


COMMENT FORM FOR: SUSIE ALLEN, CHERIE MOOMAW, & MS. MARCHAND - ID# 25213

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Name	SUSIE ALLEN, CHERIE MOOMAW, & MS. MARCHAND
Organization Company	CONFEDERATED TRIBES OF THE COLVILLE RESERVATION AND;THE AFFILIATED TRIBES OF NORTHWEST INDIANS
Address	PO BOX 150
City, State, Zip Code	NESPELEM WASHINGTON 99138
Email	
Primary Phone #	Fax #
Secondary Phone #	

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Description	Members of these organizations attended and testified at the January 5 public comment hearing, and provided the attached written comments.
Attachments	 CCT and ATNI Comments on Qwest-CenturyLink Merger (2623123_1).PDF

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of

DOCKET UT-100820

**QWEST COMMUNICATIONS
INTERNATIONAL INC. and
CENTURYTEL, INC.**

**for Approval of Indirect Transfer of
Control of Qwest Corporation, Qwest
Communications Company LLC, and
Qwest LD Corp.**

**COMMENTS OF THE CONFEDERATED TRIBES
OF THE COLVILLE RESERVATION**

and

THE AFFILIATED TRIBES OF NORTHWEST INDIANS

January 3, 2011

I. INTRODUCTION

The Confederated Tribes of the Colville Reservation ("Colville Tribes") respectfully provides these comments on the proposed merger between CenturyLink, Inc. ("CenturyLink") and Qwest Communications International, Inc. ("Qwest"). The Affiliated Tribes of Northwest Indians ("ATNI") joins the Colville Tribes in these comments in their entirety.

The Colville Tribes is aware that on December 23, 2010, the parties filed a proposed settlement agreement ("Settlement") with the Washington Utilities and Transportation Commission ("WUTC" or the "Commission") where, among other things, the parties agree to 28 conditions. Although the Colville Tribes believes that the agreed-to compromise conditions are an improvement to the merger as initially proposed, the Colville Tribes remains concerned that the agreed-to conditions do not adequately address the unique service delivery and other issues faced by the Colville Tribes and other Indian tribes in Washington State.

The Colville Tribes and ATNI do not believe that the proposed Settlement is in the public interest and object to the Commission's approval of the Settlement and the merger in absence of further changes or Commission-imposed conditions. Specifically, the parties should amend the Settlement, or the Commission should impose conditions, as the case may be, to incorporate the following changes:

- (1) add the Colville Reservation communities of Keller (an unserved area) and Inchelium (an underserved area) to the five communities identified in agreed-to Condition 14 for which CenturyLink will enable broadband, and consult with the Colville Tribes in the design, engineering and build out;
- (2) require CenturyLink to establish a Tribal-Liaison office to provide Indian tribes with a direct point of contact for quality of service issues, inquiries, or other matters that arise within tribal lands that are dependant on or otherwise implicate CenturyLink's operations;
- (3) establish a training program available to Indian tribes to enable tribal personnel to service and makes repairs to CenturyLink and legacy switches and infrastructure;
- (4) undertake promotional and educational activities, at CenturyLink's sole expense, to inform residents on the Colville Reservation and other tribal lands in Washington State of the Enhanced Lifeline and Link-Up Assistance programs available for tribal members and
- (5) require CenturyLink to report to the Commission on areas served by CenturyLink within Indian lands

II. BACKGROUND ON COMMENTATORS

A. The Colville Tribes

Although now considered a single sovereign Indian tribe, the Confederated Tribes of the Colville Reservation is, as the name states, a confederation of twelve aboriginal tribes and bands from all across eastern Washington State. The present day Colville Reservation is located in north-central Washington State and was established by Executive Order in 1872. At that time, the Colville Reservation consisted of all lands within the United States bounded by the Columbia and Okanogan Rivers, roughly three million acres. In 1891, the North Half of the 1872 Reservation was opened to the public domain. The North Half consists of approximately 1.5 million acres between the Canadian border and the northern boundary of the present day Reservation. The Colville tribal members exercise reserved hunting, fishing, and gathering rights on the North Half and the Colville Tribes maintains strong political and economic interests in this area.

