



May 14, 2021

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

**Re: Ex Parte Filing in WC Docket No. 17-310**

Dear Madam Secretary:

Pursuant to Federal Communications Commission's *ex parte* rules, I hereby submit the following summary of a meeting with FCC staff concerning the Telecommunications Program of the Rural Health Care program on May 12, 2021. I was joined in this conversation by Gina Spade, the SHLB Coalition's counsel. Attendees from the FCC included Adam Copeland, Bryan Boyle, Chas Eberle, and Kiara Ortiz with the Wireline Competition Bureau; and Don Stockdale, Eric Ralph, Glenn Woroch, Eugene Kiselev, and Stacy Jordan in the Office of Economics and Analytics.

I first explained that the SHLB Coalition is a public interest group with a diverse membership that includes several telehealth networks, rural health care providers and commercial companies. I pointed out that the SHLB Coalition is not a trade association and does not represent our members; we are guided by our mission to promote open, affordable, high-quality broadband for anchor institutions and their communities. A list of our members is available on our website ([www.shlb.org](http://www.shlb.org)). Because of our public interest mission, the SHLB Coalition's goal is similar to the FCC's goal – we both want the RHC program to operate efficiently and successfully to promote affordable connectivity for rural health care providers.

We discussed ways to reform the Telecom program to ensure that the program achieves its objectives. We acknowledged that the Commission does not wish to rely only solely upon the price data submitted by the broadband providers out of a concern that the providers may have incentives to maximize the amount of the subsidy they receive. We also explained, however, that the creation of the database of urban and rural rates, though well-intentioned, would have caused substantial rate increases for rural health care providers and did not reflect the marketplace. We expressed concern that USAC personnel are not trained to examine the differences in broadband rates, particularly since the rates can vary based on a variety of factors such as terrain, distance to a central office, technology used, contract term, and whether the service is dedicated or best efforts. We suggested that the FCC staff would be more qualified to conduct this analysis, and that the Commission's involvement in setting rates under the Communications Act would ensure that transparent legal processes are followed.

We also raised the possibility that rural health care applicants could pay a small share of the discounted rate (above the urban rate) so that they would have a greater incentive to choose the service provider with the lowest cost rate and increase the efficiency of the program. We also discussed the possibility of using the cost model developed for the Connect America Fund/Rural Digital Opportunity Fund to determine the range of rates to be used for the Telecom program. We also offered to gather more

information from our members and come back to the Commission with more specific recommendations in the near future.

Sincerely,

A handwritten signature in cursive script that reads "John Windhausen, Jr.".

John Windhausen  
Executive Director  
Schools, Health & Libraries Broadband (SHLB) Coalition  
1250 Connecticut Ave. NW Suite 700  
Washington, DC 20036  
[jwindhausen@shlb.org](mailto:jwindhausen@shlb.org)  
(202) 256-9616