



**Bristol Bay Area
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*Bristol Bay Area
Health Corporation is
a tribal organization
representing 28 villages in
Southwest Alaska:*

Aleknagik
Chignik Bay
Chignik Lagoon
Chignik Lake
Clark's Point
Dillingham
Egegik
Ekuk
Ekwok
Goodnews Bay
Ivanof Bay
Kanakanak
King Salmon
Knugank
Koliganek
Levelock
Manokotak
Naknek
New Stuyahok
Perryville
Pilot Point
Platinum
Port Heiden
Portage Creek
South Naknek
Togiak
Twin Hills
Ugashik

*Our mission is to
provide quality
health care with
competence and
sensitivity.*

April 20, 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 on behalf of the Bristol Bay Area Health Corporation (BBAHC) 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 starting with Funding Year 2017, until the Commission completes the open rulemaking in WC Docket No. 17-310.

I also write in the support of the Waiver Request filed on April 2, 2018 by BBAHC, specifically representing the position of BBAHC as a severely impacted Alaska tribal health organization. That Waiver Request parallels one also later filed by the Council of Athabascan Tribal Governments (CATG).

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 the USAC until more than eight months after the start of the funding year, much later than was reasonable or reasonably expected. BBAHC is still waiting to receive Funding Commitment Letters (FCLs) from the USAC, furthering the delay in final decisions for 2017. As a result of these cuts, 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. In Alaska, where the telecommunications rates are astronomically higher than other parts of the country, the impacts will be far more severe.

BBAHC operates clinics in the extremely remote Bristol Bay region of Alaska, serving Alaska Natives and others in Bristol Bay as well as in isolated villages. For most of these villages, many of which are accessible only by air and sea, BBAHC's clinics provide the only health care services available. BBAHC relies heavily on telemedicine to provide services to these villages. The extreme remoteness of these clinics results in punishingly high costs of infrastructure for internet connectivity required for telemedicine, electronic health records and other

mission critical services and BBAHC depends on the reimbursement provisions of the Universal Service Fund Rural Health Care program to pay for these costs.

Losses in RHC funding will severely impact patient care, making some telehealth and telemedicine applications potentially unusable and facilities incapable of handling the data traffic that is required to handle health applications and data. Without these patient care modalities, BBAHC expects patient travel costs to potentially skyrocket. Full funding of the RHC program is necessary for BBAHC to continue to put its substantial investment in telemedicine, telehealth, and EHRs to full usage going forward.

Thank you for carefully considering our support of SHLB's emergency petition and BBAHC's own pending Waiver Request. While we hope that the open rulemaking docket will yield long-term solutions to improve the Rural Health Care Program, 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 dark ink, appearing to read "Robert Clark", is written over a horizontal line.

Robert Clark, President/CEO
Bristol Bay Area Health Corporation

cc: The Honorable Senator Murkowski
The Honorable Senator Sullivan
The Honorable Congressman Young
Geoffrey Strommer, HSDW