



March 22, 2012

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

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

Re: Request for One Year Extension of Funding Commitment Deadline to October 30, 2012  
Texas Health Information Network Collaboration (TxHINC)  
Rural Health Care Pilot Program WC Docket No. 02-60

Dear Mss. Dortch and Gillett:

Please accept this letter as our formal request for an extension of the June 2012 deadline for funding commitments for the **Texas Health Information Network Collaborative (TxHINC)** Rural Health Care Pilot Program (RHCPP) for a period of 120 days to October 30, 2012. Due to circumstances unique to Texas TxHINC is compelled to make this request. TxHINC understands the uniqueness of this request.

The TxHINC pilot program project is to design, develop and implement a statewide broadband telehealth network among and between Texas hospitals, community health centers, health departments, and other rural healthcare facilities and providers to improve access to care for rural Texans and to provide innovative health care services that can be delivered via broadband technologies.

The leadership of this effort is a collaboration of five Texas health organizations with CHRISTUS Health acting as the fiduciary on behalf of the collaborative. TxHINC appreciates the efforts and support of the FCC and USAC staff and coaches. With their assistance we are pleased to report that we are in the final phase of completing our 466-A package in order to obtain our funding commitment letter. We are concerned about the timing, however.

Texas is a state with unique attributes and contrasts. It is home to some of the largest cities in the nation yet it has more frontier counties than any other state; At 773 miles wide by 790 miles in length it is the second largest state, larger than the country of France. It is also the second most populace state with more than 25 million people (the state that is largest in area is 47<sup>th</sup> in total population with less than one million residents). It has more hospitals than any other state, including 77 critical access hospitals. Even though Texas has more than five hundred hospitals, it

leads the nation with the number of counties without a hospital. These features make the Pilot Program critical to improving access to care and impacting the health status for rural Texans.

During its last session the Texas legislature passed a law requiring broadband service providers to offer services at reduced rates. To qualify for these rates the circuit may not cross LATA boundaries. This law was passed after TxHINC released its RFP for broadband services and after our evaluation/selection process. TxHINC sought a legal opinion as to its eligibility as a consortium. The opinion was rendered in January 2012 in TxHINC's favor.

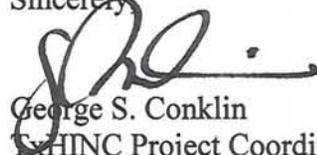
This created a conflict for TxHINC in terms of timing. We now were faced with the need to educating our participants regarding the issues and how to best move forward, and were concerned that we would have to re-bid our network or at best, reconfigure its design.

The state of Texas received its 1115 Waiver for its Medicaid program from CMS in February 2012. The Waiver means that all 3 million individuals enrolled in the state's Medicaid program will be transition into a "managed" care program anchored by regional health care networks. TxHINC is in the very early stages of discussing with the state and the local lead entities how it can provide infrastructure in support of the 1115 Waiver. There are many benefits of linking this program with our efforts, especially in leveraging FCC funds to enable the goals of coordinated and more efficient health services for this population.

These recent developments materially impact TxHINC's timeline. TxHINC is at the cusp of enabling broadband access to more than 40 rural facilities that do not have sufficient bandwidth and lack resident expertise to support the infrastructure and ongoing network management. The benefits the TxHINC network will provide far outweigh the approaching June 30 deadline.

TxHINC respectfully requests an extension of 120 days from the June 30, 2012 deadline for funding commitments under the Pilot Program. This extension will allow TxHINC to not only work with the State on its 1115 Waiver; it will allow us to better negotiate the terms of our vendor contract(s) and add at least two dozen more health care facilities to our implementation. This makes our project more effective, while demonstrating the sustainable use of broadband that provides the highest benefit to our rural facilities and their local residents in fulfillment of our responsibility to support HHS goals and objectives. TxHINC respectfully requests that our RHCPP project be granted its extension request.

Sincerely,



George S. Conklin  
TxHINC Project Coordinator and  
Senior Vice President and CIO, CHRISTUS Health

cc:

Christianna Lewis Barnhart, Telecommunications Access Policy Division, Wireline Competition Bureau  
Camelia Rogers, USAC  
Michelle Picou, USAC  
Rae Coan, USAC