



April 16, 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,

The Alaska State Hospital and Nursing Home Association (ASHNHA) supports 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.

ASHNHA represents Alaska's hospitals and skilled nursing facilities. Our membership spans geographically from PeaceHealth Ketchikan Medical Center to Samuel Simmonds Memorial Hospital in Utqiagvik. Our diverse association unites every small rural hospital and large hospital system in the state around common goals. For over 60 years, ASHNHA members have worked to improve health care in Alaska.

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 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 Alaska Native Tribal Health Consortium included tribal hospitals in their analysis of the significant impacts of the cuts. We want to ensure the Commission understands the impact for Alaska's rural non-tribal hospitals as well. For our rural non-tribal hospitals the cuts will result in over \$1.5 million in unanticipated expense.

Alaska's rural hospitals provide access to essential health care services in their communities. Rural hospitals are vital to local economies, providing family-wage jobs and services that attract other businesses and visitors. Rural hospitals are more than traditional hospitals. They provide a community hub for local health care services, telehealth, access to primary care and emergency services, and a bridge to specialized

care outside the community. Hospital financial challenges jeopardize both community health and the community's economy.

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,

A handwritten signature in black ink, appearing to read "Becky Hultberg".

Becky Hultberg
President/CEO

CC:

The Honorable Senator Murkowski
The Honorable Senator Sullivan
The Honorable Congressman Young