Today, the Colville Tribes has approximately 9,400 enrolled members, making it one of the largest Indian tribes in the Northwest, both by geographic area and enrollment. About half of the Tribes' members live on or near the Colville Reservation. Between the tribal government and the Tribes' enterprise division, the Colville Tribes collectively accounts for more than 1,700 jobs—making it one of the largest employers in north central Washington State.

B. ATNI

ATNI is a nonprofit intertribal organization representing 57 tribal governments from Washington, Oregon, Idaho, southeast Alaska, northern California and western Montana. Among other activities and purposes, ATNI provides a forum for sharing information on matters of interest to its member Tribes, to develop consensus on matters of mutual importance, assist member Tribes in their governmental and programmatic development consistent with their goals for self-determination and self-sufficiency, and provide for effective public relations and education program with the non-Indian communities. Through its conferences, forums, networks and alliances, ATNI represents and advocates for the interests of its member Tribes to national Indian and non-Indian organizations and governments.

ATNI is governed by standing committees, which recommend resolutions and other policy positions for consideration by ATNI's general membership. One of the standing committees is the Energy and Telecommunications Committee, which monitors and adopts policy positions on issues related to telecommunications and broadband in Indian country. ATNI's membership includes 29 federally recognized Indian tribes in the State of Washington, including the Colville Tribes.

III. THE COLVILLE RESERVATION, BROADBAND AVAILABILITY, AND CONCERNS WITH CENTURYLINK AND QWEST

A. Colville Reservation Demographics and Broadband Availability

The Colville Reservation is located in a rural isolated area in north-central Washington. The Colville Reservation is bounded on the west by the Okanogan River and on the south and east by the Columbia River, and the Reservation encompasses parts of both Okanogan and Ferry counties. The Colville Reservation encompasses approximately 2,100 square miles and has a population density of 3.6 persons per square mile. By comparison, the Colville Reservation is slightly larger than the State of Delaware.

The Colville Reservation is divided into four districts: Omak, Nespelem, Keller and Inchelium. The community of Inchelium, located in the northeast portion of the Colville Reservation, is 86 road miles from Spokane, Washington—the nearest population center of over 20,000 residents. While many federal agencies define rural communities as those with populations of 50,000 or less, the entire Colville Reservation has less than 10,000 people. CenturyLink provides some DSL and telephone service to the Inchelium. CenturyLink provides only telephone service to Nespelem and Keller. Qwest provides some DSL and telephone service to the Omak and Coulee Dam communities.

The Colville Reservation is home to 9,500 residents, which include both tribal members and non-Indians. Of those residents, 3,300 households are at or below the poverty line. More than 30 percent of the communities live in poverty and nearly 65 percent of the working population of the Colville Tribes are unemployed.

B. Broadband Infrastructure and Availability for the Residents of the Colville Reservation

The Colville Reservation is 20 years behind the general population when it comes to broadband connectivity. Most residents of the Colville Reservation do not have access to terrestrial broadband. The broadband infrastructure that does exist is located primarily in Omak and Coulee Dam, both of which are situated on the borders of the Colville Reservation near non-Indian communities.

The Colville Tribes' lack of terrestrial broadband affects health service, law enforcement, educational capacity, tribal governance, economic development, tourism, homeland security, entrepreneurship, and community quality of life compared to non-isolated urban communities.

As an illustration of the negative impact of the lack of broadband capacity on the Colville Reservation, officials from the Indian Health Service ("IHS") recently approached the Colville Tribes proposing to use the Tribes' health facility in Nespelem as a regional IHS service hub for the northwest region, which would include the four communities on the Colville Reservation, the IHS facilities on the Spokane and Kalispell Reservations, and the urban health clinic in the City of Spokane. Because the incumbent provider, CenturyLink, could not provide the requisite DS-3

capacity connection in Nespelem, the Indian Health Service has put this regional service proposal on hold, forestalling an effort to improve healthcare services throughout the northwest region.

