

Appeal for Waiver of Program Rules on Proration

15 May 2018

Contact Information:

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Per <https://www.usac.org/rhc/about/program-integrity/default.aspx>:

Safeguarding the integrity of universal service program activities involves important responsibilities for both USAC and program participants. USAC must take in, process, and evaluate information received from program participants and universal service fund contributors in an accurate, timely fashion. Beneficiaries must provide USAC with full, correct information and comply with program rules.

Funding Commitment Decision Letters need to fund requests in whole.

It is not fair, or in the best interest of the communities involved to ask the Health Care Provider ("HCP") or Service Provider to pay the prorated difference.

The following applicants request that their Funding Commitment Decision Letters be revised to allow for 100% funding, without proration:

Funding Commitment Letter Date: 3/16/2018

Invoicing Deadline: 12/31/2018

Funding Year: 2017

Health Care Provider (HCP) Name: Frontier Community Services

HCP Number: 49329

HCP Contact Name: Amanda Faulkner

HCP Contact Email: afaulkner@fcsonline.org

HCP Contact Phone: (907) 714-6644

Funding Request Number: 17252301

Funding Commitment Letter Date: 3/16/2018

Invoicing Deadline: 9/16/2018

Funding Year: 2017

Health Care Provider (HCP) Name: Central Peninsula Hospital

HCP Number: 11902

HCP Contact Name: Bob Wattam

HCP Contact Email: bwattam@cpgh.org

HCP Contact Phone: (907) 714-4715

Funding Request Number: 17269261

Funding Commitment Letter Date: 3/16/2018

Invoicing Deadline: 12/31/2018

Funding Year: 2017

Health Care Provider (HCP) Name: Cordova Community Medical Center

HCP Number: 10781

HCP Contact Name: Scot Mitchell

HCP Contact Email: smitchell@cdvcmc.com

HCP Contact Phone: (907) 424-8000

Funding Request Number: 17266881

Funding Commitment Letter Date: 3/16/2018

Invoicing Deadline: 12/31/2018

Funding Year: 2017

Health Care Provider (HCP) Name: Camai Community Health Center

HCP Number: 14459

HCP Contact Name: Patricia DeSoto

HCP Contact Email: pattycchc@gmail.com

HCP Contact Phone: (907) 246-6155 ext. 316

Funding Request Number: 17267461

Funding Request Number: 17267391

Funding Commitment Letter Date: 3/16/2018

Invoicing Deadline: 12/31/2018

Funding Year: 2017

Health Care Provider (HCP) Name: IHS/ABQ Alamo Hlth Ctr

HCP Number: 11580

HCP Contact Name: David Jones

HCP Contact Email: djones@ansbi.org

HCP Contact Phone: (575) 854-2543 ext. 1405

FCC Form 461 Application Number: 100022022

Funding Request Number: 17269711

Funding Request Number: 17271171

Funding Commitment Letter Date: 3/16/2018

Invoicing Deadline: 12/31/2018

Funding Year: 2017

Health Care Provider (HCP) Name: Kenaitze Indian Tribe – Dena’ina Wellness Center

HCP Number: 12595

HCP Contact Name: Darby Gruber

HCP Contact Email: dgruber@kenaitze.org

HCP Contact Phone: (907) 335-7206

Funding Request Number: 17280661

Precise relief sought:

We ask that program rules be waived and required actions be taken to fund the prorated amount. A remedy for the prorated shortfall in funding should be identified and implemented. In making these determinations, the Commission should consider evidence of hardship, equity, and effective implementation.

The underlying concept of Universal Service implies all Americans have availability to and affordable access of telecommunications. The share of a rural HCP’s cost of telecommunications should be in line with urban HCPs. Rural HCPs should not have to pay more for the same service.

Granting this waiver is in the best interest of the applicant and the communities they serve.

Thank you for your Consideration,

A handwritten signature in black ink, appearing to read "Dan Kettwich". The signature is fluid and cursive, with the first name "Dan" and last name "Kettwich" clearly distinguishable.

Dan Kettwich on behalf Frontier Community Services, Central Peninsula Hospital, Cordova Community Medical Center, Camai Community Health Center, IHS/ABQ Alamo Hlth Ctr and Kenaitze Indian Tribe

Attached: Rural Health Care HCF Funding Commitments