April 30, 2018

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: *Promoting Telehealth in Rural America*, WC Docket No. 17-310

Dear Ms. Dortch:

On April 27, 2018, Stephen J. Rosen and the undersigned, counsel for the University of Texas Health Science Center (“UTHSC”), met with Dana Bradford, Soumitra Das, Elizabeth Drogula, and Preston Wise of the Wireline Competition Bureau.

We discussed UTHSC’s applications for funding under the Commission’s Telecommunications Program to support rural health care providers in their acquisition of telecommunications services. In particular, we discussed the challenges of complying with Sec. 54.607 of the Commission’s rules for services in geographic areas where (1) an applicant’s service provider has no similarly situated customers of comparable services, (2) no publicly-available rates are available for similar services from other providers, and (3) no state or federal regulatory mechanisms exist for filing and obtaining approval of rate schedules or for recording and allocating a carrier’s costs of service. We also discussed the Commission’s pending proceeding in the docket referenced above in which the Commission is seeking comment on these issues and may consider filings related to the showing described in Sec. 54.607(b)(1) and (2) of the existing rules.

Sincerely,



cc: Dana Bradford

Soumitra Das

Elizabeth Drogula

Preston Wise