Tribal Broadband Connectivity Program (TBCP) administered by the National Telecommunications and Information Administration (NTIA), and this recent level of funding represents a good step towards meeting the NBP's recommendations. Moreover, with these levels of deployment funding, Congress was prescient in requiring the Commission to generate a report on the future of the federal universal service fund. NTTA believes the *NOI* offers a good first step for the Commission and industry stakeholders to begin discussing and debating exactly how these programs fit into the overall universal broadband policy.

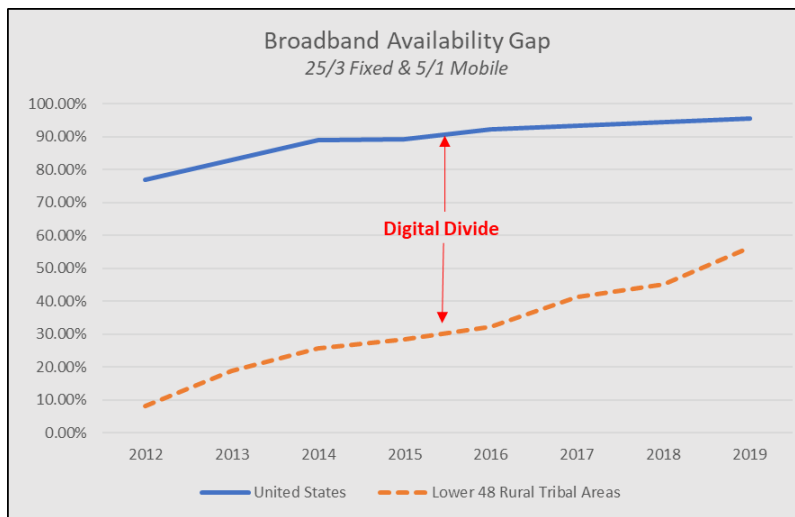
It is vital that the future of USF not only consider deployment funding, but also the *service* aspect of universal broadband service. In other words, once broadband capable networks are deployed, federal universal service funding should take into account the sustainability of the services made available through support for high cost, rural, and Tribal areas. Furthermore, any sustainability funding must recognize the unique challenges of serving rural Tribal areas.

Once networks have been deployed and the services provided are sustainable, affordability must be addressed. Congress, in enacting the Affordable Connectivity Plan (ACP), took a major step in modernizing how affordability should work in the universal broadband availability world. The FCC should similarly modernize the federal Lifeline program and adopt a similar monthly subsidy structure.

² Connecting America, The National Broadband Plan at p. 152 (Box 8-4)

II. THE TRIBAL DIGITAL DIVIDE STILL EXISTS

It is clear that while progress has been made to narrow the digital divide that exists between Tribal areas, especially rural Tribal areas in the lower 48 states, and the rest of the United States, the divide persists. Programs administered by the Commission, the National Telecommunications and Information Administration (NTIA), USDA’s Rural Utilities Service (RUS), and others have provided support and funding that assist in addressing the Tribal digital divide. But, as recent FCC data shows, the problem continues to exist.³



The data is similar for Alaskan villages in rural areas – according to the latest Broadband Deployment Report, 59.3% of the population in these areas has access to 25/3 Mbps fixed terrestrial service and mobile 4G LTE (minimum 5/1 Mbps speed) service, compared to 95.5% of the United States as a whole.⁴

³ Source: FCC Broadband Deployment Reports (latest was released Jan. 19, 2021 covering 2019 data). It should be noted that this deployment data is based on Form 477 filings, which have several well-documented problems, including the “one served, all served” issue.

⁴ In the Matter of Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, Fourteenth Broadband Deployment Report, GN Docket No. 20-269 (FCC 21-18, rel. Jan. 19, 2021) at Figure 9 and Figure 3a. Note – this report reflects Form 477 data as of 12/31/2019

In a report prepared pursuant to the Repack Airwaves Yielding Better Access for Users of Modern Services (RAY BAUM's) Act of 2018, the Consumer & Governmental Affairs, Wireless Telecommunications, and Wireline Competition Bureaus state "while deployment to Tribal lands has increased in recent years, additional work remains to increase deployment to...Tribal areas."⁵ This conclusion is consistent with NTTA's advocacy and reflects the common belief that more work is necessary to close the Tribal digital divide.

