



NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

The Voice of Rural Telecommunications

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**WC Docket No. 02-60 Rural Health Care Pilot Program –
NLR petition for reconsideration
NTCA’s Comment Matrix Updated 12-13-06**

Commenter	Position	Support/Oppose
NTCA	Expand to include other dedicated nationwide broadband networks, including NLR and Internet2. Use the Pilot Program to encourage applicants to interconnect with other providers. Pilot program’s effects can last beyond 2 years as some health care may be reluctant to change backbone providers. Use competition in the pilot program.	Supports using NLR, Internet2, and other backbone providers
Internet2	Internet2 should be only backbone provider in Pilot. Internet2 has lots of experience in telemedicine, interconnecting networks and is backed by Level 3. 11-29-06 ex parte re: Internet2, using more than one backbone for the pilot.	Opposes using NLR
NLR	FCC should grant petition to advance healthcare. NLR asked Internet2 for interconnection, but Internet2 refused. NLR has a neutral network. Open the Pilot to encourage interconnection to NLR. Risky to depend on 1 backbone network. Need to experiment with more than one backbone.	Petitioner. Supports Petition.
AT&T	Internet2’s opposition is self-serving. Adoption of basic network performance criteria can alleviate concerns for pilot. If allow Internet2 as sole source, then you remove incentive for Intenet2 to connect with NLR or other healthcare backbones. This maintains competitive neutrality and enhances competition.	Supports using NLR, AT&T, and other backbone providers
Amer. Telemedicine Assn.	No good reason to limit pilot program to 1 backbone provider. Health providers need choices in networks. Designing a single type will raise costs.	Supports using NLR, Internet2, other backbone providers
HIMSS	Healthcare industry association using Internet2. Pilot program works only if have one network. NLR does not connect to Internet2. Would weaken pilot if use more than one backbone.	Supports Internet2, Opposes using NLR
Arizona State Univ.	Uses Internet2. Does not use NLR. Pilot program should use 1 backbone.	Supports Internet2
UCAR - Nat. Center for Atmosphere Research (CO, WY, UT)	Uses Internet2 and NLR. State and regional networks should not be limited to 1 backbone provider, even for the pilot program.	Supports using NLR, Internet2, and other backbone providers.



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Georgia Tech. Office Of Information Tech.	Uses both Internet2 and NLR. Southern Crossroads – regional network. NLR is equal in scope, with different characteristics. Internet2 and NLR could peer with each other. Sanctioning just one is monopolistic practice. FCC should require interconnection with other networks as condition of pilot program.	Supports using NLR and Internet2
Univ. of Louisville, KY	Uses Internet2. Have 1 backbone provider for pilot. NLR has different capabilities.	Supports Internet2 only.
Univ. of PA - MAGPI	Chose Internet2 over NLR a year ago. Does not interface with NLR.	Supports Internet2, opposes NLR
LEARN – Texas – James Williams	Encourage proposals that use either Internet2 or NLR. Access to both is a strength and provides more capability and flexibility. 33 TX higher ed. Institutes. LEARN is building a TX backbone network. Internet2 is transitioning to new technology.	Supports using NLR and Internet2
Univ. of Utah	Uses Internet2. Healthcare networks must be interconnected and interoperable. Use 1 network for pilot.	Supports Internet2
Virginia Tech	Uses both Internet2 and NLR. NetworkVirginia serves telehealth. NLR costs less than Internet2. NLR and Internet2 could interconnect. Require interconnection with networks to participate in pilot program.	Supports using both NLR and Internet2



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