



Eden Medical Center

A Sutter Health Affiliate

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Federal Communications Commission
Office of the Secretary

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Dear Mr. Chairman,

We have been made aware that the FCC is considering revisions in the Universal Service Fund (USF) contribution methodology that, according to our review, may have an adverse impact on our organization's ability to maintain emergency response standards. It is our understanding that certain components of these revisions, if applied to paging services, would lead to significantly increased costs as the carriers will pass through those costs to their customers.

Our organization relies heavily on paging services for our emergency response and public safety communications. Today, we pay less than 10 cents per month in USF charges for each pager, and often less than 5 cents. Replacing these revenue-based charges with a flat \$1.00 charge would dramatically raise our costs (by as much as 30% overall) for these services, causing our organization to revisit its use of the services. At a time when budgets are already stretched and in an uncertain economy, this is not a welcome surprise.

As a result of the increased costs we, or our communication partners, will be forced to re-evaluate our communication strategy. These revisions will likely lead us to reduce our communications usage in order to offset the increased costs. As a result, we feel that public safety and interoperability could be adversely impacted.

We are in the business of public safety. We understand the USF goals are also aligned with the public interest as the USF helps defray the cost of telephone service in rural areas and for low-income consumers as well as provides subsidies to schools, libraries, and rural health clinics. However, we feel these revisions will run counter to the interests of the public. Therefore we urge you to reconsider the changes taking into account the adverse impact they may cause for public safety issues.

Sincerely,

Peter Laidlaw
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