The persistence of the Tribal digital divide requires regulatory and funding action on two fronts: deployment funding and sustainability support. While the current high levels of federal broadband funding can assist in addressing deployment problems in Tribal areas, the fact remains that the total amount of funding needed to deploy universal broadband service at certain speeds is unknown. Continuing with this level of unknown is problematic, and NTTA believes the Commission and other policymakers should address this issue. However, given the data available now, the programs in place, and the way funding is being allocated, NTTA urges the Commission and others to consider the unique challenges in deploying networks in Tribal areas when plotting the future of USF.

The Commission rightly notes the difficulties in plotting a course for the future of USF in light of the historical amount of deployment funding available.⁶ While the first and most important step in narrowing the Tribal digital divide is support for network deployment, especially in those Tribal areas where broadband availability is lowest and where Tribal

⁵ *Report on Broadband Deployment in Indian Country*, Submitted to the Senate Committee on Commerce, Science, and Transportation and the House of Representatives Committee on Energy and Commerce, May 2019 at 1

⁶ See e.g., NOI at 30 "In general, the High-Cost program has supported both the initial construction and the ongoing operational expenses for supported networks...Even after the networks supported by these programs are constructed, providers will incur ongoing operating expenses as well as some capital expenses."

governments have received 2.5 GHz licenses via the Rural Tribal Priority Window, the Commission must also focus on the sustainability of those networks, the providers, and the vital services being provided. This, in NTTA's opinion, should be a major focus of federal USF going forward – the Tribal digital divide can only be narrowed and stay that way if broadband services are being provided to all Native Americans in a sustainable fashion.

III. SUSTAINABILITY FUNDING

A. Deployed Networks Must be Sustainable

The Commission notes that federal USF policy may have to shift its focus as federal broadband deployment funding stands at historical levels:

“Given that the networks deployed with funding from the BEAD program and other Infrastructure Act programs will still incur operational costs, particularly in the most difficult to serve areas, should we consider modifications to the High-Cost program to further support ongoing operating and maintenance costs of recently constructed broadband facilities to ensure that rates remain reasonably comparable?”⁷

This statement gets at the real issue facing Tribal areas once networks are deployed, some with the aid of federal deployment funding. The path to universal service does not stop with network deployment – it continues with ensuring the services made available are sustainable, the services available are made affordable to all regardless of income, and all Native Americans have the tools and education they need to take advantage of the affordable services (i.e., digital literacy).

NTTA urges the Commission to address sustainability funding, or the *service* portion of universal *service* policy. The current programs in place for service in areas served by rural

⁷ NOI at 32

providers – High Cost Loop Support (HCLS) and Connect America Fund Broadband Loop Support (CAF BLS) – have mechanisms that help in addressing the sustainable provision of broadband services. However, in the past few years, the focus of the CAF BLS program has drifted somewhat as the Commission added deployment obligations as a condition of receiving support. NTTA believes the Commission should shift the focus of the federal USF programs back to their original purpose – to ensure that *“consumers in all regions of the Nation including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.”*⁸

Universal service support has long ensured that the rates necessary for carriers to charge for local, and later broadband, services were affordable. This was accomplished by offsetting the high costs of service provision incurred by providers serving high cost rural, and Tribal, areas via USF support. Recipients of USF support were to *“use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Any such support should be explicit and sufficient to achieve the purposes of this section.”*⁹ (emphasis added) Thus, mechanisms exist to ensure sustainability of services provided by current ILECs; now the Commission should consider this type of support for new, often Tribally-owned, providers serving Tribal lands.

⁸ 47 U.S.C. § 254(b)(3)

⁹ 47 U.S.C. § 254(e)

B. Sustainability Funding for Tribal Areas

In this light, sustainability funding can be defined as universal service support for the ongoing operations, maintenance, and upgrading of broadband networks necessary to ensure services are provided at rates that are reasonably comparable to those available in non-high cost (mostly urban) areas. For Tribal areas, sustainability funding must also recognize the higher costs of serving Tribal areas that the Commission has recognized in the past:

