



KODIAK AREA NATIVE ASSOCIATION

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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, SW
Washington, DC 20554

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

Chairman and Commissioners:

Thank you for the opportunity to comment on the Draft Report and Order for WC Docket No. 17-310, *Promoting Telehealth in Rural America*. I appreciate the Federal Communications Commission's work to improve the Rural Health Care (RHC) program, and hope that you will fully consider the input of the Kodiak Area Native Association (KANA) and other stakeholders responsible for delivering health services to rural Alaska before voting on the Order.

The city of Kodiak and six villages of the Kodiak Archipelago served by the Kodiak Area Native Association do not share a road system. Throughout the State of Alaska, the geography, circumstances, and infrastructure of "extremely rural" communities are unique from one region or community to the next. It is essential that whatever rules are adopted rely upon sound, open data, interpreted in a manner which recognizes the real and diverse challenges and costs that are associated with telehealth in rural Alaska.

Due to the short timeline provided for comment before the Commission's August 1 meeting, the Kodiak Area Native Association has not had the opportunity to conduct a full review of the Draft Report and Order and its potential impacts to our service delivery and the welfare of the communities, Tribes, and peoples of Kodiak. Also, it is my understanding that the Draft order provides no estimate of how it will impact program participants, and proposes to set funding based on data that does not currently exist.

I respectfully request that you remove the Draft Report and Order from the August 1, 2019 agenda, to allow additional time to develop necessary facts, and to afford stakeholders the opportunity to meaningfully review and comment on these proposals.

Sincerely,

Andy Teuber, President & CEO
Kodiak Area Native Association

CC: Senator Lisa Murkowski; Senator Dan Sullivan; Congressman Don Young