



# Native Link

## Communications

*IP Based Fiber-Optic Solutions for Residential, Business and Enterprise Customers*  
*Specialized Wireline and Wireless Communications Consultants*

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MARCH 1, 2012

Chairman Jeffrey D. Goltz  
Commissioner Pat J. Oshie  
Commissioner Phillip B. Jones

Washington State Utilities & Transportation Commission  
1300 S. Evergreen park Drive SW  
P.O. Box 47250  
Olympia, WA 99504-7250  
Facsimile:(360) 586-1150

WUTC Honorable Commissioners,

I am writing this letter in reference to the Confederated Tribes of the Colville Reservation and their communications infrastructure. I am the Vice President of Technology for Native Link LLC., a communications consulting company working throughout the United States and Canada with Native American and First Nation communities.

My background includes fourteen years with major LEC's across the country and management experience with two of them. I spent time as a manager for the hurricane Katrina and Wilma Disaster cleanup working for Bell South and Sprint. As you can imagine, I have seen my fair share of damaged outside plant. It should be noted that I spent a number of years working specifically with outside plant engineering, construction, installation and repair.

During my visit with the tribe last month, the Project Manager for the tribal IT department took the time to drive a business associate and myself through the territory. We had the opportunity to observe the outside plant conditions and I must say that what I observed was similar to the buried plant conditions in much of the disaster-ridden areas after a hurricane. There were a number of pedestals that were damaged so badly they no longer closed, leaving the closure separated and exposed. Some of the pedestals were leaning, damaged and looked as if they had been run over. We observed that these pedestals were housing fifty to as much as two hundred and fifty pair of telephone copper cables.

The effect on the plastic insulation when exposed to the elements is extreme. When the plastic begins to crack from the sun, moisture and temperature change, the cable becomes susceptible to outside influences such as power influence, cross talk, grounds and shorts. According to the IT department, effects like these have been experienced for a very long time.

It is important to note that Native link observed no efforts being made by telecom repair/maintenance personnel. There are a number of temporary efforts that a technician will make while maintaining his outside plant condition such as plastic covers taped over the damaged pedestals... We observed observed none!

Old aerial drops were observed hanging from telephone poles and open areal terminal/closures. Native Link was left to conclude that there has been no "real efforts" made in maintaining the outside plant condition for some time.

Native Link conducted an overall assessment of the tribal districts and found them all with inadequate services. To our surprise, we found residence with no "access" to telecommunications services at all and "most" with little to no data service options.

In short, it is Native link's belief that the local services providers have obviously decided not to invest within the tribal territory. Moreover, they haven't even made the necessary efforts in maintaining desired outside plant conditions to sustain what they do have.

Respectfully,

A handwritten signature in cursive script, appearing to read "M. Paul Walk".

Paul Walk, Vice President of Technology

Native Link LLC.

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CC: FCC Chairman Julius Genachowski  
FCC Commissioner Robert McDowell  
FCC Commissioner Mignon Clyburn  
FCC Office of Native Affairs & Policy Chief, Geoffrey Blackwell  
Colville Business Council  
Jim Ronyak, Colville Tribe IT Division Director



## Confederated Tribes of the Colville Reservation



### CenturyLink Damaged Pedstal Pictures



CenturyLink Damaged PEDs located less than ½ Mile from their Nespelem Central Office and one by the Nespelem Community Center.



CenturyLink Damaged PED on Highway 21 – State Route in the Keller reservation district.

Located between Keller Park and the Mt. Tolman, Peter Dan Road.