



CALIFORNIA  
TELEHEALTH NETWORK

January 5, 2011

Sharon Gillett, Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
Reference: Docket No. 02-60

Dear Ms. Gillett:

This letter is to request a one year extension of the deadline to apply for funding commitments from the Universal Service Administrative Company (USAC) for the California Telehealth Network Rural Health Care Pilot Program (RHCPP) to June 30, 2012. The CTN also requests a one year extension to the five year period to invoice USAC for RHCPP funds to July 2016.

To date, the California Telehealth Network RHCPP has approximately \$2.6 million in Funding Commitment Letters (FCLs) of the \$22.1 million awarded to the California Telehealth Network (CTN). We fully anticipate the remainder will be utilized in future commitments as additional agreements are executed with eligible sites most of whom were included in our initial 465A filing and several additional sites who were not on the original filing.

The CTN recently formed a 501(c)(3) nonprofit corporation and, in addition to complying with existing program requirements, is busy transitioning responsibilities to new staff at the organization as well as transitioning the required documentation for participation in the Rural Health Pilot Program. Although the CTN is anxiously awaiting tax exempt status from the IRS, we hope to have most of the transition of duties and agreements complete within the first quarter of 2011 even before tax exempt status is granted. Additionally, the founders of the California Telehealth Network continue to work diligently to meet program goals and work toward a smooth transition to the new organization.

The CTN supports recent requests that are pending for extensions from other Rural Health Care Pilot Program (RHCPP) participants. We also support the recent request from the Oregon Health Network (OHN) for unused or relinquished RHCPP funds and will consider making a similar request as demand continues to grow for CTN services at higher bandwidth levels than originally anticipated.

The commission has established a five-year deadline period for Pilot Program participants to invoice for the support for which they have received FCLs. This five-year period begins for each participant "from the date of [their] initial FCL." CTN received its initial FCL on July 22, 2010 and therefore CTN's invoicing deadline is currently July 22, 2015. Because a significant number of CTN's locations may not be able to connect into the network until as late as 2013, they may not be able to take advantage of the full five years of potential support. This means invoicing will occur for some sites well into 2016. Accordingly, we respectfully request that CTN's invoicing deadline be extended from July 2015 to July 2016.

With the help of USAC subsidies, The California Telehealth Network will connect in excess of 800 sites in rural and medically underserved communities with a medical grade broadband network designed to provide access to services that will improve clinical outcomes and reduce costs.

This extension will provide the additional time required for the CTN to efficiently and effectively accomplish these goals.

Should you have any questions or require any additional information, please contact me at (916) 734-0317.

Thank you for your consideration of this request.

Sincerely,



Eric P. Brown  
President & CEO  
California Telehealth Network

cc: CTN Board of Directors  
David Harry  
Denise Jurca