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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 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 for Funding Year 201 until the Commission completes the open rulemaking in WC Docket No. 17-310.

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 reasonable or 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.

Telemedicine is a cost-effective technology development that has allowed us to dramatically improve access to and quality of care, accelerate diagnosis and treatment, avoid unnecessary costs such as medivacs, and expand local treatment options.

At our clinic, we have been able to provide the rural community of Yakutat, Alaska with the access to 7 master level clinicians and one onsite chemical dependency counselor to help support improved behavioral health with the RHC support. We are also providing the Rural Veterans Health Access Program (RVHAP) state wide with the clinical support via tele-behavioral system.

For example, advances in technology such as tele-behavioral health for our agency have led to increased demand for broadband and has increased over the past three years and looks like it will increase again in the coming years. The extra broadband has helped us to open up our services state wide to help support veterans with the RVHAP.

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.

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Sincerely,

Amy Zanuzoski
Executive Director

CC:

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