



Essentia Health

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May 17, 2012

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FCC Mail Room

Commission's Secretary
Office of the Secretary
Federal Communications Commission
FCC Headquarters
9300 East Hampton Drive
Capitol Heights, MD 20743

Reference: WC Docket No. 02-60

This communication is written to provide comment from Minnesota's FCC Pilot Program entitled the *Greater Minnesota Telehealth Broadband Initiative*, (GMTBI), in response to the Wireline Competition Bureau's request for comments in funding the FCC Pilot Program.

On behalf of the GMTBI Steering Committee we would like to provide the following comments for consideration by the FCC.

The GMTBI has been a very successful project participant and has more end points, 133, than originally anticipated and included in our original proposal for funding.

The majority of 133 sites are starting in phase III, which will be installed in the summer of 2012. The summer or early fall will be the beginning of the three-year funding period.

Due to unanticipated success and participation, the original request was underestimated and will result in an insufficient allocation of FCC funds requested. It is projected that the allocated funding for Minnesota will be exhausted within two years of the start of their participation.

Recommendation: The GMTBI proposes that funds from other sites that did not need the funding or complete their project be reallocated to the GMTBI.

GMTBI has actively participated in the project since the very beginning. But even with an active committee of participants from five networks, the work was unable to be accomplished and evaluated within the time frame allowed. Phase III will bring us to the June 30th 2012 deadline. No allowable funding mechanism from FCC for project administration has been one of Minnesota's biggest obstacles. We believe we would have a more successful program and even a greater level of participation with a stronger administrative program. Minnesota has accomplished the pilot projects requirements, to date, using strictly volunteers.

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The FCC pilot project funding received has already resulted in increased activity and utilization of technology since the program's inception in Phase I.

Examples include:

- Six Southwest MN hospitals initiated Electronic Medical Records (EMR)
- Essentia Health in Northeast MN started Telehealth applications in five hospitals and clinics
- Continuing Medical Education was started in several Southwest and Northwest MN hospitals
- MetroE was initiated in Fargo, ND due to additional broadband
- The Altru medical campus in Grand Forks, ND initiated the Electronic Medical Records (EMR)
- Other telecom grant funding has been requested by network collaborators, i.e. USDA, OAT

Recommendation: In summary, the GMTBI is recommending that all its participants be provided a minimum of three years of funding for the sites committed to the pilot project. It is recommended that unused FCC funding be allocated to support this.

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Sincerely,



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Chair GMTBI Steering Committee