1. When increasing the operating expense limitation for carriers receiving legacy high-cost support that primarily serve Tribal lands, the Commission recognized the increased costs of providing service on Tribal lands, providing several examples that could cause this:
 - Securing rights-of-way and easements to install new broadband facilities, including the consent of multiple owners of allotted lands, as well as the consent of Tribal authorities, the Bureau of Indian Affairs (BIA), and others.
 - Tribal sovereignty issues
 - Tribal hiring preference
 - Requirement that Tribal construction overseen by a Tribal member¹⁰
2. In making Alternative Connect America Model II support offers, the Commission adjusted certain support variables to recognize the “high concentration of low-income individuals [and] few business subscribers in many rural, Tribal areas.”¹¹
3. The Rural Development Opportunity Fund rules included explicit recognition of the higher costs of serving Tribal areas:
 - “To account for the unique challenges of deploying broadband to rural Tribal communities...”¹²
 - “We recognize the difficulty Tribal lands have faced in obtaining broadband deployment...”¹³

The Commission and other stakeholders have expended resources to increase broadband availability in Tribal areas. These resources include grants and other low-cost deployment

¹⁰ *In the Matter of Connect America Fund*, Report and Order, WC Docket No. 10-90 (FCC 18-37, rel. April 8, 2018) at 5

¹¹ *In the Matter of Connect America Fund*, Report and Order, WC Docket No. 10-90 (FCC 18-176, rel. Dec. 13, 2018) at 55

¹² *In the Matter of Rural Digital Opportunity Fund*, Report and Order, WC Docket No. 19-126 (FCC 20-5, rel. Feb. 7, 2020) at 16

¹³ *Id.*, at 28

funding, such as RUS and NTIA-administered programs, to the Commission's grant of 2.5 GHz licenses through the Rural Tribal Priority Window. However, once these resources have been expended or otherwise utilized to deploy broadband networks, the question of sustainability of these networks and the services they make possible cannot be ignored. In short, these networks cannot be allowed to fail.

C. Middle Mile Costs

Middle mile services in many parts of the country, including many rural Tribal areas and especially in Alaskan villages, is either non-existent or prohibitively expensive. These problems are well-documented:

1. The Tribal members of the Commission's Native Nations Communications Task Force stated:
 - Most of Tribal America lacks adequate middle-mile connectivity
 - On Tribal lands, unfortunately, there is no market-based solution for this problem due to the lack of return on investment
 - To resolve barriers to broadband deployment presented by remote Tribal communities, the Commission should develop a plan for funding and deployment to sustainably support middle-mile connectivity¹⁴
2. The Governmental Accountability Office (GAO), in a 2016 report, stated:
 - Tribal lands located far from urban areas may not have middle-mile infrastructure necessary for high-speed internet deployment to their lands
 - Satellite internet is a poor substitute for land-based middle-mile infrastructure because it is slower, less reliable, includes restrictive caps on data usage, and suffers from regular blackout periods¹⁵
3. In a July 2021 Ex Parte filing with the Commission TelAlaska reported extraordinarily high middle mile costs in Alaska: \$5,472 per meg per location.¹⁶

¹⁴ Native Nations Communications Task Force, *Improving and Increasing Broadband Deployment on Tribal Lands, Report to the Federal Communications Commission from the Tribal Members of the Task Force* (November 5, 2019) at 22-23

¹⁵ GAO Report 16-222, *Additional Coordination and Performance Measurement Needed for High-Speed Internet Access Programs on Tribal Lands* (January 2016) at 11

¹⁶ TelAlaska letter to Marlene H. Dortch, Secretary, Federal Communications Commission, Docket No. 16-271, filed July 7, 2021

The Infrastructure Investment and Jobs Act (IIJA) contains a provision to fund middle mile infrastructure that would allocate \$1 billion to support this critical infrastructure. The Middle Mile Broadband Infrastructure Program (MMBI), to be administered by NTIA, is designed to “expand and extend middle mile infrastructure to reduce the cost of connected unserved and underserved areas to the internet backbone.” In the Request for Comment Notice, NTIA asks key questions on how to award MMBI grant funding, such as “how should the Assistant Secretary ensure that middle-mile investments are appropriately targeted to areas where middle-mile service is non-existent or relatively expensive?”¹⁷ This clearly shows the importance of middle mile investment and services, and how pricing of this service is key to providing affordable broadband service.

Affordable middle mile service in Tribal areas is a vital part of ensuring not only that broadband service exists, but also that it results in end user rates that meet the “reasonably comparable” standard. Currently, middle-mile costs are essentially unsupported in the cost-based (i.e., legacy) federal universal service mechanisms. However, middle mile costs are supported in ACAM support “to reflect the fact that rate-of-return carriers may have higher middle mile costs, A-CAM v.2.0 added two connections from each regional access tandem ring to an Internet access point to account for the cost of connecting to the public Internet.”¹⁸ NTTA urges the Commission to revise current high-cost support rules to include support for high middle mile costs.

