



November 30, 2018

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Promoting Telehealth for Low-Income Consumers, WC Docket Nos. 18-213

Dear Ms. Dortch:

On November 29, 2018, Hughes Network Systems, LLC (“Hughes”) met with staff from the Wireline Competition Bureau (“WCB”) to discuss its recommendations for the Federal Communications Commission’s proposed Connected Care Pilot Program and comments in the above-referenced proceeding. Hughes was represented by Jennifer A. Manner, Senior Vice President, Regulatory Affairs, Rohit Tripathi, Senior Marketing Manager, North America, and Jodi Goldberg, Associate Corporate Counsel, Regulatory Affairs. The WCB was represented by Trent Harkrader, Ryan Palmer, Jodie Griffin and Rashann Duvall.

In the meeting the parties discussed the attached talking points, explaining Hughes’ recommendations for the Connected Care Pilot Program, including that the Commission should design the program to focus on exploring the potential of each available broadband technology to deliver telehealth services, as well as on adoption mechanisms for connected care platforms and broadband services. The talking points were distributed to the attendees.

Pursuant to the Commission’s rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

/s/ Jodi Goldberg

Jodi Goldberg
Associate Corporate Counsel
Hughes Network Systems, LLC
(301) 428-7140

Attachment

cc: Trent Harkrader
Ryan Palmer
Jodie Griffin
Rashann Duvall



INCLUDING ALL BROADBAND TECHNOLOGIES IN THE CONNECTED CARE PILOT PROGRAM INCREASES LIKELIHOOD OF ADOPTION FOR LONG-TERM FUNDING INITIATIVES

Promoting Telehealth for Low-Income Consumers WC Docket No. 18-213

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- Hughes Network Systems, LLC (“Hughes”), a U.S. company, is the largest provider of satellite broadband services in the United States and globally. The Hughes network provides satellite broadband services throughout the continental United States, southeastern Alaska, Puerto Rico, and the U.S. Virgin Islands, at Federal Communications Commission (“FCC”)–defined broadband speeds of 25/3 Mbps for residential users, and 55/5 Mbps for enterprise users.
- Hughes is currently in the process of constructing its next generation, FCC-licensed, Ultra-High Density Satellite, EchoStar XXIV, which will provide service throughout the Americas at speeds of 100 Mbps or more.¹ EchoStar XXIV is expected to launch and begin commercial service in 2021.²

Given the short timelines (2-3 years) and limited resources (\$100 million) available for this Connected Care Pilot Program (“Pilot Program”), the FCC should focus on funding projects that encourage and facilitate broadband adoption, rather than new network deployments.

- Understanding why households decide not to adopt available broadband technologies is a significant prerequisite to being able to offer comprehensive and affordable at-home consultative and treatment solutions.
- By utilizing this Pilot Program as an opportunity to experiment with different configurations of broadband technologies and healthcare services, the FCC will be able to better determine the technological features needed to expand the appeal and increase the adoption of telehealth services that improve patient outcomes and reduce costs.
- By prioritizing adoption, the FCC will be able to focus on identifying the means with which to incentivize vulnerable communities to accept and maintain the necessary connectivity services that facilitate the delivery of telehealth services to the home over the long term.

Selection criteria should ensure the widest possible participation by broadband technologies in order to enable the Pilot Program to examine the capabilities of each technology to deliver on the promise of affordable, reliable, at-home connected care.

¹ Press Release, Hughes Selects Space Systems Loral to Build Next-Generation Ultra High Density Satellite (Aug. 9, 2017), available at <https://www.echostar.com/en/Press/Newsandmedia/Hughes%20Selects%20Space%20Systems%20Loral%20To%20Build%20Next-Generation%20Ultra%20High%20Density%20Satellite.aspx>.

² *Ibid.*



- Telehealth is a broad classification of available services that have varying technological demands. By including all available broadband technologies in the Pilot Program, the FCC will amass a robust understanding of the demands for the provision of telehealth services, which will enable it to optimize the deployment of resources towards an eventual larger-scale, technology neutral, telehealth funding initiative.
- By encouraging participants to focus on adoption, their proposals will have to credibly assess the connectivity demands for the successful positioning of their programs in order to ensure that they are affordable, efficient, and user friendly. This will provide the FCC with more accurate assessments of the impact of speed, bandwidth, and latency on the delivery of telehealth services.
- In order to ensure a technology neutral pilot program, the FCC should not set performance criteria. Providing this flexibility will facilitate innovative solutions, and encourage healthcare providers to seek out the most appropriate broadband solutions for the particular telehealth service they are trying to provide, in order to manage cost and increase the likelihood of adoption.

By ensuring that the Pilot Program includes all broadband technologies and by prioritizing adoption, the FCC will be able to develop a more robust study that will yield more valuable insight into the connectivity needed to facilitate connected care everywhere.