



4805 Towne Centre, Suite 100 Saginaw, MI 48604
Toll Free: 888-964-2227, Fax: 989-753-2655
www.mictatech.org, micta@mictatech.org

December 9, 2017

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

“Re: WC Docket No.17-130, Promoting Telehealth in Rural America”

Dear Secretary Dortch,

This letter represents MiCTA’s response to the “Order” portion of the Commission’s Notice of Proposed Rulemaking and Order, Section IV. Order, A., Carrying Forward of Unused RHC Program Funds for FY 2017, released on November 22, 2017.

Overview

MiCTA, formerly the Michigan Collegiate Telecommunications Association, was created in 1982 as a professional organization of telecommunications directors at Michigan's public universities. Originally, MiCTA served as a forum to share information among the universities, and has expanded to provide needed services. MiCTA now serves thousands of members across the country representing public sector and non-profit entities such as: Higher Education, K-12, Health Care, Libraries, State, County and Municipal Governments as well as non-profit Religious and Charitable organizations.

Of the many services MiCTA provides to its members we believe that coordinating group purchasing programs and aggregating member demand to facilitate members' purchases of competitively bid products and services to be one of the most important. On behalf of its Healthcare membership MiCTA has filed multiple times encouraging the Commission to expand the capabilities of the RHC Program.

Comments

IV. Order

A. Carrying Forward of Unused RHC Program Funds for 2017

105.

MiCTA commends the Commission's proposed Order that seeks "to commit up to the amount of any unused funds carried forward from prior years to the RHC Program's FY 2017 to reduce the proration."

However, the fact that the average discount individual rural healthcare providers received in FY 2016 under the Telecom Program was as high as 98 percent with an average of 91 percent as stated by the Commission in its November 22, 2017 NPRM, II Background, 11., demonstrates a stark difference between the fixed 65 percent funding of the Healthcare Connect Fund.

Given this information MiCTA believes that the Commission's statement in 105. Para 2, "We direct USAC to put unused RHC Program funding available at the time of the proration into the RHC Program for FY 2017 funding to lower or eliminate the proration factor **first of all for all qualifying funding requests from non-consortia rural healthcare providers**" would be an extremely unfair decision allowing individual rural healthcare providers to receive an even larger share of RHC Program funds.

We therefore ask the Commission to reconsider its proposed decision and direct USAC to distribute "unused funds carried forward from prior years" in a fair and equal manner for all RHC FY 2017 approved applicants as well as applying any proration that may need to be administered in the same manner.

Respectively submitted on behalf of MiCTA,

Gary L. Green
MiCTA Consultant
E-Rate/Rural Health Care
National Programs
Cell 231-881-6612
gary.green@mictatech.org