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**COLLEGE OF MEDICINE**  
DEPARTMENT OF  
**OBSTETRICS & GYNECOLOGY**

UNIVERSITY OF ARKANSAS FOR MEDICAL SCIENCES

February 22, 2010

Chairman Julius Genachowski  
Commissioner Meredith Attwell Baker  
Commissioner Mignon Clyburn  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell

Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: GN Docket No. 09-191

Dear Chairman Genachowski and Commissioners:

The University of Arkansas for Medical Sciences (UAMS) is the home of Arkansas' only teaching hospital, with clinics covering every medical specialty and a staff of more than 1,100 doctors, and is committed to improving the health of Arkansans. UAMS interacts with people from differing racial, socioeconomic, and geographic backgrounds, including the disabled. We feel our everyday interactions provide us with a unique perspective on what the Federal Communications Commission should consider when mulling the implementation of new network neutrality principles.

We are writing these reply comments in response to the FCC's Notice of Proposed Rulemaking concerning net neutrality (GN Docket No. 09-191). Thank you for providing us with the opportunity to comment. The University of Arkansas for Medical Sciences believes a well functioning and open internet are vital to supporting the new and lifesaving applications that will impact the lives of so many Americans. *Chairman Genachowski heard first hand in Pine Bluff, Arkansas how the ANGELS Program has had a great impact on the patients here in Arkansas.*

It is our firm belief that before the FCC imposes any new network neutrality principles it consider the impact such changes will have on emerging telemedicine applications and telemedicine users, who are often members of disadvantaged populations. In particular we are concerned that the nondiscrimination principle could prohibit telemedicine users from obtaining

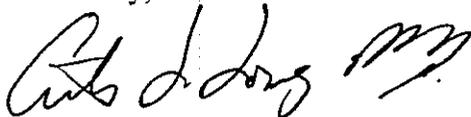
the quality of service enhancements which would allow for priority access to critical applications. In addition, we believe the FCC should remain committed to ensuring that broadband internet access is available to 100% of the population, including our patients, employees, doctors, nurses, and staff. This will enable them to retrieve valuable medical information and use revolutionary telemedicine applications, such as the remote monitoring of diabetes and heart disease.

Lastly, and most important to us at the University of Arkansas for Medical Services, we believe the FCC must test the proposed additions to net neutrality provisions in the NPRM to ensure that they do not stifle the technological innovation that has led to the development and implementation of life-saving telemedicine applications that improve the quality of life of patients with broadband internet access.

Without tested and reliable net neutrality principles that allow for quality of service enhancements programs like our Antenatal and Neonatal Guidelines, Education and Learning System (ANGELS) system might be jeopardized. Through this system we deliver obstetric and neonatal care to women in rural areas within Arkansas. The system utilizes interactive compressed video delivered via broadband internet access. This video, along with weekly telemedicine conferences, enable physicians to confer with maternal-fetal medicine specialists in real-time about individual cases. In addition, ultrasounds can be read in real-time, which is a great benefit to rural patients and doctors. Innovation delivered via reliable broadband internet connections has allowed us to bring subspecialty support directly to hometowns to the benefit of expectant mothers and unborn and newborn children.

We sincerely hope the FCC takes the time to understand and analyze our concerns before moving forward with additional net neutrality principles. Only with reliable and affordable broadband connections will we realize the full benefits that telemedicine has to offer.

Sincerely,



Curtis L. Lowery, M.D.

*Director, Center for Distance Health*

*Director, Antenatal & Neonatal Guidelines, Education and Learning System*

*University of Arkansas for Medical Sciences*