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July 22, 2019

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, Draft Report & Order

Dear Ms. Dortch,

Thank you for the opportunity to comment on the Draft Report and Order for WC Docket No. 17-310, Promoting Telehealth in Rural America. We also appreciate the Commission's work to improve the Rural Health Care (RHC) program and want to help ensure there are no harmful unintended consequences from the proposed changes. We hope you will consider our comments before voting on the Order.

Under the system described in the draft Report and Order, most locations served by Alaska's rural healthcare providers would be grouped in the "extremely rural" tier with a single median rate for all. While the concept seems sound in theory, in practice it could cut off the highest cost Alaska locations participating in the RHC program. We agree with Alaska Communications' comments filed July 19, 2019 that Alaska's "extremely rural" areas are not alike in geography, cost or service availability.

You often hear that Alaska is different. The truth is, it really is. You can fit New York, Washington, D.C., Pennsylvania, New Hampshire, Maine, Vermont, Massachusetts, Virginia, North Carolina, South Carolina, Kansas, Connecticut and Texas in the same area as Alaska. Yet, Alaska's population of just 737,438 (2018) is less than that of the state capital of Texas.

We have rural communities accessible only by small, Bush planes, and that can only get telecommunications service via satellite. We also have rural communities on the road system, close to major fiber-optic networks. Naturally, the price for telecommunications service varies greatly between an on-road and off-road community, especially when it takes more than one provider to get service to a rural area.

We support Alaska Communications' proposal to sub-divide Alaska's "extremely rural" tier into three sub-tiers: locations on the road system with access to terrestrial broadband, locations off the road system with access to terrestrial broadband, and locations exclusively served by satellite. You could then use the median rate for each of these sub-tiers.

We also agree with Alaska Communications' comments that advanced telecommunications services, such as MPLS, should be eligible for RHC support under the telecom program. We respectfully urge the Commission to modify this aspect of the draft Report and Order to clarify that non-telecommunications telehealth transmission services are eligible for telecom program support. As you know, telehealth services have advanced significantly and rely on advanced information services. MPLS is the best available high-speed broadband service that meets our needs for a managed service that is reliable, flexible and secure.

Again, we thank the Commission for the opportunity to add our voice to ensure America's most rural communities continue to benefit from the delivery of telehealth services.

Sincerely,

Amy Zanuzoski
Executive Director