

NATIONAL CONGRESS OF AMERICAN INDIANS



January 9, 2004

Secretary Gale Norton
United States Department of the Interior
1849 C Street NW
Washington, DC 200240

Special Trustee Ross Swimmer
United States Department of the Interior
1849 C Street NW
Washington, DC 200240

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Re: Request for Extension of Time for Comments on "To- Be" Trust Business Model

Dear Secretary Norton and Special Trustee Swimmer

In an announcement dated December 30, 2003, the Office of the Special Trustee for American Indians requested comments on an electronic draft of the "To Be" Trust Business Model, and set a deadline of January 30, 2004. On behalf of the National Congress of American Indians, I request that the Department extend the deadline for an additional 60 days.

An extension will allow the Department an opportunity to adequately distribute the electronic draft version. The document that NCAI received has not yet been distributed to many of the tribes who participated in the Department's fall and winter informational meetings. Moreover, the December 30th announcement stated that the Department would make the electronic draft available on the Department's website and the Trust Fix website; however, the websites have yet to post this information.

The document's size also demands more time for adequate review and comment. It is a challenge for any office to adequately review and formulate feedback on a highly technical 1,200 page document, much less in such a short period of time. Moreover, as is the case with most offices, this time of the year places a number of demands on tribal staff.

Finally, and most importantly, while we appreciate the Department's concern with carrying out the timeline to develop the "To Be" Trust Business Model, it has always been the NCAI's position that tribal perspectives are the most necessary element in the resolution of the trust issue in light of the significant impact that the trust business practices have on tribes. The electronic draft includes revisions based on the Department's dialog with tribes that attended informational meetings in the fall and winter. This coming week the Department will hold a final informational meeting in Rapid City, SD. At the Rapid City meeting additional dialogue will occur, but the electronic version currently in distribution does not reflect this input.

We would like to thank the Department for its positive consideration of this request, and look forward to continue working with the Department on the To Be Business Process'. Please feel free to utilize the NCAI's resources to effectively and expediently communicate with tribes.

Sincerely,

Tex G. Hall
President