



Akiak
Akiachak
Alakanuk
Andreafsky
Aniak
Anvik
Atmautluak
Bethel
Bill Moore's Slough
Cheforak
Chevak
Chuathbaluk
Chuloonawick
Crooked Creek
Eek
Emmonak
Georgetown
Grayling
Hamilton
Holy Cross
Hooper Bay
Kasigluk
Kipnuk
Kongiganak
Kotlik
Kwethluk
Kwigillingok
Lime Village
Lower Kalskag
Marshall
Mekoryuk
Mountain Village
Napaimute
Napakiak
Napaskiak
Newtok
Nightmute
Nunam Iqua
Nunapitchuk
Ohogomiut
Oscarville
Paimute
Pilot Station
Pitka's Point
Quinhagak
Red Devil
Russian Mission
Scammon Bay
Shageluk
Sleetmute
St. Mary's
Stony River
Toksook Bay
Tuluksak
Tuntutuliak
Tununak
Umkumiut
Upper Kalskag

July 25, 2019

Chairman Ajit Pai
Commissioner Mike O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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

**Re: Promoting Telehealth and Telemedicine in Rural America, WC
Docket No. 17-310 Draft Report & Order**

Dear Chairman and Commissioners:

The Yukon-Kuskokwim Health Corporation ("YKHC") thanks 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.

YKHC provides health care services to approximately 30,000 people living in more than 50 rural and remote communities in southwest Alaska, across a region the size of Oregon. No roads connect the villages in our region. Communities can only be reached by airplane, boat, or snow machine. Indeed, more than a dozen of the communities YKHC serves are more than an hour away by air (greater than 100 miles) from the YKHC Regional Hospital in Bethel – when weather permits air travel at all. YKHC's ability to more effectively serve patients in the most remote and sparsely populated area of southwest Alaska relies on the use of telemedicine, which in turn depends on telecommunications connectivity.

The proposed changes could have a significant impact on the availability and level of telecommunication services in our region and by extension, impact our ability to provide essential health care services to our communities. We hope you will consider our comments before voting on the Order.

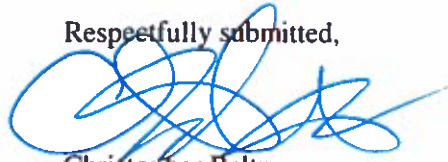
- We recommend that the FCC conduct further in-state analysis within Alaska prior to consideration of the Report and Order. There are the wide variations of "rural" areas in Alaska. Even a category such as "extremely rural" will require additional gradations of remoteness to be accurate. For example, there are substantial differences between areas of the state that are served by roads vs. those that are not. Those differences play out in substantial variations in infrastructure, health, and telecommunications costs.
- Absent additional site-specific analysis within Alaska, there is concern that the utilization of a "median" rural rate, as discussed in the Report and Order, could result in

price-setting that could have the unintended consequence of reducing, rather than increasing, competition among carriers in Alaska. A "median" rate that is used for determination of RHC funding could create situations where some Alaska communities, which are not in fact "median" cannot attract carriers for RHC services.

- While the Report and Order does indicate that prioritization based on degree of rurality could mean that Alaska, as a largely "extremely rural" area can better compete for funding, the concern is that the higher priority could come in combination with a median-defined funding "cap" that could cut off the highest cost Alaska locations participating in the RHC program. These are the same locations, like YKHC, the FCC notes that are pioneering the use of telehealth and EHR applications. Alaska's "extremely rural" areas are not alike in geography, cost or service availability, and a significant change in funding could create a serious disruption in health delivery in our region.

Again, we thank the Commission for the opportunity comment on the proposed changes an effort to help the communities YKHC serves to continue to benefit from the delivery of telehealth services.

Respectfully submitted,



Christopher Beltzer
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Yukon-Kuskokwim Health Corporation