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The Honorable William E. Kennard, Chairman
Federal Communications Commission
1919 M Street, Room 814
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: USAC PLAN OF REORGANIZATION, CC DOCKET NOS. 97-21 AND 96-45, AND DA 98-1336

Dear Chairman Kennard:

On behalf of the Montana Office of Rural Health, I am writing to comment on the proposed consolidation of the Rural Health Corporation (RHCC), Schools and Libraries Corporation (SLC), and the Universal Service Administration Company (USAC). I recommend that, at a minimum, **rural health** be given an **equal number of representatives** on the USAC board as other constituencies served by universal service provisions such as schools and libraries. Other issues of concern that I think should be addressed are:

- the full USAC board will be better served by an advisory committee entirely composed of members possessing experience in **rural health** and **telehealth** services;
- the telecommunications needs for the delivery of health care services to **rural and frontier** Americans requires special expertise, which is not currently reflected in the proposal; and
- a level playing field is necessary so that **parity exists** between all of the constituents of universal service.

Delivery of **rural health** care services in Montana is a constant challenge and we look forward to equitable opportunities under the universal service provisions. Montana is the fourth largest state in the U.S., ranking 44th in population with only 880,00 people and all but two of the state's 56 counties are designated either **frontier** or **rural** by federal definition. Delivery of health care in the state is complicated by sparsity of providers, geographically remote communities, long travel distances, numerous unpaved roads, inclement weather, long winters, economic decline and poverty, and an aging population base. Health care is the number one economic industry in the state and the number one source of jobs.

Thank you for the opportunity to submit comments on this issue that is so critical to our state.

Sincerely,

David M. Young
David M. Young, Director
Montana Office of Rural Health

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