

June 20, 2019

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Promoting Telehealth in Rural America, WC Docket No. 17-310  
Notice of *Ex Parte* Communication

Dear Ms. Dortch:

On Tuesday, June 18, 2019, Anand Vadapalli, Leonard Steinberg and Bill Bishop of Alaska Communications, Richard Cameron of Cameron Law & Policy LLC, and I met with Chairman Pai and Preston Wise regarding the above-captioned rulemaking. The discussion focused on the progress being made by the Commission toward resolving the many critical issues in the rural health care rulemaking and related problems arising under the current, outdated rules.

Alaska Communications summarized the reform proposals it has filed in this docket, including detailed proposals to: establish an administratively manageable set of guidelines for approval of the rural rate and urban rate under the Telecom Program; eliminate the uncertainty of cost-based analysis of rural rates in a competitively bid environment; enlarge the budget for the program to ensure it is sufficient to meet the current and anticipated needs of rural health care providers; and codify in the Commission's rules enforceable procedures governing USAC's processing of funding requests to provide greater clarity, transparency and speed of processing.<sup>1</sup>

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<sup>1</sup> Letter from Karen Brinkmann, Counsel to Alaska Communications, to Marlene H. Dortch, FCC Secretary, in WC Docket No. 17-310 (filed May 7, 2017); Comments of Alaska Communications in WC Docket No. 17-310 (filed Feb. 2, 2018); Reply Comments of Alaska Communications in WC Docket No. 17-310 (filed March 5, 2018); Supplemental Comment of Alaska Communications in WC Docket No. 17-310 (filed Jan. 30, 2019); Supplemental Reply Comment of Alaska Communications in WC Docket No. 17-310 (filed Feb. 13, 2019); Letter from Karen Brinkmann, Counsel to Alaska Communications, to Marlene H. Dortch, FCC Secretary, in WC Docket Nos. 02-60, 17-310 (filed March 13, 2019); Letter from Karen Brinkmann, Counsel to Alaska Communications, to Marlene H. Dortch, FCC Secretary, in WC Docket No. 17-310 (filed May 20, 2019); Letter from Karen Brinkmann, Counsel to Alaska Communications, to Marlene H. Dortch, FCC Secretary, in WC Docket No. 17-310 (filed May 28, 2017).

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Alaska Communications urges the Commission to expeditiously conclude its rulemaking so that new rules may become effective in time for implementation prior to Funding Year 2020.

Please direct any questions concerning this matter to me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Karen Brinkmann".

Karen Brinkmann

*Counsel to Alaska Communications*