



## Ninilchik Traditional Council

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April 13, 2018

Marlene H. Dortch,  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TW-A325  
Washington, D.C. 20554

**RE: Promoting Telehealth and Telemedicine in Rural America, WC Docket No. 17-310**

Dear Ms. Dortch,

I write in support of the Emergency Waiver Petition filed by the Schools, Health & Libraries Broadband (SHLB) Coalition on April 3, 2018. This Petition asks the FCC to waive Section 54.675(a) of its Rules and fully fund qualified applications for Rural Health Care (RHC) funding for Funding Year 2017 until the Commission completes the open rulemaking in WC Docket No. 17-310.

The RHC program funding cuts of 15 to 25 percent were much larger than anticipated and are effectively retroactive because they were not announced by USAC until more than eight months after the start of the funding year, much later than was reasonable or reasonably expected. As a result, health care providers across the nation that entered into contracts for eligible services effective at the start of FY 2017 (July 1, 2017) face immediate and significant financial hardship.

The Ninilchik Traditional Council Community Clinic, the primary care facility for the rural village of Ninilchik, will appreciate the opportunity to continue to utilize the telehealth services that dramatically improve access to care, accelerate diagnosis and treatment, enable video conferencing for remote consultation with patients, as well as ability to improve the VMware infrastructure between facilities. We recognize the increased need for affordable broadband telehealth services in rural Alaska, as it has certainly enhanced our capability to provide better healthcare service to our rural residents.

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission

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For many of us, loss or reduction of this funding equals hundreds of thousands of unbudgeted dollars, which in turn means a loss of telemedicine services and layoffs, negatively impacting healthcare in our communities.

Thank you for carefully considering our support of SHLB's emergency petition. While we hope long-term solutions to improve the Rural Health Care Program come from the open rulemaking docket, we must also urge the Commission to act to alleviate the more immediate problems being caused by the recent funding delays and shortages.

Sincerely,



Ivan Z. Encelewski  
NTC Executive Director

cc: The Honorable Senator Murkowski  
The Honorable Senator Sullivan  
The Honorable Congressman Young