

May 8, 2018

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

**Re: Rural Health Care Program: Request to Promptly Approve Emergency Petition for Waiver of the Funding Cap Pending Conclusion of the Open Rulemaking**

Dear Ms. Dortch,

The El Rio Health Center is writing to strongly urge the Commission to approve the Emergency Petition for Waiver of the Rural Health Care Program (RHCP) Funding Cap Pending Conclusion of the Open Rulemaking, which was recently filed by the Schools, Health & Libraries Broadband (SHLB) Coalition.

*El Rio is dedicated to providing health care for all people. Since El Rio began in 1970, we have grown from 10,000 patients to over 101,000 people served. We are proud to be one of the most innovative, highly regarded, non-profit health center in the United States. We focus on positive outcomes, treating the whole person. Our health care is delivered by compassionate, professionally trained, integrated health teams who give from their hearts to provide world-class care.*

*In today's world, we can no longer work without broadband. Per mandate, all medical records are digital. Without broadband, we cannot access cloud-based records and we cannot send claims. Without broadband we are unable to share and search for medical data from hospitals, other clinical sites, and the Arizona Health Information Exchange. Without broadband, we lose the secure messaging and secure sending of prescriptions to pharmacies. In short, limiting broadband limits efficient cost-effecting healthcare.*

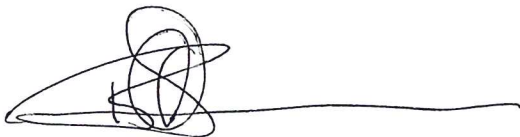
El Rio Health Center strongly urges the FCC to promptly approve the Emergency Petition for Waiver of the RHCP Funding Cap Pending Conclusion of the Open Rulemaking, for the following reasons:

- The reductions in FY2017 RHCP payments to rural FQHCs are in direct contradiction to Congress' and HHS' long-standing efforts to expand EHRs and telehealth in rural communities.

- The reductions in FY2017 RHCP payments to rural FQHCs are significant, unexpected and largely-retroactive – and particularly difficult for small safety-net providers to absorb.
- Given the size of the FY2017 reductions – and the unpredictability of future payment amounts – many rural FQHCs are considering giving up activities that require broadband access, despite significant pressure from Congress and HHS to engage in these activities.
- Both the \$400 million cap and FCC oversight of the RHCP are outdated, and rural safety-net providers should not be penalized while waiting for the FCC to complete its updates of both.
- Given that rural providers and carriers are presently determining if -- and under what terms -- they will participate in the RHCP in FY18, the FCC should approve the emergency waiver promptly.

Thank you for your attention to this request and for your efforts to increase access to care for medically underserved patients in rural areas. Please feel free to contact me directly if you would like additional information.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

**Robert Thompson, CIO**  
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