



Electronic Submission

October 8, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A235
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of Inquiry – WC Docket No. 18-213, Promoting Telehealth for Low- Income Consumers

Dear Secretary Dortch:

Geisinger is an integrated health services organization widely recognized for its innovative use of the electronic health record and the development of innovative care delivery models such as ProvenHealth Navigator®, ProvenCare® and ProvenExperience®. As one of the nation's largest health service organizations, Geisinger serves more than 3 million residents throughout 45 counties in central, south-central and northeast Pennsylvania and also southern New Jersey at AtlantiCare.

In 2017, the Geisinger Commonwealth School of Medicine and Geisinger Jersey Shore Hospital became the newest members of the Geisinger Family. The physician-led system is comprised of approximately 30,000 employees, including nearly 1,600 employed physicians, 13 hospital campuses, two research centers, and a 583,000-member health plan. Geisinger has repeatedly garnered national accolades for integration, quality and service.

It is Geisinger's mission to enhance quality of life through an integrated health service organization based on a balanced program of patient care, education, research and community service. Although Geisinger has moved the needle for quality care and access to service, we see a growing need to remove other barriers to health care.

We believe telehealth services are imperative for optimum health and well-being for at-risk, low-income patients residing in rural areas. We also believe that technology is a great avenue to innovate and improve care. We are committed to providing patients' care, both on an inpatient and outpatient basis, with easy access to primary and specialty care within their local communities.

We appreciate the opportunity to provide comments to the FCC's Notice of Inquiry Promoting Telehealth for Low-Income Consumers.

We urge the FCC to keep a broad definition of rurality for the pilot by using the patient's area and/or home, rather than the provider clinic, to determine eligibility (current rurality standards from the Texas A&M website). We have seen many times where patients live over two hours from the closest clinic.

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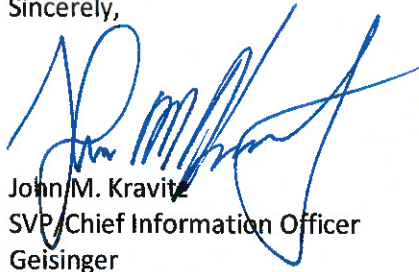
While Geisinger believes the pilot should be focused on majority rural areas, we feel it is important to also include urban sites where access to broadband is also a concern in some of the lowest-income communities. Additionally, because of the narrow broadband footprints in rural areas, Geisinger would suggest the FCC allow multiple service providers to partner with an applicant, versus one sole entity which cannot provide broadband to the entire service territory.

Geisinger also urges the FCC to allow for additional items beyond network equipment in the pilot budget to provide such services in the home and encourages the FCC to consider a requirement for matching funds committed to the applicant's proposal.

Geisinger recommends the FCC create an open-ended pilot program and application process which encourages specific areas of health focus and allows for all types of eligible clinicians to participate. We believe projects should go beyond the general scope of physicians and advanced practitioners to include specialty physicians.

Geisinger is very excited about the possibilities this Connected Care Pilot Program can provide. We thank you again for the opportunity to offer comments on how best to advance the use and access of telehealth services for patients who lack the resources and finances.

Sincerely,



John M. Kravitz
SVP/Chief Information Officer
Geisinger