

September 10, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, District of Columbia 20554

RE: *Promoting Telehealth for Low-Income Consumers Notice of Inquiry, WC Docket No. 18-213*

Dear Ms. Dortch,

We, the undersigned, are a diverse – and growing – coalition of stakeholders spanning the healthcare and technology sectors who support connected health technologies. We write in support of the Federal Communications Commission’s (FCC’s) Connected Care Pilot because of the pivotal role robust broadband connectivity should play in connecting millions of rural Americans to their doctors. A consistently growing body of evidence demonstrates that connected health technologies such as “telehealth,” “mHealth,” “store and forward,” “remote patient monitoring,” and other modalities improve patient care, reduce hospitalizations, help avoid complications, improve patient engagement (particularly for the chronically ill), and increase efficiencies. These tools, which leverage patient-generated health data (PGHD), range from wireless health products, mobile medical devices, telehealth and preventive services, clinical decision support, chronic care management, and cloud-based patient portals. As fewer rural communities have easy access to in-person care, access to broadband to support a connected continuum of care is increasingly vital to America’s healthcare system, especially as more innovative remote patient monitoring (RPM) solutions become available. The FCC’s Connected Care Pilot is a meaningful opportunity to provide much-needed support to bridge the digital-health divide for rural Americans.

On July 11, 2018, FCC Commissioner Brendan Carr announced plans to establish a Connected Care Pilot Program to support the use of telehealth and RPM solutions for low-income and rural Americans. The program proposes a \$100 million to provide support to connected-care capabilities that will benefit low-income patients, including veterans who receive cost-free medical care and those Americans who are eligible for Medicaid. Additionally, the program proposal outlines controls to help measure and verify the benefits, costs, and savings resulting from connected care deployment schemes.

With approximately 133 million Americans suffering from some form of chronic illness, the majority of whom live in rural areas, our healthcare system is in dire need of an upgrade. The issue is complicated further by the fact that Americans with chronic conditions in rural communities can be hundreds of miles away from the nearest healthcare facility. However, connected health technologies offer the ability to bridge these gaps and provide needed disease prevention and treatment to America's most vulnerable rural citizens – as long as there is access to a robust broadband network to facilitate patients sharing essential data with their caregivers from their homes.

While the Commission's Rural Healthcare Fund has been an effective means for connecting eligible healthcare facilities, support for connectivity to enable telehealth and remote monitoring is lacking to the detriment of countless rural American patients in need of state-of-the-art medical care. As proposed, the Commission's Connected Care Pilot includes in its mission more broadband services enable connectivity for rural patients and healthcare facilities. This focus can make major inroads into solving the broadband-healthcare problem.

We encourage the Commission to ensure that its pilot provides program participants with the ability to utilize the diversity of connected-health innovations available today through outcome-driven requirements. Further, given the impact the Commission's Connected Care Pilot's results will have on policymakers' considerations regarding the efficacy of connected health programs and systems, we urge the Commission to ensure that selected pilot participants are well-positioned to demonstrate the value of remote monitoring.

While the Commission's Connected Care Pilot will be game-changing for many vulnerable Americans, we believe its policies will further stand as a leading global example on how pro-innovation government policies and programs can advance technology-driven healthcare improvements for citizens despite geographic adversity.

We thank the FCC in advance for its time and consideration of our views. We look forward to working with its staff throughout this process.

Sincerely,

Alivacor

American Academy of Neurology

Andaman7

Baxter Corporation

Catalytic Health Partners

Connected Health Initiative

InTouch Health

Life365

LifeWIRE

Medical Society of Northern Virginia

Medici

Microsoft

National Association of ACOs

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