

February 2, 2018

Chairman Ajit Pai  
Commissioner Mignon Clyburn  
Commissioner Michael O'Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
Federal Communications Commission  
445 12<sup>th</sup> 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. I am writing on behalf of Cross Road Health Ministries, Inc. in response to the Commission's request for comment on the appropriate budget increase and other reforms for the RHC Program. Cross Road operates two widely separated FQHC clinics in rural Alaska and has been serving patients since 1956. Cross Road has participated in the RHC Program since 2004.

We know firsthand that the RHC program improves healthcare in the rural communities we serve while helping lower overall health care costs by making telehealth, telemedicine and communications services affordable.

For example, our patients have benefited directly from the RHC program by us moving from film-based to digital diagnostic radiology services enabled by secure private WAN connectivity between our clinics and our radiology vendor. This has allowed us to significantly improve access to care by accelerating diagnosis and treatment and avoiding unnecessary costly medivacs to advanced care facilities over 100 miles away while eliminating the costs, inefficiencies and environmental impact associated with film-based x-rays and equipment.

Our patients also benefit indirectly from the RHC program. Keeping information sharing and travel costs down allows us to put more of our budget into direct patient care. The same WAN connectivity enables Cross Road to securely, reliably and efficiently share access to our EMR and other information sharing services and systems such as our regional IP phone system. It also facilitates increased Internet bandwidth which has allowed us to more fully utilize collaborative cloud-based services for training, education and communications.

Of course the rural communities in the regions that Cross Road serves are only two of many that benefit from the RHC program. I understand the types of benefits and costs savings we have experienced are being replicated in many ways across rural areas both in State and outside of Alaska. However the current \$400 million Rural Health Care Universal Service Support budget—established in 1997—is now inadequate to enable rural communities such as

the ones Cross Road serves to fully realize these benefits. We believe that the FCC should increase the budget for the rural health care support mechanisms to address the effects of inflation over the past two decades and to avoid a recurrence of funding reductions that some RHC applicants experienced during the 2016 Funding Year. Our rural clinics and hospitals urgently need assurance that additional RHC support will be available for Funding Year 2017 and beyond.

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.

A handwritten signature in black ink, appearing to read 'Mitchell Cox', with a stylized flourish at the end.

Mitchell Cox  
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CC:

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