

ALASKA NATIVE VILLAGE  
CORPORATION ASSOCIATION

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November 24, 2015

Emily Gaffney  
Regulations Specialist  
Division of Banking & Securities  
Department of Commerce, Community & Economic Development  
P.O. Box 110807  
Juneau, AK 99811-0807

Re: Comments on Proposed Changes to Regulations Under Title 3, Chapter 8, Alaska Administrative Code – 3 AAC 08.920(c) Amendment to Establish Fees for Certain ANCSA Corporations

Dear Ms. Gaffney,

The Alaska Native Village Corporation Association (ANVCA) is respectfully requesting full review and consideration of our comments on the proposed changes to regulations under Title 3, Chapter 8, Alaska Administrative Code – 3 AAC 08.920(c) Amendment to Establish Fees for Certain ANCSA Corporations. ANVCA is a member organization composed of Alaska Native Village Corporations and governed by an elected Board of Directors.

We are aware of the current fiscal situation and understand that changes may need to happen. Our concern is exclusively limited to the fee proposal. The proposed changes regarding the establishment of an exorbitant fee structure is unacceptable. With that understanding, we request the following considerations in order of highest priority:

- 1) An extension on the time to receive comments from Alaska Native Corporations. The time considerations outlined in the Administrative Procedures Act may be acceptable when dealing with other governmental agencies, however we propose that the time has not been adequate to relay and receive information to all the Native Alaska Village Corporations. To date these changes affect less than 17% of all Village Corporations, however as Village Corporations increase shareholders and expand revenues these changes may have a great effect on many of them in the future.
- 2) We request that the Department of Commerce, Community and Economic Development have additional direct consultation with all Alaska Native Village Corporations, which we are willing to assist with.

- 3) If neither of the above recommendations are acceptable; we are asking for a reconsideration of filing fees and remedy that shifts the financial burden towards Corporations that produce higher workloads for your department; such as proxy filings and investigations.

Thank you in advance for consideration of our comments. We look forward to assisting you in providing a more palatable solution for all involved.

Respectfully,  
Keja Whiteman

Executive Director  
Alaska Native Village Corporation Association