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May 29, 2002

Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Subject: Re-designation of Urban Area for Rural Health Care Program in the Pacific Insular Areas

Dear Chairman Powell and Commissioners:

Guam Memorial Hospital Authority is in full support of the comments by the Governor of Guam regarding the redefinition of Honolulu as the urban center for Guam for the Rural Health Care Program.

In a 1998 report on health care status in the U.S. associated Pacific Basin jurisdictions, the Institute of Medicine recommended to *"... support distance-based learning and telemedicine consultations, ... explore ways to decrease costs for health telecommunications, ... [and] seriously explore the establishment of educational links within the region and with other areas of the world."*

Re-designating Honolulu as the urban center for Guam would open the way to promising health-related distance learning and telemedicine applications that support the recommendations from the Institute of Medicine.

For years, the high cost of telecommunications on Guam and in the Pacific Basin, e.g. \$200,000 a year for a standard T-1 line between Guam and Hawaii, has hampered many efforts to develop and implement such projects. The potential benefits are enormous, from improving access to specialty consultations, - thus reducing the need for costly off-island referrals -, to building local capacity by providing quality continuing health and medical education, through simply improving communications among providers in the Pacific and with the mainland, and reducing the feeling of professional isolation that prevents us from retaining skilled providers.

More specifically, discounted telecommunications between Guam and Honolulu would provide affordable access to the State of Hawaii Telehealth Access Network (STAN) for Guam Memorial Hospital, the Department of Public Health and Social Services, the Department of Mental Health and Substance Abuse, and the University of Guam College of Nursing. In these times of declining budgets, rising unemployment and poor economy on Guam, savings could reach over \$200,000 for each of these agencies in communications costs alone, notwithstanding the indirect savings resulting from improved clinical outcomes.

Guam Memorial Hospital has been participating for almost two years now in the development of local and regional telehealth plans that establish the needs of our populations, and offer technological solutions to the health care issues we are facing. These plans rely heavily upon basic telecommunications services that are still not affordable to most of us in the Pacific Basin.

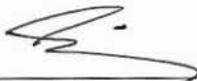
In comparison, all of the hospitals on the neighbor islands of Hawaii that are connected to the STAN network are current recipients of discounted telecommunication services under the Rural Health Care program, including the outpatient clinics of the Veterans Administration. With a far greater isolation, and in spite of its full participation to the Universal Service Fund, Guam remains ineligible for similar discounts.

I hope that the Federal Communications Commission will reconsider this issue, and re-designate Honolulu as the urban center for Guam and for the other U.S. associated Pacific Basin jurisdictions for the purpose of the Rural Health Care Program.

If you need further information, or if I can be of any assistance, please do not hesitate to contact me at (671) 647-2211.



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