



as networks capable of speeds of 10 Mbps or more.<sup>4</sup> Current wireless services and infrastructure provide consumers with a variety of health care services and devices that are making possible the improvement of health and health care for rural and urban Americans alike, the Commission should adopt policies to continue the growth of mobile health services and applications as recommended by CTIA.<sup>5</sup> Motorola is a leading provider of Health IT solutions, including mobile computing devices capable of bedside bar coding as well as displaying electronic health records, next-generation wireless solutions such as that being deployed at the Memorial Medical Center of West Michigan<sup>6</sup> and fixed wireless broadband solutions deployed in rural areas<sup>7</sup>. Further acceptance and use of these technologies, which help reduce medical errors and speed diagnosis and treatment through positive patient identification (PPID), will be hampered if patients and health care professionals are unable to transmit sensitive health-related information over broadband networks due to a lack of high speed infrastructure. For this reason Motorola supports the Commission's efforts to encourage the expansion of dedicated high speed

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<sup>4</sup> *Id.*

<sup>5</sup> Comments of CTIA – The Wireless Association, WC Docket No. 02-60, at 5-10 (filed December 4, 2009).

<sup>6</sup> The Memorial Medical Center of West Michigan is a 98-bed independent acute care hospital serving several counties along the shore of Lake Michigan, Motorola wireless networks provided a reliable, secure high-performance system which provided mobility for clinical applications, guest access for patients, visitors and vendor without compromising network security, [http://www.motorola.com/staticfiles/Business/Solutions/Industry%20Solutions/Healthcare/documents/Memorial%20Medical%20Center%20of%20West%20Michigan\\_FINAL.pdf?localeId=33](http://www.motorola.com/staticfiles/Business/Solutions/Industry%20Solutions/Healthcare/documents/Memorial%20Medical%20Center%20of%20West%20Michigan_FINAL.pdf?localeId=33).

<sup>7</sup> One small town medical clinic in the Southwestern U.S., serving a community of 2,500 and a county of 10,000 capitalized on a community broadband access grant to build out the wireless network infrastructure to link four regional hospitals with-in a 30 mile radius of its facility and resulted in the ability to remotely monitor patients, share patient diagnostic data, improve the overall patient care and attract new doctors while providing a cost savings of thousands of dollars on a monthly basis, [http://www.motorola.com/staticfiles/Business/Solutions/Wireless%20Broadband%20for%20Healthcare/\\_Documents/\\_Static%20files/Wireless%20Broadband%20Breathes%20New%20Life%20into%20Rural%20Medicine.pdf?localeId=33](http://www.motorola.com/staticfiles/Business/Solutions/Wireless%20Broadband%20for%20Healthcare/_Documents/_Static%20files/Wireless%20Broadband%20Breathes%20New%20Life%20into%20Rural%20Medicine.pdf?localeId=33).

networks for the health care industry by imposing a 10 Mbps floor for infrastructure projects supported by the health infrastructure program.

The Commission also seeks comments on the potential imposition of requirements related to network reliability and quality of service for infrastructure supported by the program. The Commission cites an *ex parte* letter filed by Internet2, which suggests specific requirements for packet loss, jitter, latency, and “bursts” to illustrate the types of requirements that it may consider.<sup>8</sup> However, the suggestion by Internet2 is focused on meeting the needs for teleconferencing, according to “a purveyor of today’s teleconferencing product.”<sup>9</sup> While Motorola does not dispute the fact that teleconferencing is a major application in the e-health landscape, we do not believe that this single application should constitute the Commission’s baseline quality and reliability requirements for its entire healthcare network infrastructure plan.

Moreover, the *National Broadband Plan* highlights the critical importance of providing high speed broadband services to currently unserved or underserved areas.<sup>10</sup> This goal is especially important as it pertains to the deployment of the critical health services networks that are the subject of the *NPRM*. As such, the Commission’s first priority should be to ensure that broadband networks are expanded quickly and efficiently to these areas. If the Commission chooses to impose detailed technical requirements on health services infrastructure projects, it may discourage investment in broadband infrastructure projects and even foreclose the use of certain technologies, such as television white spaces and other unlicensed frequency bands, for health care

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<sup>8</sup> Internet2, *Ex Parte*, GN Docket No. 09-51 and 02-60 (June 25, 2010) at 1.

<sup>9</sup> *Id.*

<sup>10</sup> See Federal Communications Commission, *Connecting America: The National Broadband Plan* at chapter 10.5 and recommendation 10.7 (released Mar. 16, 2010) (*National Broadband Plan*).

infrastructure projects entirely. For these reasons, Motorola does not believe that the Commission should impose detailed requirements related to levels of reliability, physical redundancy, or quality of service with respect to health care networks supported by the health infrastructure program at this time.

Respectfully submitted,

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