



July 2, 2019

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Dear Commissioners Pai, O’Rielly, Rosenworcel, Starks, and Carr:

The Western New York Rural Area Health Education Center would like to submit commentary in support of the FCC Connect Care Pilot program. We agree with the FCC that “...lack of affordable and robust broadband Internet access service is an obstacle to the adoption of connected care services...” and that “...universal service support could help address that obstacle.”

The extension of FCC support from the RHC programs to telehealth is well-timed. The recent Mid-Atlantic Telehealth Resource Center conference declared that “we are at a tipping point” due to technological and policy advances in the telehealth and telemedicine arenas. Advanced monitoring capabilities, artificial intelligence and other predictive analytics, wearables, etc. are evolving at an exponential rate and traditional medicine delivery is increasingly adopting these tools.

Specific to your request for feedback, we agree that the definition of eligible health care providers should be consistent with section 254(h)(7)(B). These facilities are familiar with existing FCC program policies and procedures and many have already submitted FCC Form 460. We also agree that eligible providers in the pilot program have prior telehealth experience and long-term patient care.

We think there is some merit to limiting participation to HRSA’s Health Professional Shortage Areas or Medically Underserved Areas designation. These areas are the neediest and will be primary beneficiaries of telemedicine. According to the CDC, “...[r]esidents of rural areas in the United States tend to be older and sicker than their urban counterparts. They have higher rates of cigarette smoking, high blood pressure, and obesity...They also have higher rates of poverty, less access to healthcare, and are less likely to have health insurance. Rural areas have a larger aging population that often makes access to healthcare difficult and is correlated with chronic disease.” <https://www.cdc.gov/media/releases/2017/p0112-rural-death-risk.html>.

The Connect Care program is a welcome addition to the existing Healthcare Connect Fund and the Telecommunications Program. Thank you for your efforts in improving “health care providers’ access to communication technologies” which should improve the entire health delivery system.

Respectfully,

20 Duncan St, PO Box 152, Warsaw, NY 14569

This Organization is an Equal Opportunity Provider and Employer.

PARTNER, NEW YORK STATE AHEC SYSTEM

A handwritten signature in black ink, appearing to read 'Nathan Coogan', with a long horizontal flourish extending to the right.

Nathan Coogan, Program Coordinator  
Western New York Rural Area Health Education Center  
20 Duncan St  
PO Box 152  
Warsaw, NY 14569  
585-786-6275  
[ncoogan@r-ahec.org](mailto:ncoogan@r-ahec.org)