



April 18, 2011

I am writing in my capacity as Executive Director of the National Organization of State Offices of Rural Health (NOSORH) to respond to the Notice of Proposed Rulemaking (NPRM), FCC-11-13, published in the **Federal Register**, Vol. 76, No. 41, Wednesday, March 2, 2011.

The National Organization of State Offices of Rural Health (NOSORH) is a membership organization representing state offices of rural health (SORHs) – the state-level agencies responsible for improving access to, and the quality of, health care for America’s rural citizens. SORHs work with rural communities to improve health care systems. In this work, SORHs promote the development and utilization of health information technology (HIT) in rural areas. This includes the effective use of broadband internet related technology. NOSORH and its member SORHs have been active in increasing participation in the Rural Health Care Program of the Universal Service Fund.

NOSORH is submitting comments to the NPRM in support of 3 key issues for broadband deployment in support of rural health:

- To assure the accessibility of essential telecommunications services, including broadband, to rural health care providers;
- To assure adequate broadband bandwidth for rural health care providers; and
- To eliminate rural/urban price differences for essential telecommunications services, including broadband, used by the rural health care system.

General Remarks

NOSORH supports reform efforts that address the inefficiencies in the High Cost program of the Universal Service Fund. NOSORH recognizes that a significant amount of USF funds have been used to compensate business practices that do not directly improve the telecommunications access of rural communities. These practices have diverted needed resources from their original targeted use. NOSORH stands in support of reforms that will reclaim resources that can be used for its original purposes, including the support of rural health care.

Response to specific NPRM sections

NOSORH has several recommendations related to Section 21 of the NPRM. That section seeks comments on the following question:

Is the National Broadband Plan recommendation of 4 Megabits per second actual download speed and 1 Megabit per second upload speed adequate for rural communities?

NOSORH recognizes the need to establish broadband availability in rural communities at speeds that are sufficient to support the operations of health service providers in those communities. In the National Broadband Plan, required actual broadband speed requirements for different types of health care providers are specified:

- Hospitals: 100 Megabits per second;
- Clinic/Large Physician Practice (5–25 physicians): 25 megabits per second
- Rural Health Center (up to 5 physicians): 10 megabits per second;
- Nursing Home: 10 megabits per second;

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- Small Primary Care Practice (2-4 physicians): 10 megabits per second; and
- Single Physician Practice: 4 megabits per second.

NOSORH believes that the 4 Megabits per second standard for rural communities is too slow to adequately support health services in most rural communities, and that this standard would fail to bridge the rural/urban divide that exists for rural health care providers. NOSORH makes the following comment, consistent with the National Broadband Plan standards:

- ***NOSORH recommends that the minimum standard for broadband speed in rural communities be consistent with the speed requirements set by the National Broadband Plan for larger physician practices – 25 Megabits per session.***

In addition, NOSORH recognizes that the National Broadband Plan - Long Term Goal 4 - seeks to assure that every American community have affordable access to at least 1 gigabit per second broadband service to anchor institutions such as schools, hospitals and government buildings. In line with this goal, NOSORH makes the following comment:

- ***NOSORH recommends that the Connect America Fund require supported broadband providers to offer hospitals and other anchor health care institutions in rural communities affordable access to at least 1 gigabit per second broadband service.***

NOSORH respects the leadership of the Federal Communications Commission on the issue of rural broadband, and appreciates the opportunity to comment on the proposed rules. NOSORH looks forward to the publication of final rules and the implementation of the Connect America Fund.



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