February 2, 2018

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

Re: In the Matter of Promoting Telehealth in Rural America, WC Docket No 17-310

Dear Chairman Pai and FCC Commissioners:

Thank you for your support of the Rural Health Care Program (RHC) and for opening a rulemaking and order to review the RHC Program and ensure Americans have access to advanced telehealth services no matter where they live. We are writing in response to the Commission's request for comment on the appropriate budget increase and other reforms for the RHC Program.

By making telehealth and telemedicine services affordable, the FCC's RHC program improves healthcare in rural communities while helping lower overall health care costs. But, the current $400 million Rural Health Care Universal Service Support budget is inadequate to enable rural communities to realize these benefits. Instead, the budget remains stuck at the initial level set in 1997, despite two decades of inflation, advances in technology, and increased demand for services.

We believe that the FCC should increase the budget for the rural health care support mechanisms to reflect inflation over the past two decades and increases in the level of support available from those mechanisms, as well as increased technology and telecommunications demands due to our HIPAA legal obligations, advances in telemedicine capabilities, changes in patient expectations and standards of care, and new demands from skilled nursing facilities.

South Peninsula Hospital has had the pleasure of utilizing the Rural Health Care program for over a decade, in this time the RHC has allowed our small not for profit hospital to increase our connection to the greater world and allow services to our patients at speeds that greatly increase the ability for our providers to respond to life threatening circumstances, in the past the only option was for patients to be flown through medivac to Anchorage a city over 200 miles away where the patient would be evaluated and possibly passed on to settle for treatment,

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increased internet bandwidth has allowed for many changes in our workflow and patient diagnosis. As a smaller more rural hospital it can be difficult to maintain an on staff Specialists or Radiologists, there are many in Alaska that simply cannot staff a single physician.

A few examples for how SPH is able to provide lifesaving care

1.   The Tele-stroke remote presence device allows us to connect to a specialist that is more quickly able to diagnose and begin treatment in situations where minutes can count.

2.   eICU allows for treatment of critically injured patient treatment to begin at our facility sometimes hours earlier then would have been available without a high bandwidth connection.

3.   Athenahealth is an Internet based Health Information System this system depends on a good, reliable, and fast internet connection.

4.   Point Click Care is an Internet based Health Information System this system depends on a good, reliable, and fast internet connection.

5.   Kinsser Software is an Internet based Health Information System this system depends on a good, reliable, and fast internet connection.

6.   Phillips Heartstart utilizes information from paramedics in the field prior to them arriving at South Peninsula Hospital, allowing for time saving diagnoses and preparation of and for patients in crisis.

7.   Pharmacists are available remotely for weekend and afterhours support of our patient medication needs.

8.   When a Radiologist is unable to be present at SPH a remote radiologist is utilized for reading and diagnosing our X-ray, CT, MRI, Mammography, ultrasound and DEXA scans.

9.   Access to Internet based tools for drug interactions decreasing the chance of harmful medication interaction or side effects, having up to the minute access to the databases containing this information helps to eliminate negative effects for our patients.

10.   South Peninsula Hospital hosts clinics offered by Veterans Affairs, the VA uses a remote Health Information System, they also host remote mental health treatment for patients

11.	Petersburg Medical Center, also in rural Alaska uses a shared server hosted by South Peninsula Hospital, through a VPN connection, allowing them access to a resource they may not afford otherwise.

12.	Picture Archiving and Communication System (PACS) an electronic storage medium for Medial images such as X-rays, MRI, CT, DEXA and Ultrasound is utilized by many local clinics for access to electronic records. This also allows for cost savings from no longer needing to maintain costly film or the equipment for producing physical media.

The types of benefits and costs savings we have experienced are being replicated in many ways across rural areas in the State. It is also worth noting that Alaska is America's largest state, comprising roughly one-sixth the nation's total land area, yet has only about two tenths of one percent of America's population. 99.95% of the state is rural – a greater percentage than any other state in the nation. Several hundred of our communities are not reachable by road and are not connected to middle mile infrastructure. The distance to the nearest medical facility is often several hundred miles that can only be travelled by air. Especially because of our unique geography and rural nature, our rural clinics and hospitals urgently need assurance that additional RHC support will be available beginning in Funding Year 2018.

Growing evidence indicates that access to telehealth services also lowers health care costs in rural communities, saving money at the local, state and national levels. As one example, the Alaska Native Tribal Health Consortium estimates that access to telehealth services saves rural Alaskans $10 million annually in travel costs along. At the national level, the Veterans Health Administration (VHA) estimated that the annual cost in 2012 to deploy its telehealth program was $1,600 per patient per year, compared to over $13,000 for traditional home-based care and $77,000 for nursing home care. Telehealth was also associated with a 25 percent reduction in the number of bed days of care, and a 19 percent reduction in hospital admissions, across all VHA patients utilizing telehealth services.

Thank you for taking steps to ensure the long-term viability of the Rural Health Care Program to meet the increased demand for telemedicine services both in Alaska and across the country.

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CC:

The Honorable Senator Lisa Murkowski
The Honorable Senator Dan Sullivan
The Honorable Congressman Don Young