¹⁷ 87 Fed. Reg. 1126 (January 10, 2022)

¹⁸ *In the Matter of Connect America Fund*, Report and Order, WC Docket No. 10-90 (FCC 16-33, rel. Mar. 30, 2016) at 46

D. Access to Sustainability Funding

As NTTA stated above, as a result of the various and significant investments the United States is making in broadband networks in general, and in Tribal areas specifically, there will soon be many new Tribally-owned networks looking to narrow the Tribal digital divide. The Commission's 2.5 Ghz Rural Tribal Priority Window has, at last count, granted over 292 licenses to use the spectrum in rural Tribal areas.¹⁹ License holders are required to comply with certain construction requirements, meaning networks, in many cases fixed wireless networks capable of providing broadband services, will be deployed within the next few years. Once these networks are deployed, the service providers, many of which will not be traditional eligible telecommunications carriers (ETC) or incumbent local exchange carriers (ILECs)²⁰, will need sustainability support to ensure ongoing services can be provided at affordable rates.²¹

Currently, to receive support from federal high-cost USF programs, a provider must be designated as an ETC either by the state, Tribal government, or the Commission. NTTA expects there to be a non-trivial number of Tribally-owned providers, such as those building out new 2.5 Ghz networks, that will require funding to keep their services up and running. ETC designation can be a significant hurdle for some potential USF recipients; therefore, NTTA recommends the Commission adopt a streamlined ETC designation process for 2.5 GHz spectrum license holders, and other Tribally-owned entities that may require sustainability funding administered by the

¹⁹ See *FCC Approves Additional 2.5 GHz Spectrum Licenses to Serve Alaska Native Communities*, October 29, 2021 News Release

²⁰ NTTA notes that to currently receive federal high-cost support (HCS), a provider must be an ILEC or successor or assign of an ILEC. This eliminates any newly-formed Tribally-owned company from receiving HCS for sustaining deployed broadband networks

²¹ Access to sustainability funding must also be made to current Tribally-owned carriers that have been designated ETCs, but are not ILECs and thus do not currently have access to legacy cost-based USF support

Commission. This process could rely heavily on Tribal governments, the license application process, and other available information to allow these new, and in some cases existing, providers access to vital USF support.

E. Tribal Area Solution

NTTA has long advocated for an additive to federal high-cost USF support to recognize the higher costs of providing service in rural Tribal areas. These factors are discussed above, and have been recognized by the Commission and others, including Congress. The Commission adopted a “Tribal Broadband Factor” (TBF) for ACAM support²² and the recently-concluded RDOF auction²³, where certain factors used in determining support for Tribal areas were adjusted by 25%. For the future of USF and NTTA’s recommended focus on sustainability funding, NTTA urges the Commission to adopt a similar approach for cost-based, or legacy, USF support for providers serving Tribal areas.

In a 2018 filing with the Commission, NTTA proposed a Tribal Area Solution (TAS) that would, among other actions, apply a 25% factor to current cost-based, or legacy, federal USF programs.²⁴ In this proposal, NTTA recommended the following:

1. **CAF BLS** – NTTA recommended an increase CAF BLS funding to Tribal areas served by RoR carriers by reducing the \$42 per month threshold by 25 percent to \$31.50. This will provide more support to the affected carriers, which can then reduce the pressure on customers to be able to pay for this vital service.
2. **HCLS** – NTTA proposed to revise the HCLS mechanism for carriers serving Tribal areas:

²² *In the Matter of Connect America Fund*, Report and Order, WC Docket No. 10-90 (FCC 18-176, rel. Dec. 13, 2018) at 5

²³ *In the Matter of Rural Digital Opportunity Fund*, Report and Order, WC Docket No. 19-126 (FCC 20-5, rel. Feb. 7, 2020) at 16

²⁴ Letter from Godfrey Enjady, NTTA President, to Marlene H. Dortch, Secretary Federal Communications Commission, *National Tribal Telecommunications Association’s Tribal Area Solution for Universal Service Reform*, filed October 25, 2018 in WC Docket No. 10-90 (*NTTA TAS Proposal*)

- The current formula provides for study areas with 200,000 or fewer loops, and for study area costs per loop between 115% and 150% of the national average cost per loop, HCLS covers 65% of the study area loop costs. NTTA proposes to increase this amount to 81.25% (a 25% increase).
- For study areas with loop costs in excess of 150% of the national average, the HCLS covers 75% of the study area's costs. NTTA proposes to increase that to 93.75% (a 25% increase)

These TAS-based USF support increases would be made available to eligible Tribal areas, served by RoR carriers. Any relief provided will be accepted by RoR carriers on a voluntary basis and will be provided for a specific term of years, to be consistent with any other future USF plans adopted by the Commission. The support increase caused by NTTA's proposals will be limited to RoR carriers with service areas consisting of at least 50 percent Tribal areas.

