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April 2, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: Notice of *Ex Parte* in WC Docket Nos. 02-60, 17-310

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules¹ we hereby provide notice of an oral *ex parte* presentation in connection with the above-captioned proceedings. On Thursday, March 28, 2019, John Windhausen, Executive Director of the Schools, Health & Libraries Broadband (SHLB) Coalition and undersigned counsel (on behalf of the New England Telehealth Consortium, Connections Telehealth Consortium, and Catholic Health Initiatives (CHI), respectively) met with Preston Wise, Special Counsel to Chairman Pai. We discussed the SHLB Coalition's March 15, 2019 letter to Chairman Pai and Radha Sekar, CEO of USAC, concerning the continuing problems with administration and oversight of the Rural Health Care programs, affecting both the Telecommunications Program and Healthcare Connect Fund (HCF).²

We reviewed the issues raised in the March 15 SHLB letter including how consortia in the HCF are being severely impacted by the \$150 million HCF cap through delays in the issuance of funding commitments and new problems associated with multi-year funding requests being reduced to a single year. We noted, for example, that hundreds of contracts are being unnecessarily re-bid in both the HCF and Telecommunications Program before close of the 2019 filing window because of evergreen determinations for 2018 that have not yet been issued by USAC (these determinations are made as part of a funding decision).

¹ 47 C.F.R. § 1.1206.

² See <https://ecfsapi.fcc.gov/file/103152923226388/SHLB-RHC%20Ltr%20to%20FCC-USAC%20-%20March%202019%20-%20Final.pdf>.

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We also briefly discussed the difficulty applicants face understanding and responding to USAC funding denials when such denials lack a “clear and specific explanation” for the decision.³

We urged the Commission to complete the current rulemaking in the Rural Health Care program by June if possible with meaningful improvements to both the Telecommunications Program and the HCF. We noted that the NPRM sought comments on reforms to both programs and that SHLB’s comments have included suggested reforms to both the HCF and the Telecommunications Program.⁴

Please let us know if you have any questions.

Respectfully submitted,

/s/

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Catholic Health Initiatives

Cc John Windhausen,
Executive Director, SHLB

Gregory Jacobs, Polsinelli, PC
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³ Cf. *Rural Health Care Support Mechanism*, WC Docket No. 02-60, Report and Order, 27 FCC Rcd 16678, 16803, ¶ 300 (2012) (“USAC will inform applicants in writing of . . . a clear and specific explanation of how . . . participants can remedy . . . errors [in funding applications].”).

⁴ See, e.g., SHLB February 2018 comments at <https://ecfsapi.fcc.gov/file/102022402316613/SHLB%20Coalition%20Comments%20-%20RHC%20NPRM%20FINAL.pdf>; SHLB March 2018 reply comments at <https://ecfsapi.fcc.gov/file/1030694488905/SHLB%20Reply%20Comments%20-%20Final%20-%20March%20%205%2C%202018.pdf>.