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January 4, 2011

Ms. Sharon Gillett, Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20054

Re: Rural Health Care Pilot Program – WC Docket No. 02-60

Arkansas Telehealth Network (“ATN”)

Comments in Support of Request of Indiana Telehealth Network for Extension

ATN Request for Extension of Funding Commitment Deadline to June 30, 2012

Dear Ms. Gillett:

On behalf of the Arkansas Telehealth Network (ATN), and in response to the Wireline Competition Bureau’s (the “Bureau’s”) Public Notice dated December 6, 2010,¹ this letter is submitted to:

- Support the request of the Indiana Telehealth Network (“ITN”) for a further one year extension of the funding commitment deadline in the Commission’s Rural Health Care Pilot Program (“Pilot Program”) from June 30, 2011 to June 30, 2012.
- Request – on behalf of ATN – a similar one year extension of the funding commitment deadline to June 30, 2012, to ensure the full and complete implementation of ATN’s network.

¹ Public Notice, DA 10-2297, WC Docket 02-60 (WCB, Rel. December 6, 2010)

Comments in Support of the ITN Request

With respect to ITN's request for extension ("ITN Request"), ATN notes that ITN has demonstrated that it has made significant progress in the implementation of its project since inception, and particularly since the Bureau in February first extended the funding commitment deadline to June 30, 2011 (the "First FCL Extension").² Further, ITN has demonstrated that continued unanticipated circumstances (e.g., changes in the number of participating sites, issues relating to matching fund availability) have required additional time needed to complete key aspects of the program, involving revisions to ITN's sustainability plan, and the submission of a new RFP. Finally, ITN has demonstrated that the public interest benefits of allowing additional time for the filing of funding commitments are significant, while there are no countervailing public interest reasons to deny the extension.³ Accordingly, ATN supports ITN's request for an additional one year extension of the funding commitment deadline to June 30, 2012.

ATN's Request for a One Year Extension of the Current Funding Commitment Deadline

ATN respectfully requests a similar one year extension of the funding commitment deadline to June 30, 2012, to ensure the full and complete implementation of ATN's network. In support of ATN's request, the following is respectfully shown.

Like ITN, ATN has made significant progress in the implementation of its pilot project, and in particular ATN has taken substantial advantage of the First Extension and the extra time afforded since the passage of the original June 30, 2010 funding commitment deadline. Specifically, after grant of the First Extension, ATN (i) met all pre-conditions for its RFP; (ii) posted its initial RFP for network design services; (iii) commenced the RFP; (iv) received and evaluated proposals; and (v) selected the network design vendor. ATN's diligent efforts continued subsequent to the original June 30, 2010 deadline by having its first funding commitment letter issued on July 15, 2010 and initiating network design activities with the chosen vendor. In addition, in a related event occurring in August 2010, Arkansas was awarded a grant of more than \$102 million by NTIA in the Broadband Technology Opportunities Program (BTOP) to address critical broadband needs in health care, higher education, public safety, and research in unserved, underserved, and economically distressed areas in Arkansas.

While substantial progress has been made since the grant of the First Extension, the time required to accomplish the above steps has taken much longer than originally anticipated, due primarily to delays related to the eligibility review for the sites participating in this large statewide project. While such review and approval was eventually completed, resulting in the issuance of the above-referenced "pre-conditions", the broad scope and breadth of this project and the accompanying paperwork and USAC communications logistics caused delays outside the control of ATN. ATN has carefully reviewed the remaining steps required in this project (including but not necessarily limited to completion of network design, soliciting/awarding bids related to network equipment and

² The First Extension was granted by the Bureau in: *Rural Health Care Support Mechanism*, WC Docket No. 02-60, Order, 25 FCC Rcd 1423 (2010).

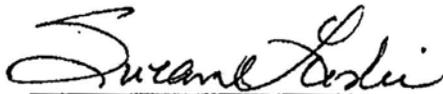
³ See ITN Request at 1-2.

connections, implementing regional hub connections for 9 regional hubs, and installation of circuits) and has determined that an additional one year extension of the funding commitment deadline – to June 30, 2012 – will ensure the fullest possible utilization of the Pilot Program funds awarded to ATN by the Commission. As an added benefit, providing an additional one year for funding commitments will allow for the careful coordination and integration of ATN's Pilot Program network with the state-wide broadband infrastructure improvements authorized under the BTOP award.

In light of the public interest benefits resulting from allowing ATN additional time for the filing of funding commitments, and given the absence of countervailing public interest reasons to deny the extension, ATN respectfully requests a one year extension of the current funding commitment deadline for the ATN pilot project to June 30, 2012.

Should any questions arise with respect to this request, please do not hesitate to contact the undersigned.

Sincerely,



Suzanne Leslie, Project Coordinator
Arkansas Telehealth Network
University of Arkansas for Medical Sciences

cc: Ernesto Beckford, Attorney Advisor, FCC
Jeffrey Rummel, Esquire, Arent Fox LLP