To be clear, the TAS is targeted to current RoR-regulated ILECs and ETCs. Sustainability funding, as described above, for non-ILECs would be a new program focused solely on Tribally-owned providers that are currently deploying broadband networks, or will do so in the future, and require support to maintain those networks and the services provided.

IV. AFFORDABILITY

The Commission seeks comment on how it "can continue to ensure that the Lifeline program and Affordability Connectivity Program effectively achieve...universal service goals..."²⁵ The Affordable Connectivity Program (ACP) provides up to a \$75 monthly benefit for broadband internet access service in Tribal areas and a credit for the purchase of connected devices. Congress, in the IIJA, appropriated \$14.2 billion for the program, meaning that while it will be in place for a fairly lengthy period of time, it will eventually run out of funding absent another

²⁵ NOI at 36

Congressional appropriation. The ACP also expands on the eligibility criteria by adding participation in the Women, Infants, and Children (WIC) program, and enhances eligibility based on household income by increasing the threshold to 200% of the Federal Poverty Guidelines.

NTTA has long argued that the current Lifeline program credits are inadequate for ensuring low-income consumers can access affordable broadband internet access service.²⁶ The current Lifeline credits were developed prior to broadband service being named a universal service.²⁷ Congress, in adopting first the Emergency Broadband Benefit (EBB) program and then extending it via the ACP, recognized that \$9.25 per month, or up to \$34.25 per month for customers living in Tribal areas, was insufficient to ensure vulnerable low-income households have access to vital broadband services.

NTTA recommends the Commission increase the credits available for broadband service through the Lifeline program to levels consistent with the ACP - \$30/month for non-Tribal areas and \$75 per month for Tribal areas. NTTA notes that the 2022 broadband reasonable comparability benchmark rate for areas other than Alaska for 25/3 Mbps service with unlimited monthly capacity is \$75.93 per month (in Alaska the rate is \$131.16).²⁸ Clearly, if the “affordable” rates for 25/3 Mbps service are \$75.93 - \$131.16, the Lifeline credits for non-Tribal households of \$9.25 and for Tribal households of \$34.25 are woefully inadequate.

NTTA also recommends that the Commission expand the Lifeline eligibility criteria to be consistent with the ACP. Currently, the ACP household eligibility criteria are tied to households

²⁶ See e.g., Comments of the National Tribal Telecommunications Association, WC Docket No. 11-42, filed Aug. 31, 2015 at 6-9

²⁷ The Enhanced Tribal credit of \$25/month was established in 2000

²⁸ *Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2022 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers*, Public Notice (DA 21-1588, rel. Dec. 16, 2021)

that (1) qualify for the federal Lifeline program, (2) have income at or below 200% of the Federal Poverty Guidelines, (3) have at least one member who receives free and reduced price school lunch program or school breakfast program benefits, (4) have at least one member who receives a Pell Grant, and (5) have at least one member who receives WIC benefits. These additional criteria would serve to expand the permanent federal Lifeline program once the ACP ends and will make critical broadband services more affordable to a wider range of households.²⁹

V. CONTRIBUTIONS REFORM AND THE BUDGET CONTROL MECHANISM

The Commission seeks comment on ways to address the rise in the quarterly federal universal service contribution (FUSC) factor and make it more stable and sustainable.³⁰ The FUSC is currently 25.2%³¹, after a peak of 33.4% during the second quarter of 2021³², and shows little sign of abating. Since the FUSC is the mechanism by which the federal universal service programs are funded, it acts as a gating mechanism for the overall FUSF budget.

The Commission adopted the Budget Control Mechanism (BCM) to constrain demand on FUSF and maintain a fixed budget for the high-cost programs. This mechanism reduces support that would otherwise go to carriers for providing universal voice and broadband service, and makes receipt of such support unpredictable. While the Commission has in the past waived

²⁹ NTTA notes the trend to increase the minimum broadband speeds necessary to participate in certain federal funding programs (i.e., 100/100 speeds must be provided by recipients of RUS ReConnect Round 3 funding), so increasing the Lifeline credit will become more crucial as more expensive plans become the norm.

