



February 2, 2018

The Honorable Ajit Pai, Chairman
The Honorable Mignon Clyburn, Commissioner
The Honorable Michael O'Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC DOCKET NO. 17-310, PROMOTING TELEHEALTH IN RURAL AMERICA

Dear Chairmain Pai and Commissioners:

Health IT Now (HITN) strongly supports the FCC plan to ensure federal regulations do not impede investment and innovation in the broadband market and device connectivity for health IT. HITN is a diverse coalition of health care providers, patient advocates, consumers, employers, and payers who support the adoption and use of health IT to improve health outcomes and lower costs.

A nationwide broadband network is foundational to a connected healthcare system.

Broadband is an essential tool for communication, sharing information, conducting business, and improving health. Doctors, patients, and the public in general are increasingly reliant on smartphones and tablets for healthcare information, remote monitoring, and in delivering care.

Telehealth is not only expanding access to care to patients located in rural areas, it is transforming how everyday Americans interact with the healthcare system. For example:

- If employers follow through with their plans, telehealth adoption in the employer market could reach 92 percent by 2018.¹
- Direct interactions with providers are being augmented by patients' use of mobile health apps to engage in their own health and wellness.
- Twenty-one percent of smartphone owners use health applications for exercise tracking, while sixty-two percent of smartphone owners use their phones to access health information.²

The convergence of medical advances, health information technology, and high-speed broadband networks is transforming the delivery of care by bringing the health care provider and patient together virtually, especially those in disadvantaged populations and geographies.

¹ *High-performance insights - best practices in health care* (Rep.). (2016). Willis Towers Watson.

² One in Five US Consumers Use Mobile Apps for Exercise Tracking. (n.d.). Retrieved June 08, 2017, from <http://www.ctia.org/resource-library/facts-and-infographics/archive/mobile-apps-for-exercise-tracking>

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With recent executive changes at USAC and new leadership at the FCC, it is time to rethink the USF goals and realign the programs administered by USAC. We must think beyond the classic views of the home, a library, a school, or a health center and focus on their broadband requirements as an access hub for services. As the Internet of Things (IoT) develops, we will not realize the potential until we eliminate all broadband dead zones. Emerging IoT technologies will require on-demand computing and communications services that can scale based on demand and provide authentication and authorization security at the device and transport layer.

Recommendations

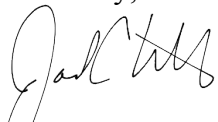
To realize the goal of everything everywhere connectivity, the FCC should consider the following recommendations:

1. Ensure regulations do not impede investment and innovation in the broadband market and device connectivity.
2. Establish an independent task force to review USAC reporting procedures and dramatically reduce unnecessary bureaucracy.
3. Target investments to create a minimum of at least one fixed and one wireless provider in a geographic area. Fixed and wireless are not fungible technologies. Both fixed and wireless networks are essential for high bandwidth in-home technologies and mobile IoT applications.
4. Develop a process to allocation supplemental funds from the USF to the USAC programs upon exceeding program goals and achieving measureable results with existing funding levels.
5. Prohibit recipients of grants, excluding High-Cost, from establishing proprietary networks and reselling capacity.
6. Realign the USF programs into an integrated approach to create an uninterrupted nationwide network of fixed, cellular, wifi, NFC, and emerging protocols, create high bandwidth access hubs for learning, research, health, and wellness, and provide reduced rate connectivity services for rural and disadvantaged populations at home and on the go.
7. Review all FCC initiatives to ensure they promote interoperability and security of systems, devices, and communications systems, provide for free, for a fee, and subscription services to communication and computing services, and convene industry and consumer groups to explore opportunities to evolve standards and innovation.

HITN strongly supports efforts by the FCC to drive efficient investment and innovation in the broadband market and device connectivity for health IT. The future depends on uninterrupted connectivity whether at home, at work, or on the go.

We appreciate the opportunity to share our feedback and comments on accelerating the adoption and accessibility of broadband-enabled healthcare solutions and advanced technologies. We look forward to continuing to work with the FCC to promote the use of technology in healthcare to improve health outcomes and lower costs.

Sincerely,



Joel C. White
Executive Director