



Alaska Primary Care
ASSOCIATION

December 6, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 17-310

Dear Ms. Dortch:

The Alaska Primary Care Association, (APCA), supports the recently released draft Notice of Proposed Rulemaking and Order – WC Docket No. 17-310 – Promoting Telehealth in Rural America. We are pleased that it is on the agenda for the December 14, 2017 Commission meeting agenda and believe that positive action will foster important action on likely 2017 proration mitigation, as well as further discussion on USAC RHC modernization issues.

We offer these suggestions to improve the item.

- **Proposed limited cap relief for fy2017** – We urge the Commission to fully fund all RHC applications that were submitted during the fy2017 filing window – even if there are insufficient rollover funds. This will avoid the hardships associated with the fy2016 pro rata reductions. Our organization supports Alaska's Federally Qualified Health Centers (FQHC's) that are individual applicants, most operating in highly remote locations.
- **Extend the current application window (January 1 – April 30)** - We urge the Commission to extend the 2018 application window to ensure that applicants have adequate time to complete the application process to initiate bidding and finalize a contract.

Sincerely,

Nancy Merriman
Executive Director