



ALASKA NATIVE TRIBAL HEALTH CONSORTIUM

Division of Information/Technology

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

Dear FCC Secretary:

This letter is in support of comments made by Commissioner Joel Gilberston of the State of Alaska Department of Health and Social Services regarding policy changes to the Universal Services Administrative Company (USAC) program for rural health care telecommunications funding support. The USAC programs have been a vital part of telehealth efforts in Alaska. The telehealth programs of the Alaska Native Tribal Health Consortium (ANTHC) serve 204 villages in Alaska. Without the support of USAC/RHCD funding, many of these villages would not have access to telehealth. The stated purpose of the FCC's NPRM is to "expand outreach efforts" and "to streamline the application process," but some of the proposed changes could shrink the footprint of the program and complicate the application process.

In his comments to the FCC regarding the definition of "Rural Area," Commissioner Gilbertson expresses concern that adopting Rural Urban Commuting Area (RUCA) codes as a method for defining rural areas in Alaska could adversely impact some of the areas in Alaska which currently receive USAC/RHCD support. Specifically, he mentions areas like Juneau and Kenai. I share this concern and urge the FCC to carefully consider how it defines rural so that ANTHC will be able to continue providing telehealth services to all areas of Alaska.

It is my understanding that the Office of Rural Health Policy defines all areas in metropolitan counties with RUCA codes 4-10 as "rural." If the FCC uses this same approach, there would not be a change in the eligibility of Alaska communities like Fairbanks, Juneau, and Kenai. However, the Whitehouse Office of Management and Budget last summer released a list that included Fairbanks North Star Borough (County) as a metro area. If the FCC uses RUCA as a guideline to define rural, and it uses data from OMB to supplement that, the two may be in conflict.

Many federal agencies have defined "rural" for the purposes of programs and funding mechanisms. Often these mechanisms do not agree with each other. If an area is "rural" according to one federal definition, it should be consistent with others.

I understand the need to have an up-to-date, easy-to-use mechanism for defining rural areas, and I urge the FCC to adopt a solution that:

1. Grandfathers existing areas currently defined as rural under USAC/RHCD
2. Has a well-defined appeal process that will allow organizations to appeal their exclusion by demonstrating that they are recognized as “rural” by other federal agencies.
3. Simplifies the application process and allows for expanded use of USAC/RHCD programs by Alaskans.

ANTHC supports the continued growth and improvement of USAC/RHCD programs as a means to continually improve access to care for Alaskans. Since most specialty service providers needed for telemedicine support are only available in Anchorage, exclusion of “rural” towns such as Fairbanks and Juneau would be contrary to the USAC/RHCD desires. Thank you for the opportunity to comment on these proposed changes.

Sincerely,

Richard A. Hall
Director of Information Technology
Alaska Native Tribal Health Consortium