



July 25, 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: Promoting Telehealth in Rural America, WC Docket No. 17-310

Dear Chairman and Commissioners:

I am writing on behalf of Southcentral Foundation (SCF) to request that the FCC postpone consideration of the proposed FCC Rural Health Care Program Report and Order, WC Docket No. 17-310 currently on the August 1, 2019 meeting agenda. We are thankful for the effort that clearly went into developing the proposals to better meet the needs of the RHC program. However, some of the issues that we currently face in Alaska are not addressed in the proposed Report and Order, which may lead to more confusion and may present problems for healthcare delivery in rural Alaska.

Southcentral Foundation (SCF) is the Alaska Native tribal health organization designated by Cook Inlet Region, Inc. and eleven Federally-Recognized Tribes – the Aleut Community of St. Paul Island, Igiugig, Iliamna, Kokhanok, McGrath, Newhalen, Nikolai, Nondalton, Pedro Bay, Telida, and Takotna – to provide healthcare services to beneficiaries of the Indian Health Service pursuant to a compact with the United States government under the authority of P.L. 93-638, as amended, the Indian Self Determination and Education Assistance Act.

SCF provides services to more than 65,000 Alaska Native and American Indian people living in the Municipality of Anchorage, the Matanuska-Susitna Borough and 55 rural Alaskan villages. Services provided by SCF include outpatient medical care, home health care, dentistry, optometry, psychiatry, mental health counseling, substance abuse treatment, residential treatment facilities for adolescents and for women, suicide prevention and domestic violence prevention. We employ numerous staff, all of whom work in harmony to treat patients for the best access to quality care.



If approved, the delay would allow SCF to analyze the ramifications of the changes to our rural healthcare clinics under the proposed overhaul of the RHC program and allow time to have our questions answered. Currently, we are trying to better understand which of our clinics might be "Extremely Rural" vs "Less Rural" via the map included in the proposal. We also have questions regarding the perception that satellite MPLS is cheaper than terrestrial MPLS in Alaska, the proposed FCC-set "median" rates, the rural prioritization criteria, and the lack of sufficient funding increases needed year-over-year to provide the highest quality of healthcare possible in rural settings.

SCF supports over 65,000 Alaska Native/American Indian people across 100,000 square miles. Any changes to the RHC program will directly affect the 12 extremely medically underserved villages in our service area, and any reduction in RHC support will impact the quality of our healthcare delivery. We need more time to ask questions and dissect the proposal and I expect that other Rural Healthcare Providers will be writing into the FCC with a similar request.

Thank you for your consideration of our request. We look forward to a continuing dialogue with the agency on this matter.

Sincerely,  
SOUTHCENTRAL FOUNDATION

A handwritten signature in black ink, appearing to read "K. L. Gottlieb".

Katherine Gottlieb, MBA, DPS, LHD  
President/CEO