



Alaska Primary Care  
ASSOCIATION

July 24, 2019

**BY ELECTRONIC FILING VIA EEFs**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 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 Docket 17-310 due to be considered by the FCC next week. The Alaska Primary Care Association (APCA) supports the development and operations of Alaska's 27 Federally Qualified Health Centers (FQHC). They operate over 160 sites across Alaska, the vast majority of which rely on the USAC Telecom program.

The support provided by USAC RHC is number two in revenue drivers supporting the rural community health safety net in Alaska, (number one is Medicaid reimbursements for service and number three is HRSA 330 operational grants). The importance of reliable, adequate, and affordable connectivity increases every year as community health centers increasingly use their electronic health records and telehealth services to address requirements to document improvements to clinical quality, patient experience, and cost containment. A stable and responsive RHC program is vital to anticipate and respond to service needs improvements and increases that occur every year.

APCA and Alaska Health Centers appreciate the FCC's and USAC's attention to address the program's funding adequacy, transparency, as well as regulatory and application challenges. At this time, APCA is interested in the following components of the program going forward:

**1. Support for subtiers within the "Extremely Rural" median rate**

We are concerned that the proposal to group most Alaskan rural health providers under a single "extremely rural" tier with a single median rate does not consider the range of communities and the greatly varying prices to provide service between those on a road system with access to wire service and those much more isolated that require microwave or satellite connectivity.

A single median rate could hinder service provision to the most difficult to reach communities. We are supportive of the idea of subdividing the extremely rural tier into subtiers that address access to terrestrial broadband versus satellite.

**2. Support inclusion of analysis of whether a transition period is necessary related to any change in RHC operation or funding**

The Report and Order seem to indicate that the intent is for the FCC to essentially create change in what the level of funding will be from the RHC program to the State of Alaska, as Alaska is mentioned multiple times in the draft in relation to the amounts of funding it receives. If the FCC foresees substantial change occurring at

the community level, statewide level, or anywhere on the continuum in between, the Report and Order should build into its analysis any transition period necessary for such change.

**3. Support for eligibility of advanced telecommunications services for RHC support under the telecom program.**

We 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. Telehealth services continue to advance significantly and rely on advanced information services. MPLS is the best available high-speed broadband service that meets rural providers' needs for a managed service that is reliable, flexible and secure.

We thank the FCC for this opportunity to comment and for its ongoing support of the RHC program.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Merriman", is centered on a light blue rectangular background.

Nancy Merriman  
Executive Director