

December 7, 2017

By Electronic Filing – Notice of *Ex Parte* Communication

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

Dear Ms. Dortch:

On behalf of Alaska Communications, I had telephone conversations on December 6, 2017 with Amy Bender of Commissioner O’Rielly’s office, and on December 7, 2017 with Jay Schwarz of Chairman Pai’s office, concerning issues raised in the above-captioned proceeding.

Specifically, Alaska Communications supports an immediate increase in the budget for the rural health care (“RHC”) support program, and requests that the Commission seek comment in its Notice of Proposed Rulemaking on the following:

- If applicants are required to submit more of their competitive bidding documentation (including losing as well as winning bids, and more detailed descriptions of the proposed technology and service parameters), the Commission should seek comment on making this information available to the public, as USAC does with E-rate contract bid information.¹
- If the Commission desires that applicants propose projects that would make coordinated use of support and supported facilities across the RHC program and for other programs, such as the Schools and Libraries program, what would be the appropriate mechanics of a joint application process, the standard of review of such applications by USAC, and the compliance measures associated with such a joint or coordinated use of funds for multiple purposes?
- In very rural areas such as Bush Alaska, patients often require communications links between their homes and the RHC clinic in order for health care

¹ *Modernizing the E-Rate Program for Schools and Libraries*, Report & Order and Further Notice of Proposed Rulemaking, WC Docket No. 13-184, 29 FCC Rcd 8870, 8935-38 (2014) (FCC directs USAC to prospectively publish prices of goods and services contained in bids to applicants, beginning in funding year 2015).

professionals to remotely monitor patients, saving money and improving patient outcomes. Under current rules, the transmission link between a RHC facility and a patient premises is not eligible for support. Should the Telecom Program be expanded to cover this type of beneficial telecommunications connection?

- The draft NPRM has been perceived by some Alaska parties as critical of the relatively high proportion of RHC support previously received in the state, but the needs of Alaska RHC providers typically are on a much larger scale (as well as differing in kind, in many parts of the state) from those of RHC providers in less remote locations such as the Lower 48 states. The Commission should acknowledge that geographic diversity is not necessarily an indicator of “waste” in the RHC program. The RHC program appropriately focuses on *rural* health care services, and Alaska simply has more rural geography than any other state in the nation.
- Finally, the NPRM should address perceived inefficiencies not only among applicants but at USAC as well. The Commission should seek comment on (i) adopting timetables, transparency requirements, and other procedural tools that could reduce USAC processing delays and give applicants greater certainty, and (ii) updating the substantive standards for the Telecom Program to help USAC evaluate the advanced services and technologies that are proposed in RHC applications.

Please direct any questions concerning this matter to me.

Respectfully submitted,



Karen Brinkmann

KAREN BRINKMANN PLLC

1800 M Street, N.W., Suite 800-North

Washington, D.C. 20036

(202) 365-0325

KB@KarenBrinkmann.com

Counsel to Alaska Communications