

July 22, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: Notice of Ex Parte in WC Docket No. 17-310 Rural Health Care Program

Dear Secretary Dortch:

Colorado Hospital Association (CHA), on behalf of its over 100 hospital and health system members appreciate the investment of time and effort involved in preparing the Rural Health Care proposed Report and Order. In light of challenges that we have identified in the Order, CHA is urging the Federal Communications Commission (FCC) to consider delaying the decision on the proposed Rural Health Care Program Order and remove the proposed Report and Order from the August 1, 2019 agenda for the open Commission meeting so that stakeholders can work with the Commission to resolve the concerns and question related to the draft document.

Currently, the Order attempts to clarify the proposed definitions of rural areas, but there are significant challenges with the additional rural categories. For example, the draft Order groups areas into tiers that are supposed to be comparable. However, the areas within those tiers in some cases are not comparable, and there is no avenue to address that flaw. Some extremely remote areas, for instance, that are not accessible by roads may have much higher costs than other extremely rural areas. There is an opportunity for the Commission to gather data and analyze the overall impact of these rural definitions of the program. We urge the Commission to conduct this analysis before it adopts these new rules and approves the Order.

Additionally, there are several small towns that would be considered urban under the proposed rural groupings. If the Commission is determined to use census designations, we suggest that it:

- Recognize the use of “micropolitan areas” and “metropolitan areas” as defined by the census bureau in 2003 <https://www.census.gov/topics/housing/housing-patterns/about/core-based-statistical-areas.html>; and
- Use census blocks rather than census tracts as the unit of measure to accommodate for the comparatively large area of rural census blocks which can be as much as 1,500 times the area of an urban census block.

As an affiliate of CHA, CTN is a federally designated provider for Colorado’s health care broadband infrastructure. It works in partnership with various health information technology entities in the state. CTN has been extremely successful in using FCC funds to impact health outcomes in rural and underserved Colorado communities by assisting providers with access to adequate broadband services. When adequate broadband is secured within a community, it directly impacts the health and health care of the community and the social determinants of health.

Expanded subsidy programs have enabled community health centers, local health departments, community mental health centers, rural health clinics, rural hospitals and safety net clinics to enhance broadband connectivity and has allowed participants to save up to 65 percent on broadband services through the FCC subsidies. Overall, CTN has reduced broadband costs in Colorado by more than \$21 million and has resulted in savings for rural hospitals, clinics and behavioral health centers since 2014.

The purpose of this letter is to request delaying the decision on the proposed Rural Health Care Program Order to allow further consideration of these comments. If we can provide additional information or if you have any questions, please do not hesitate to contact Kathy Osborn, director, Colorado Telehealth Network (CTN) at kathy.osborn@cha.com or 720.330.6065.

Thank you for your efforts to support access to care in rural communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven J. Summer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven J. Summer
President and Chief Executive Officer

cc: Senator Michael Bennet
Senator Cory Gardner
Representative Diana DeGette
Representative Scott Tipton
Representative Ken Buck
Representative Doug Lamborn
Representative Joe Neguse
Representative Ed Perlmutter
Representative Jason Crow