³⁰ *NOI* at 44-45

³¹ *Proposed First Quarter Universal 2022 Service Contribution Factor*, Public Notice, CC Docket No. 96-45 (DA 21-1550, rel. Dec. 13, 2021)

³² *Proposed Second Quarter 2021 Universal Service Contribution Factor*, Public Notice, CC Docket No. 96-45 (DA 21-308, rel. Mar. 12, 2021)

application of the BCM³³, it continues to be a lingering threat to the sufficient, predictable provision of support to carriers serving Tribal areas. NTTA understands the need for the BCM – the Commission adopted overall budget constraints for the HCLS and CAF BLS programs and thus a mechanism to address excess demand is necessary.

NTTA urges the Commission to address the main factor in constraining cost-based (legacy) support to RoR carriers – the seemingly ever-rising FUSC. If contributions reform were undertaken, and an alternative method for funding FUSF was adopted, the budget constraint on high-cost FUSF programs could be eased, making additional support available to address the future of USF and enable the elimination of the BCM. This should be one of the major goals of contributions reform and making the quarterly contribution factor more stable and sustainable.

NTTA endorses, as a reasonable step in addressing the FUSC and BCM problems, the plan proposed by the USForward group.³⁴ The USForward plan proposes to assess broadband internet access service revenues, which could result in a FUSC below 4%. This FUSC level would give the Commission an opportunity to ease the constraints and budgets on various FUSF programs, such as high-cost and Lifeline, and enable the adoption of reforms to address the future of USF. Furthermore, it is clear that the Commission can make the changes proposed by USForward without seeking a change in the relevant statutes.

In addition to the USForward proposal, several other plans have been floated recently, including one by Commissioner Carr that would assess revenues collected by certain large

³³ See *e.g.*, *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order (FCC 21-67, rel. June 3, 2021) that waived application of the BCM through June 2022 due to unique cash flow challenges caused by the COVID-19 pandemic. The BCM adjustment for the period 7/1/2021 – 6/30/2022 would have been a reduction of 8.58146%

³⁴ See February 14, 2022 Ex Parte Notice, WC Docket Nos. 21-476 and 06-122, filed by Carol E. Matthey on behalf Ad Hoc Telecom Users Committee, INCOMPAS, NTCA – The Rural Broadband Association, Public Knowledge, the Schools, Health & Libraries Broadband (SHLB) Coalition, and the Voice on the Net Coalition

technology companies.³⁵ This framework, and others, would likely require Congressional action, but is worth analyzing fully – there are clearly stakeholders in the broadband market that are not contributing towards universal service when they obviously benefit from this policy.

VI. DIGITAL LITERACY

Once deployment, sustainability, and affordability have been addressed, the next step in the path to full universal broadband service is digital literacy and equity. In this light, digital literacy and equity means that people who would benefit the most from broadband services are aware of the services, have access to, and the use of, affordable information and communication technologies, and have the skills necessary to find, evaluate, organize, create, and communicate information.

The IIJA contains the Digital Equity Act that will award funding to states for implementing digital equity plans, among other items. In a fashion similar to deployment funding, once digital equity and literacy is being addressed via one-time grants, NTTA believes it will be up to providers and the Commission to ensure the level of digital literacy and equity reached is made sustainable. To this end, NTTA recommends the Commission explore methods to fund digital literacy and equity that meets the needs of all Americans in the long term.

CONCLUSION

Congress was correct in requiring the Commission-generated report on the future of USF, and NTTA appreciates the opportunity to assist the Commission with this vital endeavor. NTTA

³⁵ See *NOI*, Statement of Commissioner Brendan Carr

has long advocated for the reform reflected in the comments above, including the Tribal Area Solution proposal and increasing the federal Lifeline credit for Tribal areas, and the Commission should consider adopting these proposals as concrete steps to address the Tribal digital divide and affordability of broadband services for low-income households. Sustainability funding must be considered, especially as federal funding for broadband deployment is at historical highs, and these networks deployed in high-cost and Tribal areas must be given every chance to succeed. By re-focusing federal high-cost USF programs on service, the Commission can ensure the networks being deployed today can survive in the long term.

Respectfully Submitted,

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February 17, 2022