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FCC Mailroom

*With Spirit and Strength*

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March 19, 2018

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554\

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Re: Rural Health Care Support Mechanism, WC Docket No. 02-60

Dear Ms. Dortch:

This letter is being sent on behalf of the Aleutian Pribilof Islands Association (APIA), a regional organization that carries out a wide range of services for member villages in the Aleutian chain and Pribilof Islands in Alaska. Among those services is quality health care in some of the most remote terrain in the United States.

APIA fully relies upon data and network connectivity to provide health care in its region. Without it, most every aspect of our work, other than the most basic elements, would involve costly and difficult travel.

When the USAC decision came down last year with a proration of about 7% reduction, APIA was immediately shocked. While the majority of that financial hit was averted through voluntary waiver of recovery of costs by GCI, APIA is still on the hook for paying Alascom for a portion of those costs.

Fast forward to last week, and APIA was absolutely devastated with the issuance of USAC guidance, and then FCLs that used an 84.4% funding proration for 2017. This comes late in the year with almost no option to do anything other than try to find a way to absorb a \$400,000 financial hit. APIA is not a for-profit enterprise; it has no option in its budget to pass costs on to clients. USAC, and by extension the FCC, has mandated that APIA reduce health care services to eligible patients.

We still have pending appeals from 2016 with USAC on the legality of the RHC funding cap itself. Does USAC, and/or the FCC intend to make a determination on that appeal? Does the

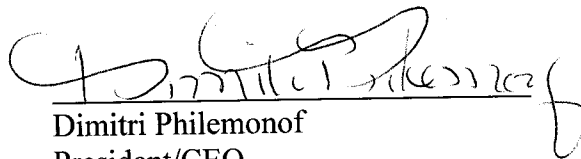
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FCC have some other immediate solution to mitigate against the \$18 million or so in lost funding to the Alaska Tribal Health System?

APIA was brought technologically into the 21<sup>st</sup> century through the RHC program. Is it the FCCs intent to dismantle a successful program with life-saving outcomes in our region?

I stand ready to travel to Washington to meet with the Commission at any time to work through solutions. Please contact me at (907) 276-2700 if you have any suggestions on our options going forward.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dimitri Philemonof", written over a horizontal line.

Dimitri Philemonof  
President/CEO

Aleutian Pribilof Islands Association

cc: Senator Lisa Murkowski  
Senator Daniel S. Sullivan  
Representative Don Young