

February 12, 2021

Submitted Electronically Via ECFS

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Promoting Telehealth in Rural America, WC Docket No. 17-310

Dear Ms. Dortch,

INCOMPAS, the internet and competitive networks association, submits this letter in support of the letter filed by the SHLB Coalition on January 25, 2021 in this proceeding.¹ INCOMPAS asks that the Commission grant SHLB's requests to (a) extend the filing window for funding year 2021 Rural Health Care (RHC) applications by a mere two months—from April 1 to May 30, 2021; and (b) waive the rule requiring health care providers to use the RHC Telecommunications Program rates database for the next two funding years. These requested actions are necessary, timely, and in the public interest.

Extending the application deadline will help RHC applicants. The Commission set the deadline 18 months ago, at a time when it could not have imagined what RHC applicants would be facing today. Health care providers are continuing to work hard and devote time, staff, and resources to combat the COVID-19 pandemic. This includes attending to patients, administering the vaccine, and responding to variants of the coronavirus. Extending the deadline will take some of the burden off these health care providers and help ensure that they can take the necessary steps to meet the application deadline. It will also allow them to focus on applying for the new COVID-19 Telehealth Program funded by the Consolidated Appropriations Act.

INCOMPAS also supports the request to waive the requirement of using the RHC Telecommunications Program rates database. As SHLB's letter explains, requiring health care providers to use the database this year will result in them having to pay, on average, triple the out-of-pocket costs they did previously for the same bandwidths as the database appears to have some flaws that result in negative subsidies or triple out-of-pocket costs for providers. These results need to be examined comprehensively because now, during COVID-19, health care providers are facing data that does not necessarily align with congressional requirements for the RHC Telecommunications Program. Significant price hikes for health care providers to use

¹ See Letter from John Windhausen Executive Director, Schools, Health & Libraries Broadband Coalition, to Acting Chairwoman Jessica Rosenworcel, *et al.*, WC Docket No. 17-310 (filed Jan. 25, 2021).

critical telecommunications services are not in the public interest, especially as they continue to fight the global pandemic.

Respectfully submitted,

/s/ Angie Kronenberg

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