

July 25, 2019

**BY ELECTRONIC FILING**

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 (FCC-CIRC1908-03)

Dear Ms. Dortch:

Alaska Communications respectfully requests that this letter be made part of the record in the above-captioned proceeding. Further to Alaska Communications' previous advocacy concerning the draft Report and Order, Alaska Communications hereby provides additional information about off-road communities.

According to the state of Alaska, 82 percent of the communities in the state are not accessible by road.<sup>1</sup> This makes Alaska unique in the nation, including for purposes of delivering telehealth services. For this reason, and as explained in its prior filings in this docket, Alaska Communications urges the Commission to create a fourth rural tier for rural rates under the telecom program, in addition to less rural, rural and extremely rural,<sup>2</sup> for the most rural parts of Alaska that are not accessible by road. This fourth tier would be carved out of the areas designated in the draft Report and Order as extremely rural parts of Alaska.

Alaska Communications understands that any division of the extremely rural tier into "on-road" and "off-road" sub-tiers must be based on an objective source that easily can be accessed by the Commission, USAC and the public, that cannot be manipulated by service providers or healthcare providers, and that can be identified in advance of developing prices for services. The purpose of this letter is to refer the Commission to such a source.

Alaska's state Department of Commerce publishes a list of communities indicating which have road access and which do not. This list is maintained at the state level, and is publicly available.<sup>3</sup> A sample of the current list is enclosed with this letter.

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<sup>1</sup> "Department Fast Facts," Alaska Dept. of Transportation and Public Facilities (Jan. 2019) at 8, available at: <http://dot.alaska.gov/comm/legislative/docs/Fact-Sheet.pdf>.

<sup>2</sup> Draft Report and Order ¶21.

<sup>3</sup> "Community Transportation Access and Overview," Division of Community and Economic

Alaska Communications respectfully urges the Commission, based on this list, to divide the extremely rural tier in Alaska into “on-road” and “off-road” sub-tiers for purposes of the rural health care telecom program rules. The use of this list would be administratively simple. The list states whether each of over 450 communities is accessible by road or not (Column I).<sup>4</sup> To the extent that a rural healthcare provider desires service and a service provider proposes to offer a service supported by the telecom program in a community not identified on this list as “off road,” it may be presumed that the community is accessible via the road system, unless and until parties demonstrate otherwise (for example, through a waiver petition, or by producing evidence that the state has newly designated the community as having no road access). The Commission and USAC may rely on whatever version of this list is currently available from the state.

Adoption of this proposal will in no way disturb the less rural/rural/extremely rural scheme set forth in the draft Report and Order. It will merely denote the off-road communities of Alaska as comprising an additional, off-road, extremely rural tier. Doing so will significantly improve the likelihood that telehealth services will continue to be supported in those most remote parts of Alaska, and that median rates adopted for those areas as a rural rate ceiling under the telecom program rules will be more likely to be set at reasonable levels.

Please direct any questions concerning this matter to me.

Respectfully submitted,




Karen Brinkmann

Encl: Alaska Department of Commerce Community and Economic Development, “Community Transportation Access and Overview” (downloaded July 25, 2019)

cc: Preston Wise  
Arielle Roth  
Joseph Calascione  
Travis Litman  
Randy Clarke  
Trent Harkrader

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Affairs, Alaska Department of Commerce Community and Economic Development, available at: <https://dcra-cdo-dcced.opendata.arcgis.com/datasets/community-transportation-access-and-overview>

(from the main page, click on “” and choose “Spreadsheet” to generate complete list; column “I” of the resulting spreadsheet identifies whether a community has road access).

<sup>4</sup> In a handful of cases, the list gives no indication of road accessibility, but Alaska Communications believes that is because those are not, strictly speaking, communities, but rather are regions or neighborhoods for which a simple “yes/no” designation is not appropriate.