

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Rural Health Care Support Mechanism

Wireline Competition Bureau seeks further
comment on issues in the Rural Health Care
Reform Proceeding

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WC Docket No. 02-60

**REPLY COMMENTS OF
FRANCISCAN ALLIANCE
ILLINOIS RURAL HEALTHNET**

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Counsel for Commenters

January 3, 2014

Franciscan Alliance, Inc. and Illinois Rural HealthNet (“Commenters”) support and adopt the Comments filed by Ascension Health, et al. on the issue of eligibility of “urban clinics” and the scope of eligible entities under the Commission's Healthcare Connect Fund Order. Specifically, the clarification by the Commission that the eligible entity type “not-for-profit hospital” means the healthcare delivery locations operated by a nonprofit entity that operates a hospital facility and the associated nonprofit healthcare delivery locations, administrative offices and data centers.

BACKGROUND ON COMMENTERS

Franciscan Alliance, Inc. A trusted leader in providing faith-based, integrated health care, Franciscan Alliance brings together the latest technology, innovative procedures and the brightest, most compassionate people to serve its patients in Indiana, Illinois and Michigan. Throughout its 13 hospitals and many medical practices, it offers a number of nationally recognized Centers of Health Care Excellence.

Illinois Rural HealthNet (IRHN) is a high-speed, 3,100-mile, fiber-optic network. It is revolutionizing healthcare in rural areas by creating a fiber-optic network linking hospitals and clinics to a statewide Health IT network. The IRHN allows healthcare providers to connect to the fiber backbone and exchange vital information over a dedicated healthcare network, at speeds up to 1 Gig.

COMMENTS

Clarification by the Commission on the meaning of "not-for-profit hospital" will ensure the Healthcare Connect Fund is operated in a manner that is consistent with the structures of not-for-profit health system. Depending on the applicable state corporate laws and hospital licensing laws what constitutes a "hospital" and what health services are provided

within a "hospital" can vary. In addition, depending on reimbursement and licensing issues, not-for-profit health systems may utilize a single corporate entity or numerous entities. The Commission's Universal Service Fund programs should apply uniformly to all healthcare providers without respect to variations in state laws. The comments of Ascension Health et al. outline an eligible entity criteria that can be applied uniformly across all states and will encompass all currently funded networks.

We support the provision of Program funding to urban clinics and other ambulatory care settings, as they are an essential component of the continuum of care serving rural residents. Urban clinics, when operated by or in affiliation with a hospital facility, fall within the congressional intent of the eligible entity type "not-for-profit hospital."

We support the comments filed by Ascension Health, et al. on December 20, 2013 regarding this matter and concur with the reasoning found therein. These comments are filed on behalf of the following Commenters: Franciscan Alliance, Inc. and Illinois Rural HealthNet.

Respectfully submitted,

A handwritten signature in black ink that reads "Michael T. Batt". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Michael T. Batt

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