



Submitted via: <https://www.fcc.gov/ecfs/filings>

July 22, 2019

Chairman Ajit Pai  
Commissioner Mike O’Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
Commissioner Geoffrey Starks  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Comment on WC Docket No. 17-310**

Dear Chairman and Commissioners:

The Alaska Native Tribal Health Consortium appreciates the Federal Communications Commission’s goal of improving the policies and operation of the Rural Healthcare (RHC) program. However, we respectfully ask you to remove the proposed Report and Order from the August 1, 2019 agenda for the open Commission meeting, and extend the comment period, so we can better assess information included in the proposed Report and Order and that issues raised in the draft document can be clarified.

The scope of the proposed reform is deliberately broad and requires thoughtful review by those that are most impacted and dependent on subsidies for connectivity. Alaska tribal organizations represent the largest block of providers in the Telecom Program (accounting for 67% to 80% of gross demand) and are at the highest risk of any group to suffer adverse impacts. We do not believe we can provide the FCC with the sufficient feedback in time to meet the July 23<sup>rd</sup> deadline for comments.

We also need time to understand the budget implications of the proposed reform. The coming fiscal year looks to be one of the hardest years on record for tribal health in Alaska. State budget cuts, Medicaid cuts, and aging populations are but a few examples of where revenue is shrinking as demand for care increases. Yet connectivity remains mission critical within the Alaska Tribal Health System, and need for connectivity will continue to grow as we face

**Alaska Native Tribal Health Consortium**  
4000 Ambassador Drive, Anchorage, Alaska 99508  
Main: (907) 729-1900 | Fax: (907) 729-1901 | [anthc.org](http://anthc.org)

budgets cuts and need to “do more with less”. Frankly, we cannot provide care without the expanding need for connectivity to Electronic Health Records and for telehealth.

We have learned from previous years that even well intended changes to subsidy formulas (e.g. pro-rated subsidies) have enormous multiplier effects on connectivity costs in Alaska. In those cases, the FCC was open to feedback from Alaska tribes and sought for a solution that was equitable and well reasoned. This demonstrated both the need to share information and to work towards a fair solution that support health care in rural areas. We are asking that we take the same approach here, where the FCC provides time for Alaska tribes to digest and understand the proposal and share valuable feedback with the FCC.

We believe that the proposed Report and Order released on July 11, 2019 leaves many issues and raises new questions. The intent to review this order at the August 1, 2019 meeting prevents our organization from conducting a meaningful review of the order and its potential impact to the way our organization delivers telehealth services to Alaskans.

Respectfully,

A handwritten signature in black ink, appearing to read "Lisa Murkowski", written in a cursive style.

Cc: Senator Lisa Murkowski  
Senator Dan Sullivan  
Congressman Don Young