

In addition to comments expressed earlier in this process, we are providing the following expert recommendations:

- The Tower Construction Notification System (TCNS) is not designed to document success stories of tribal historic properties that have been preserved and protected. As stated in other comments in this docket, at least one Indian tribe has provided examples of how the TCNS process has worked to save their respective tribal historic properties. If the FCC would like to judge the value and success of working with Tribal Nations using TCNS and other tribal outreach and consultation endeavors, then a process to capture the success of hardworking Tribal Nations would need to be developed and agreed upon by all stakeholders.
- We are concerned about the locations of two “tribal consultation meetings.” On June 23 the FCC announced Tribal consultation meetings related to this docket would be held in Eugene, Oregon (July 20); Broken Arrow, Oklahoma (July 24); and Knoxville, Tennessee (July 25). NATHPO supports tribal outreach consultation, but unfortunately, two of these locations are not within reasonable distance from most Tribal Nations: Eugene and Knoxville. Most other federal agencies that work with and consult with Tribal Nations conduct their outreach meetings in such locations as Portland, Oregon, or Seattle, Washington, rather than Eugene. It is our understanding that at least one Tribe will travel a great distance to the Eugene meeting but not each Tribe has financial and staff resources to make such a trip. Also, rarely, if ever, are tribal consultation meetings held in Knoxville because of the lack of nearby Indian tribes.
- NATHPO would like to promote and participate in regular meetings of Tribal Nations, industry representatives, FCC staff, and other stakeholders, to discuss and resolve some of the emerging issues related to a maturing TCNS process and changing infrastructure deployment facilities.

Thank you for your consideration of these comments.



D. Bambi Kraus, President
NATHPO
PO Box 19189
Washington, DC 20036