

March 28, 2019

BY ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: *Rural Health Care Support Mechanism*, WC Docket No. 02-60;
Promoting Telehealth in Rural America, WC Docket No. 17-310

Dear Ms. Dortch:

On Tuesday, March 26 and Wednesday, March 27, Leonard Steinberg, Ruth Willard (by teleconference) and Jim Gutcher of Alaska Communications, accompanied by outside counsel Richard Cameron, Bennett Ross and myself, met with the following individuals at the Commission: Randy Clarke (office of Commissioner Starks), Travis Litman (office of Commissioner Rosenworcel), Arielle Roth (office of Commissioner O’Rielly), Evan Schwarztrauber (office of Commissioner Carr); and Trent Harkrader (via teleconference), Ryan Palmer, Liz Drogula, and Johnnay Schrieber (all of the Wireline Competition Bureau).

In these meetings, Alaska Communications summarized its advocacy in the pending rulemaking proceeding for reform of the Rural Health Care Program.¹ The substance is set forth in the comments and other filings of Alaska Communications in WC Docket No. 17-310.²

Alaska Communications believes the Rural Health Care Program has provided well-established benefits that far outweigh the costs of the program. However, participants today are being subjected to unacceptable risks in the form of increasingly lengthy periods for processing

¹ See *Promoting Telehealth in Rural America*, Notice of Proposed Rulemaking and Order, WC Docket No. 17-310, 32 FCC Rcd 10631 (2017).

² Comments of Alaska Communications in WC Docket No. 17-310 (filed Feb. 2, 2018); Reply Comments of Alaska Communications in WC Docket No. 17-310 (filed March 5, 2018); Supplemental Comment of Alaska Communications in WC Docket No. 17-310 (filed Jan. 30, 2019); Supplemental Reply Comment of Alaska Communications in WC Docket No. 17-310 (filed Feb. 13, 2019); Letter from Karen Brinkmann, Counsel for Alaska Communications, to Marlene H. Dortch, FCC Secretary, in WC Docket Nos. 17-310 & 02-60 (filed March 13, 2019).

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requests for support, and the unpredictability of finally obtaining support in the amounts that were competitively bid. Healthcare providers and service providers alike need greater predictability, transparency and consistency in this program. Alaska Communications urges the Commission to finalize and release new rules prior to the end of June 2019 in order for them to take effect in Funding Year 2020.

Please direct any questions concerning this filing to me.

Very truly yours,

A handwritten signature in blue ink that reads "Karen Brinkmann".

Karen Brinkmann

Counsel for Alaska Communications

cc: Preston Wise
Travis Litman
Arielle Roth
Evan Schwarztrauber
Randy Clarke
Trent Harkrader
Ryan Palmer
Liz Drogula
Johnnay Schrieber