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**VIA EMAIL: [tribal-consultation@omb.eop.gov](mailto:tribal-consultation@omb.eop.gov)**

October 4, 2010

General Services Administration  
FAR Secretariat (MVPR)  
1800 F Street NW Room 4041  
Washington, DC 20405

RE: Consultation Comments  
FAR Case 2009-038; Docket 2010-0095; Sequence 1

Dear Sir/Madam:

Goldbelt, Incorporated is pleased to participate in to the Federal Acquisition Regulatory (FAR) Council's Tribal consultation process regarding implementation of Section 811 of the National Defense Authorization Act for Fiscal Year 2010.

Goldbelt is an Urban Village Corporation for Native Americans living in and around Juneau, Alaska. Under the 1971 Alaska Native Claims Settlement Act, Urban Corporations were given some land, but no cash to work with. Because of this limited original capitalization, Goldbelt is highly dependent on the opportunities that have been available through the SBA's 8(a) program.

Although Goldbelt cannot outline detailed comments on the implementation of Section 811 at this time, we are submitting this letter to notify the FAR Council that Goldbelt has reviewed the position of the Native American Contractors Association (NACA) on this issue and that NACA's written and oral comments are representative of Goldbelt's own views or comments.

Without the clarifications to Section 811 that NACA has proposed, the impact of the implementation of Section 811 will have a dramatic chilling effect on the ability of Native enterprises to contract with the Federal Government.

Please contact me at 907-790-1440 or at [gary.droubay@goldbelt.com](mailto:gary.droubay@goldbelt.com) if you would like to discuss this further.

Sincerely,

J. Gary Droubay  
President & CEO

CC: Sarah L. Lukin, Native American Contractors Association