

EX PARTE OR LATE FILED

Representing New York State's
Not-For-Profit Hospitals, Health Systems,
and Continuing Care Providers

75 years
1925



HEALTHCARE ASSOCIATION OF NEW YORK STATE

November 2, 2000

NOV 8 2000

F12

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Ultra-Wideband (ET Docket 98-153)

Dear Ms. Salas:

The Healthcare Association of New York State (HANYS) represents over 550 not-for-profit and public hospitals, nursing homes, home health agencies, hospices, and other similar providers throughout New York State. We are writing on behalf of our members regarding the Federal Communications Commission's (FCC's) Notice of Proposed Rulemaking concerning Ultra-Wideband (UWB) radio transmission.

HANYS is integrally involved in the development of Telehealth and Telemedicine related technology applications to establish new ways of increasing access to medical services in rural, remote and/or medically underserved areas of New York State. As we examine various applications to an Internet/Intranet environment, we are aware there exists tremendous potential for high-bandwidth wireless technology. The UWB technology offers the growing Telehealth and Telemedicine field the capability of transferring very large data files between health care providers across short distances.

Rural, sole-community hospitals, and other health care providers in many areas of New York have few sources of support for bringing technology into their facilities. Many rural and medically underserved areas of our state are eligible for support for telecommunications services under the federal universal services program (USP). However, the USP does not cover internal connections at all, and as medical information, clinical, and administrative functions move online it is imperative that our members be able to take advantage of low cost networking UWB technology. In addition, older buildings and traditional wired networking have proven extremely expensive and prohibitive for rural providers. The UWB technology enables rural health care providers and other institutions an opportunity to avoid costly and disruptive interior wiring projects and provide an inexpensive, low cost and high-speed wireless connectivity for local area networks (LANs). Also, such technology affords clinicians the opportunity to use a variety of monitors, personal digital assistants (PDAs), laptops, and other devices in a highly mobile environment.

MAIN HEADQUARTERS
One Empire Drive, Rensselaer, New York 12144
phone (518) 431-7600 / fax (518) 431-7915
www.hanys.org

WASHINGTON, D.C. OFFICE
499 South Capitol Street SW, Suite 405, Washington, D.C. 20003
(202) 639-1502 / fax (202) 639-9542

- TRUSTEES**
- Chairman*
- WILLIAM F. STRECK, M.D.
Coopersstown
Chairman-Elect
- GARY S. HORAN
Bronx
Secretary
- BONNIE H. HOWELL
Ithaca
Treasurer
- JOHN R. SPICER
New Rochelle
Immediate Past Chairman
- GLADYS GEORGE
New York
Past Chairmen
- JOHN F. FRIEDLANDER
Buffalo
- DAVID P. ROSEN
Jamaica
- LEO P. BRIDEAU
Rochester
- 2000**
- KENT A. ARNOLD
Syracuse
- THERESA A. BISCHOFF
New York
- C. WILLIAM BROWN
Rochester
- DAVID R. DANITZKER, M.D.
New Hyde Park
- BARRY R. FREEDMAN
New York
- J. RONALD GAUDREAU
Huntington
- BONNIE J. HOLLENBROCK
Geneva
- ALAN R. MORSE, J.D., PH.D.
New York
- ROBERT G. NEWMAN, M.D.
New York
- 2001**
- RONALD R. ADRICH
Melville
- FREDERICK D. ALLEY
Brooklyn
- DAVID J. CAMPBELL
New York
- FRANCIS J. GIROY, M.D.
Binghamton
- PAUL CANDINO
Buffalo
- DONALD W. DAVIS
Mount Kisco
- MARTIN J. DELANEY
Mineola
- STEVEN J. GOLDSTEIN
Rochester
- DONALD E. JOSLIN
Utica
- LUIS R. MARCOS, M.D.
New York
- BRUCE C. POTTER
Potsdam
- 2002**
- CHESTER D. AMONDI
Syracuse
- GREGOR ANDERSON
Nyack
- JAMES BARBA
Albany
- DONNA G. CASE
Goshen
- SISTER MARIE CASTAGNARO
Elmira
- JOSEPH P. CORCORAN
New York
- JAMES CORRIGAN
Buffalo
- JOHN W. JOHNSON
Malone
- RICHARD KETCHAM
Dunkirk
- DAVID G. KRUCZNICK
Glens Falls
- FRANK J. MADDALENA
Brooklyn
- STEPHEN S. MILLS
Flushing
- PAUL ROSENFELD
Staten Island
- President*
- DANIEL SISTO

No. of Copies rec'd 0
List ABCDE

Magalie Roman Salas
November 2, 2000
Page 2

NOV 8 2000
FCC

HANYS' members are increasingly looking for ways to communicate electronic patient medical records, including high-resolution images among wireless LAN users within facilities and/or among their affiliates and networks. In rural and medically underserved areas of our state, UWB technology can serve to facilitate medical specialty consults, obtain expedited second opinions involving patient care, transmit critical data to and from emergency service departments, and provide decision-making support by specialists at the point of patient care where it is especially vital. For example, bringing knowledge sources and medical databases via Internet connectivity through wireless LANs to the patient's bedside, hospitals are in a better position to reduce medical errors, a national issue highlighted in the Institute of Medicine's recent report titled, "To Err is Human: Building a Better Health System."

HANYS encourages the FCC to support UWB technology and move forward judiciously in its rulemaking activities. This technology has tremendous potential to enhance our members' ability to develop "electronic-health" applications that can contribute to helping improve clinical performance, improved quality of care outcomes, administrative efficiency, and assist in the reduction of medical errors. In addition, secure wireless connectivity to LAN systems will assist hospitals and health care providers to ensure safe, reliable, and accurate transmission of patient care records and other sensitive data required by the administrative simplification provisions of the federal Health Insurance and Portability and Accountability Act of 1996 (HIPAA). As you are aware, all of these areas are high priorities of state and federal health agencies.

HANYS is excited about the prospects for UWB. We look forward to working further with the FCC to help develop and implement useful clinical and administrative applications for our health care institutions and the thousands of patients our members serve. We hope the FCC will favorably view the possibilities of UWB for health care in its rule making activities. Thank you for consideration of our comments.

If you have any questions, you may contact James Bilby, Director of Regulatory Affairs and Rural Health at (518) 431-7721, or via email at jbilby@hanys.org. We look forward to working together on this important matter.

Sincerely,



Daniel Sisto
President

DS:cm