Broadband is also critical to education. Educational opportunities that are available to the general public are largely non-existent for Indian communities. Many higher educational institutions offer online college preparation, online degrees, and provide a number of different choices for interested students. However, the Colville Reservation has never enjoyed this luxury and the Tribes believes the lack of broadband is a contributing factor to the heightened drop-out and unemployment rates of our Indian citizens.

Finally, attracting and retaining private investment on Indian lands is nearly impossible without reliable broadband service. The era of phone calls is quickly diminishing as more and more companies rely upon online communications. Since the vast majority of the Colville Reservation does not have the connectivity to the outside world, many entrepreneur efforts are focused on fire management and wood products.

C. Colville Tribes' Concerns and Past Experience with CenturyLink and Qwest

The Colville Tribes pay a substantial amount to both CenturyLink and Qwest to maintain a voice network for all tribal government and enterprise entities, both within and outside the Colville Reservation. The Colville Tribes pays Qwest and CenturyLink to use their 48 T-1 lines, 150 standard business lines, and various other network infrastructure – most of it antiquated. The Colville Tribes pays CenturyLink approximately \$180,000 and Qwest \$156,000 annually for the use of this infrastructure. Despite the substantial business the Colville Tribes provides them, CenturyLink and Qwest have often been unresponsive to out-of-service circuits and have allowed critical circuits relied upon by the Tribes' correctional facilities, health clinics, and fish & wildlife enforcement to be inoperative for up to 72 hours prior to dispatching repair personnel.

Both CenturyLink and Qwest have failed to provide even basic telephone service to areas of the Colville Reservation. Phone service has been established by the Colville Tribes in some of these areas at the Tribes' expense. The current copper infrastructure that does exist on the Colville Reservation is too antiquated to provide even DSL connectivity. One such area exists in the Rebecca Lake area of the Reservation, which is Qwest territory.

Much of CenturyLink's infrastructure and office locations on the Colville Reservation are located on land held in trust by the United States for the benefit of the Colville Tribes. CenturyLink's occupancy of these lands are required to be secured by rights-of-way or leases between the company and the Colville Tribes that are approved by the Department of the Interior. CenturyLink has at least one expired lease with the Colville Tribes and has failed to provide data and lease information in accordance with Colville Tribal law, or pay fair market value for the use of the Colville Tribes' lands for leases and rights-of-way. The Colville Tribes has requested information to ascertain the scope of CenturyLink's compliance with Colville Tribal law and CenturyLink has proven either unable or unwilling to provide this information, or has disregarded the request as a priority.

IV. COLVILLE TRIBES' CONCERNS WITH THE PROPOSED MERGER AND WITH THE PROPOSED SETTLEMENT

The Colville Tribes agrees with the overriding concern expressed in testimony by WUTC staff in its September 27, 2010 testimony that “[l]eft entirely to market forces, the company may focus its broadband activity on urban markets and neglect rural markets,” which could result in a “widening gap in broadband infrastructure between rural and urban areas served by CenturyLink after the acquisition.” (Liu Testimony, at 5, lines 11-15.) As noted in Part III(C), above, CenturyLink and Qwest have a proven track record of providing poor service and neglecting the infrastructure needs of the Colville Reservation that they currently serve. The Colville Tribes has reason to believe that these concerns will only become more apparent if the Settlement is approved in its current form, or the merger is otherwise approved without additional conditions.

The Colville Tribes and ATNI do not believe that the Settlement as proposed is in the public interest. Both the Colville Tribes and ATNI object to the Commission approving the Settlement and the merger unless the parties incorporate the following changes into the Settlement, or the Commission imposes the changes as conditions to the merger.

A. Expand Broadband Commitment to Include the Communities of Keller and Inchelium

Condition 14 of the proposed Settlement Agreement requires CenturyLink to invest at least \$80 million in retail broadband infrastructure in Washington State over a five year period, of which 33 percent (or \$26.4 million) must be invested in unserved and underserved areas. In addition, CenturyLink must enable broadband in five communities in the state, one of which is Nespelem. Nespelem is one of the four main communities on the Colville Reservation.

