

Center for Telehealth and Cybermedicine Research

December 21, 2010

Sharon Gillett, Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Reference: Docket No. 02-60.

Dear Ms. Gillett:

This letter is a request for an extension of the June 2011 deadline for filing the Form 465 and 466 packages for the **Southwest Telehealth Access Grid (SWTAG)** Rural Health Care Pilot Program (RHCPP) for a period of one year. In addition, this letter includes a request to waiver of the requirement in the Order that the Pilot Program be limited to three Funding Years.

The SWTAG project is designed to serve the citizens of the southwestern region of the United States well and its goals and objectives are of significant value to our communities in New Mexico, Arizona, and the Albuquerque Area IHS office and the tribes it represents. The Southwest Telehealth Access Grid (SWTAG), an approved Project within the Federal Communication Commission's Rural Health Care Pilot Program, was approved to develop an integrated interstate network of networks built upon the extensive experience of key participants in rural telemedicine and rural healthcare. The primary goal is to extend and leverage existing and planned statewide networking infrastructure initiatives and investments to create this telehealth access grid of rural healthcare telemedicine systems and integrate the high-speed Internet backbones offered by Internet2 and National Lambda Rail with appropriate security and quality of service. Another year extension would allow us to integrate Internet2 and/or National Lambda Rail into our regional network of networks in the most appropriate and effective manner.

The original plan was to self-provision an overarching Network Design Study that would then guide the specific stakeholder's network modifications necessary for each to most effectively contribute to this 'network of networks.' However, in response to the current global economic situation, and as reported in the SWTAG's Quarterly Progress Reports, the Project has shifted its priority away from the overall network of networks design to focus on individual stakeholder infrastructure needs first and foremost.

One SWTAG strategy to expedite the provision of telehealth services to rural citizens has been to incorporate new eligible health care provider stakeholders, as permitted by RHCPP program rules. This strategy is intended to assist stakeholders to develop and enhance broadband connectivity in support of key participants in rural telemedicine and rural healthcare.

Another evolving strategy is developing a strategic plan in collaboration with the state-wide health information exchange (HIE) network of networks being developed by LCF Research as the New Mexico Health Information Collaborative (NMHIC) that can better integrate telemedicine with electronic health records and HIE to form a meaningful sustainable healthcare network. An additional year extension will better allow this concept to be developed as part of our RHCPP SWTAG and the NMHIC strategic plan to form a true network of networks using broadband infrastructure to link appropriate healthcare stakeholders.

Each individual stakeholder's objectives are reinforced by the SWTAG goal to extend and leverage existing and planned statewide networking infrastructure initiatives and investments to create a telehealth access grid of rural healthcare telemedicine systems, particularly with the integration of high-speed Internet backbones offered by Internet2 and National Lambda Rail. This project entails a complex integration of individual network of networks that is designed to support telemedicine, health information exchange, public/population health, emergency preparedness and response. This integration creates several challenges in coordination and implementation but can serve as a national model developing the Nationwide Health Information Network (NHIN) and the Public Health Information Network (PHIN).

Despite the diligent efforts of the SWTAG and its staff, the desired impact from the RHCPP has not been realized as hoped. We share the concerns of many other of our RHCPP peers nationally that we will be unable to meet the June 2011 deadline for submitting final project documents necessary, and encumber the funds to benefit from this federal program as intended. Given a wide range of competing budgetary and operational realities, serious concerns have arisen about successful project completion as this program entered its final year. While there is universal support for the intent of the RHCPP and its potential benefit, the current economic climate has resulted in delayed SWTAG project activities. A program extension will allow SWTAG and its members to complete the project in an efficient and thoughtful manner, as well as prepare the required sustainability plan, insure availability of the 15% cash match so we can implement the entire project appropriately, and effectively. The SWTAG stakeholders strongly support the request that the Southwest Telehealth Access Grid be given a one-year extension to June 30, 2012 to meet the RHCPP requirements that are now in place for the June 30, 2011 deadline.

Therefore, on behalf of the SWTAG, we respectfully request that our RHCPP project be given a one year extension to June 30, 2012 to have funds committed from the RHCPP and one additional carryover year for expending the funds.

We ask for your judicious and expeditious consideration of this request.

Sincerely,



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