



One Lumos Plaza
Waynesboro, VA 22980

February 1, 2018

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 17-310

Dear Ms. Dortch:

Lumos Networks, Inc. ("Lumos") supports the recently released Notice of Proposed Rulemaking and Order – WC Docket No. 17-310 – Promoting Telehealth in Rural America. We are pleased that the Commission is considering improvements intended to continue solving USAC RHC modernization issues. As a service provider to the RHCs, Lumos offers this recommendation to improve the following item:

- **More Transparent Service Provider Approved Information Form** – Lumos would respectfully urge the Commission to enhance the approved funding form/spreadsheet currently sent to Service Providers for the RHC Telecommunications Program and HCF Program by including the following additional information: *account number, BAN, service location, service type and bandwidth.*

In offering this recommendation, Lumos would note that healthcare organizations oftentimes have more than one service with the same or different bandwidths being provided at multiple service locations. The inclusion of the additional information being recommended by Lumos will lessen uncertainty attendant to instances in which a Service Provider or RHC consultant has to determine whether USAC funding for a particular service has in fact been approved.

Finally, Lumos believes this recommendation will not only promote transparency, but will also improve the accurate alignment of approved funding to services billed for each RHC. This in turn will allow each Service Provider to continue to do its part in preventing waste, fraud and abuse from occurring in the RHC Telecommunications Program.

Respectfully submitted,

A handwritten signature in black ink that reads "Mary McDermott". The signature is fluid and cursive, with the first name "Mary" and last name "McDermott" clearly distinguishable.

Mary McDermott
Senior Vice President, General Counsel, and Secretary
LUMOS NETWORKS
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