Although the Colville Tribes appreciates the efforts of the WUTC staff in securing this commitment from CenturyLink to mitigate concerns about post-merger broadband deployment, the Colville Tribes does not believe that the commitment goes far enough to address the longstanding issues that the Colville Tribes has had with CenturyLink and Qwest’s provisions of service on the Colville Reservation.

As noted above, the Colville Tribes is among the largest employers in north central Washington. Thousands of residents depend on the Colville Tribes’ governmental services for law enforcement, health, and other essential services, all of which are heavily dependant on broadband. CenturyLink provides DSL service to some residences in Inchelium and provides no broadband service whatsoever to Keller. Health clinics and satellite police stations are located in both communities, and lack of broadband capability impairs the Tribes’ ability to provide these essential services.

The Colville Tribes recommends that the parties incorporate the following changes to Condition 14 to incorporate Inchelium and Keller into CenturyLink’s investment in unserved and underserved areas:

14. Broadband Commitment

In addition to the Qwest AFOR and CenturyTel/Embarq merger broadband commitments, CenturyLink shall invest no less than \$80,000,000 (eighty million dollars) in retail broadband infrastructure in Washington over a five year period, beginning January 1, 2011. No less than thirty-three percent (33%) of this amount shall be invested in unserved and underserved areas. In addition to the 33% of the total investment that is directed to unserved and underserved areas, CenturyLink will enable broadband in the following CenturyLink central offices: Clearwater, Glenwood, Willard, Nespelem, Inchelium, Keller and Eureka. CenturyLink shall consult with the Confederated Tribes of the Colville Reservation in all phases of enabling broadband in the Nespelem, Inchelium and Keller areas. This investment will count toward the \$80,000,000 total.

For purposes of this Settlement Agreement, "unserved" means either an area that has no wireline broadband service from any carrier, or no wireline service available from the CenturyLink ILECs or Qwest; "underserved" means an area with wireline broadband service but only at download speeds of 4 Mbps and upload speeds of 1 Mbps or less; and "area" means one or more living units. CenturyLink may invest less than thirty-three (33%) of the total amount in unserved or underserved areas with Commission approval, after a showing that such investments would not be appropriate based on deployment costs, availability of other broadband services in those areas or other pertinent factors, but any such Commission approval shall not impact the total amount of the commitment.

Within 180 days of the Transaction's close, CenturyLink will file with the Commission, with copies to Commission Staff and Public Counsel, a separate confidential filing identifying the initial wire centers targeted under the commitment, including those areas that qualify as unserved or underserved, as well as the estimated living units that will be enabled or upgraded as to speed. Company representatives will meet with Commission engineering staff and Public Counsel to review this report. The Parties agree that as part of its initial broadband evaluation CenturyLink will evaluate each of the unserved and underserved areas, with an emphasis on those Qwest and CenturyLink ILEC wire centers with 85% broadband availability or less, to determine if the combined networks overcome the existing challenges in provision of broadband services. CenturyLink shall consult with Indian tribes in conducting this evaluation. These findings will be used in developing CenturyLink's broadband investment plan and will be reviewed with Commission Staff and Public Counsel as part of the post-Transaction meeting.

For a period of five years, or until all capital commitments have been expended under this condition, CenturyLink will file with the Commission annually on the anniversary of the Transaction's close a confidential written report on the broadband deployment by wire center accomplished in the previous year, including the expenditure per wire center, the number of living units enabled or upgraded as to speed, and the broadband speeds available in each wire center. The report shall contain the same Washington-specific information as is currently reported under the Qwest AFOR broadband reporting requirement. The Parties agree to work collaboratively to develop a report format to comply with this provision.

CenturyLink will file with the Commission, with copies to Commission Staff and Public Counsel, a plan for broadband deployment annually, to begin within 60 days of the anniversary date of the closing of the Transaction and thereafter submitted on the anniversary of the Transaction's closing date, including the number of living units to be enabled or upgraded. In addition, CenturyLink will meet with Commission Staff and Public Counsel to review the annual broadband plan and the annual deployment report.

