



**REGIONAL
TELEMEDICINE
NETWORK**

232 WEST 25 STREET • ERIE, PA 16544

January 24, 2011

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

RE: WC Docket No. 02-60

Dear Ms. Gillett,

On behalf of the NorthEast Healthnet (NEHN), the Regional Telemedicine Network (RTN) respectfully supports a request filed by the Indiana Telehealth Network (ITN) and the Michigan Public Health Institute (MPHI) for a waiver of Paragraph 94 of the *2007 Pilot Program Selection Order*.

It is our understanding that in addition to being granted an additional 15 months to complete its invoicing process (until December 2015), the MPHI requests that the Wireline Competition Bureau waive the five-year invoicing period for all Pilot Program participants, thereby allowing all Program participants five (5) years from the date of each funding commitment letter (FCL) received to submit invoices to USAC.

The NEHN/RTN concurs with the intent of both the MPHI and ITN requests. This extension will allow the NEHN/RTN to complete its development throughout the states of Pennsylvania and New York.

The NEHN/RTN also supports the Western New York Rural Area Health Education Center (R-AHEC) request for an extension of the FCC and USAC funding. Our commitment to the delivery of services is directly connected and dependant upon the completion of the R-AHEC network.

The NEHN/RTN believes that Paragraph 94-mandate that participants in the Rural Health Care Pilot Program complete all network build out within five years of the initial FCL is contrary to the benevolent intent of the FCC Pilot program.

With this extension, the NEHN/RTN can continue to develop and improve the much needed delivery of specialty care and education content across the states of Pennsylvania and New York, and potentially to other members of the Rural Pilot Program.

Thank you for your consideration of this matter.

Sincerely,

Handwritten signature of Philip C. Wolford in black ink.

Philip C. Wolford
Regional Telemedicine Network

Handwritten signature of Richard Ong in black ink.

Richard Ong, VP/CIO
NorthEast HealthNet