

# American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN™



December 4, 2009

141 Northwest Point Blvd  
Elk Grove Village, IL 60007-1098  
Phone: 847/434-4000  
Fax: 847/434-8000  
E-mail: [kidsdocs@aap.org](mailto:kidsdocs@aap.org)  
[www.aap.org](http://www.aap.org)

Federal Communications Commission  
445 12<sup>th</sup> St SW  
Washington, DC 20554

## Executive Committee

### President

Judith S. Palfrey, MD, FAAP

### President-Elect

O. Marion Burton, MD, FAAP

### Immediate Past President

David T. Tayloe, Jr, MD, FAAP

### Executive Director/CEO

Errol R. Alden, MD, FAAP

## Board of Directors

### District I

Edward N. Bailey, MD, FAAP  
Salem, MA

### District II

Henry A. Schaeffer, MD, FAAP  
Brooklyn, NY

### District III

Sandra Gibson Hassink, MD, FAAP  
Wilmington, DE

### District IV

Francis E. Rushton, Jr, MD, FAAP  
Beaufort, SC

### District V

Marilyn J. Bull MD, FAAP  
Indianapolis, IN

### District VI

Michael V. Severson, MD, FAAP  
Brainerd, MN

### District VII

Kenneth E. Matthews, MD, FAAP  
College Station, TX

### District VIII

Mary P. Brown, MD, FAAP  
Bend, OR

### District IX

Myles B. Abbott, MD, FAAP  
Berkeley, CA

### District X

John S. Curran, MD, FAAP  
Tampa, FL

To Whom It May Concern:

Thank you for the opportunity to comment on the healthcare delivery elements of the National Broadband Plan (NBP Public Notice #17). The American Academy of Pediatrics (AAP) is a national, non-profit organization of 60,000 pediatricians committed to the attainment of optimal physical, mental, and social health and well-being for all infants, children, adolescents, and young adults.

The attachment includes the AAP's responses to the questions posed in your call for public comment. Thank you for your consideration. If you have further questions, please contact Beki Marshall, Manager, Health Information Technology Education and Implementation, at 800/433-9016, ext 4089 or [bmarshall@aap.org](mailto:bmarshall@aap.org).

Sincerely,

A handwritten signature in black ink that reads "Judith S. Palfrey".

Judith S. Palfrey, MD, FAAP  
President

JSP/rm

**COMMENTS – NBP PUBLIC NOTICE #17**  
**Submitted on behalf of the American Academy of Pediatrics**

4. *Health IT Use Drivers and Barriers*

A key issue with regard to the adoption of health information technology in physician offices is the need for a dependable broadband Internet connection. For many small office practices, the Application Service Provider (ASP) model of electronic health records can create a more affordable alternative to an on-site server-based application. However, even a short-time interruption of service is unacceptable as health care providers will have no access to patient records. Outages must be corrected as soon as possible, and Internet service providers must respond quickly to correct errors and restore service to healthcare providers. The fear of losing Internet-based access to patient records may lead healthcare providers to maintain their paper-based systems. The situation can be equally dire in the inpatient setting. In some instances, hospitals may find their accreditation at risk if an Internet disruption means that patient records are inaccessible.

Disruptions in Internet service can also have serious financial consequences for both hospitals and ambulatory practices. Lack of access to patient records may force an outpatient practice to shut down or revert to paper records until Internet access is restored. Once Internet access becomes available again, the practice would then be forced to expend staff time entering the paper-based data into the electronic records. In inpatient settings, a study of hospital downtime in a 500-bed hospital found that each downtime minute costs about \$264 or \$15,840/hour<sup>1</sup>.

---

<sup>1</sup> Anderson M. The toll of downtime: A study calculates the time and money lost when automated systems go down. *Healthcare Informatics*. 2002; April 19(4):27-30