B. Establish a Tribal-Liaison Office

To mitigate ongoing issues that the Colville Tribes (and other Washington State tribes) have experienced with CenturyLink and Qwest services, CenturyLink should establish or be required to establish a Tribal Liaison Office. A Tribal Liaison Office would provide Indian tribes with a direct point of contact to address quality of service issues, inquiries, or other matters that arise within tribal lands that are dependant on or otherwise implicate CenturyLink's operations. The experiences of the Colville Tribes are instructive as to why such an office should be established.

As described in Part III(C), above, the Colville Tribes has received little cooperation from CenturyLink in obtaining information on CenturyLink's infrastructure on the Colville Reservation. Specifically, the Colville Tribes has discovered 15 to 20 miles of dark fiber on tribal trust lands that the Tribes confirmed was installed by CenturyLink. The Colville Tribes has received little cooperation in obtaining information from CenturyLink regarding this dark fiber. The establishment of a Tribal Liaison Office within CenturyLink would ensure that these and similar inquiries are responded to and given the priority they deserve.

Also, because the Colville Tribes possesses general civil legislative and adjudicative jurisdiction within the boundaries of the Colville Reservation, the Colville Tribes has a direct role in the siting of broadband infrastructure within the Reservation. The Colville Tribes has developed its own strategic plans for expansion of broadband services within the Colville Reservation. A Tribal Liaison Office would facilitate these and other discussions with appropriate CenturyLink officials on how these plans might move forward.

Accordingly, the Colville Tribes recommends that the parties incorporate the following new paragraph c to Condition 16:

- c. For a period of at least five years from the Transaction's close, CenturyLink shall establish a Tribal Liaison Office to address quality of service, strategic planning, or other issues raised by Indian tribal governments within CenturyLink's service area. Within 90 days of the Transaction's close and after consultation with applicable Indian tribes, CenturyLink shall (i) ensure that the Tribal Liaison Office is adequately staffed and operational and (ii) provide the Commission with contact information for the Office and a description of how the Office is organized within CenturyLink's management structure.**

If the parties do not agree to incorporate this provision, the Colville Tribes respectfully requests that the Commission impose this condition or a comparable condition should it approve the merger.

C. Establish a Training Program for Indian Tribes and Tribal Personnel

The Colville Tribes have invested heavily into current reservation-wide voice and data network, which are primarily connected via CenturyLink and Qwest T1 lines. The Colville Tribes manages and maintains the 17 private branch exchanges to provide voice services to all governmental entities and enterprises throughout the Colville Indian Reservation, using expensive and antiquated copper facilities (T-1s) through CenturyLink and Qwest. The Colville Tribes' technical staff are Nortel and BICSI trained/certified to provide service in all aspects of telecommunications (i.e., central office, outside cable plant, inside wiring, fiber/copper/wireless installation and maintenance). With the CenturyLink office locations off-reservation, repairs of circuits on the reservation could be handled more expeditiously and at lower cost to the ILECs if the Colville Tribes' own technical staff could be utilized. Both ILECs currently contract out all their outside cable plant trenching to a company based in Spokane. These services could be contracted to the Colville Tribes, who currently have personnel and equipment for such services, at a lower cost.

Accordingly, the Colville Tribes recommends that the parties include the following new paragraph in Condition 12 of the Settlement Agreement:

12. Plan for Evaluation and Replacement of Switches

CenturyLink will provide to Commission Staff and Public Counsel on the first anniversary of the Transaction's close, a status report on CenturyLink's switching infrastructure in the state, which will identify any switch replacements, upgrades or retirements made in the prior calendar year as well as any that are known for the upcoming calendar year.

In addition, CenturyLink shall develop and implement a program whereby CenturyLink shall provide training to Indian tribes and their personnel, at the tribes' request, to provide repairs or service to switches or other CenturyLink infrastructure. Centurylink shall consult with Indian tribes in the development of this program and shall provide to the Commission Staff and Public Counsel with a status report on the program on the first and second anniversary of the Transaction's close.

If the parties do not agree to incorporate this provision, the Colville Tribes respectfully requests that the Commission require this condition should it approve the proposed merger.

