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The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12 St. SW
Washington, DC 20554

Radha Sekar
CEO
Universal Service Administrative Company
700 12th Street, NW, Suite 900
Washington, DC 20005

Notice of ex parte filing: WC Docket No. 17-310, CC Docket No. 02-60

Dear Chairman Pai and Ms. Sekar,

As an FCC Pilot and Rural Healthcare Connect Fund (HCF) participant since 2007, Geisinger Health System writes to express our concern regarding the delay in the Healthcare Connect Fund funding commitment decisions.

To date, the Geisinger Consortium received Funding Commitment Letters for only eight out of our 88 sites when many of our applications were submitted in Spring of 2018.

While we understand the effort to combat waste, fraud and abuse in the RHC program through enhanced reviews and audits, there has been significant impact caused from funding delays for our rural under-served communities. Community hospitals who have signed binding contracts with service providers are unsure whether they will receive funding for broadband circuits and are burdened with paying 100% of the service provider invoices outside of their budgeted expenses.

Approximately 78% of the population in Geisinger's service area reside in rural-designated counties and greater than 60% of the population has one or more chronic health conditions. In addition, 18% of Geisinger's service area population is aged 65 years or older and represents a growing age cohort in every county. These geographic, condition, and age factors create barriers to care, inhibiting early intervention and negatively impacting longitudinal disease

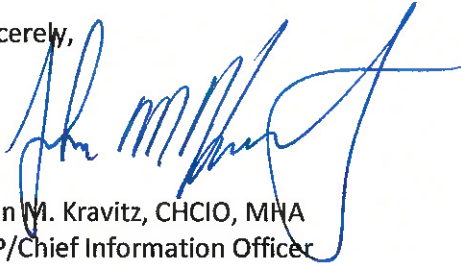
management. In addition, the population of those aged 65 or older will more than double from 50 million to 89 million by 2050.

The Geisinger HCF Consortium was designed to support the community hospitals that function as anchor institutions in their communities as important economic engines. Through FCC funding, the Consortium benefits patient and providers in rural and medically under-served populations, allowing patients to stay close to home while retaining revenue at community hospitals and keeping employment in local communities. Geisinger's Telemedicine Consult Program is designed to enable patients living in rural areas or receiving care at rural community health facilities, to have timely access to Geisinger specialists. By delaying funding commitments, it restricts community hospitals to be able to purchase the much-needed telemedicine equipment without jeopardizing their already lean budget.

While we appreciate the efforts that have been made to improve the HCF program, we are concerned about the FCC's delay in funding commitments. Our fear is that the hardship of the funding delay causes continued financial pressures and some members of our network are simply not able to afford to pay 100% funding and therefore unable to reach our vulnerable population.

We ask that every effort is made to expediate the review and awarding of all pending applications by May 30, 2019.

Sincerely,



John M. Kravitz, CHCIO, MHA
SVP/Chief Information Officer
Geisinger Health System