D. Promote Tribal LifeLine and Link-Up Program Benefits to Residents of Indian Lands

Condition 26 of the proposed Settlement requires CenturyLink to meet and work collaboratively with Commission Staff, Public Counsel and DSHS to evaluate the current WTAP outreach program to enhance customer awareness and increase participation in the program. Condition 26 also requires CenturyLink ILECs and Qwest to institute a program for the treatment of consumer upheld complaints. The only reference to Indian tribes is in paragraph c, which requires CenturyLink to notify WTAP, Lifeline, and tribal agencies of a name change if and when it occurs.

Residents on Indian lands are eligible for additional benefits under the Tribal Lifeline Assistance program that can enable them to receive basic monthly telephone service at their primary residence for as little as one dollar a month. Notwithstanding the federal law requirement that carriers "publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service," CenturyLink has failed to adequately inform households on the Colville Reservation of these special Lifeline and Link-Up program benefits for residents of Indian lands. See FCC Order 00-208.

In addition, the Colville Tribes and other tribes have also experienced a number of other problems. For example, in determining eligibility for the general Lifeline and Link-Up programs, ILECs confirm eligibility with the State DSHS offices. If the names of the eligible residents do not appear on the State DSHS lists, the individuals are not contacted about the benefits of the program. The Tribal Lifeline and Link-Up programs, however, recognize Bureau of Indians Affairs' General Assistance, Tribally-Administered Temporary Assistance for Needy Families programs, and other Indian-specific benefit programs, many of which are administered by the tribes themselves. Unless the ILECs affirmatively work with or contact tribes to determine who might be eligible under the Tribal Lifeline and Link-Up eligibility criteria, these residents will not be in a position to take advantage of these programs. Based on the Colville Tribes' experience, whatever actions that CenturyLink and Qwest have taken to promote these programs on the Colville Reservation have not been effective.

The Colville Tribes, therefore, recommends that the parties incorporate the following new paragraph d in Condition 26:

d. CenturyLink agrees to establish a program, at its sole expense, to promote the Tribal Lifeline and Link-Up Assistance programs specifically for residents on Indian lands. Within 60 days of the Transaction's close, CenturyLink shall consult with WTAP and Indian tribal governments that have Indian lands that are or will be served by CenturyLink to implement this program. This program shall remain in effect for five years after the date of implementation.

If the parties do not agree to incorporate this provision, the Colville Tribes again requests that the Commission require this or a comparable condition should it approve the proposed merger.

E. Reporting on Tribal Service Areas

Finally, the Colville Tribes believes it is appropriate to require CenturyLink to track and file annually with the Commission a list of Indian tribes in Washington State, with accompanying maps, where CenturyLink provides services. This could be accomplished by the inclusion of a new paragraph at the end of Condition 4 that reads:

In addition, for a period of five years after the Transaction closes, CenturyLink shall track and file annually a report identifying the Indian tribes in Washington State where CenturyLink provides within the tribes' Indian lands, together with accompanying maps for each tribe.

If the parties do not agree to incorporate this provision, the Colville Tribes respectfully requests that the Commission require this condition should it approve the proposed merger.

V. CONCLUSION

As recognized by Commission staff in prior testimony, if the CenturyLink-Qwest merger is approved, CenturyLink will be the largest telecommunications carrier in Washington State and its legacy operations will change significantly in its efforts to realize the "synergies" that both entities have cited in their respective applications. The Colville Tribes has a unique reliance on CenturyLink's continued operations and have experienced serious service deficiencies that have negatively impacted the health and welfare of the Colville Tribes and its citizens.

The Colville Tribes asks that the parties incorporate the changes set forth in these comments to the proposed Settlement. If the parties are not willing to do so, the Colville Tribes requests that the Commission impose these changes as conditions to any approval of the proposed merger.

Sincerely,

Michael O. Finley

Michael O. Finley
CHAIRMAN
Confederated Tribes of the
Colville Reservation

Brian Cladoosby

Brian Cladoosby
PRESIDENT, Affiliated Tribes of
Northwest Indians

Susie Allen

Susie Allen
CO-CHAIR, Energy and Telecommunications
Committee, Affiliated Tribes of Northwest Indians