The Honorable William Kennard, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

RE: CC Docket Nos. 97-21 and 96-45

Dear Mr. Chairman:

As an active telemedicine provider, NARBHA is extremely concerned about the proposed reorganization of the Rural Health Care Corporation, Schools and Libraries Corporation (SLC), and Universal Service Administrative Company (USAC) into one entity. On April 17, 1998, I also wrote you expressing our concern about this and other issues related to the Universal Service fund. We continue to believe that rural health care organizations need equal representation on the proposed consolidated organization. With only one representative expressing the interests of rural health care organizations on an eighteen member board, our concerns cannot adequately be addressed.

NARBHA provides telemedicine (behavioral health) services to 12 communities in northern Arizona (Flagstaff-2 sites, Winslow, Holbrook, Show Low, St. Johns, Springerville, Page, Prescott, Cottonwood, Kingman, and Lake Havasu City). In addition, we have a connection to the Arizona State Hospital in Phoenix. Our system is used daily to deliver psychiatric services to clients and families, and allow staff to participate in case planning sessions, attend training and administrative meetings without having to travel. More than 1,000 client sessions have been conducted over our system and more than 3,300 hours of staff travel have been saved in the last 18 months of operation. Staff and client acceptance of videoconferencing as a delivery method for behavioral health services has been overwhelmingly positive and our use of the system continues to increase monthly.

The difficult part of maintaining the system is the cost of the T1 lines. We have attempted to make these lines more cost effective by using a portion of the bandwidth for voice and data transmission between these locations. Nevertheless, the cost of the T1 lines is $272,000 annually and we have looked towards the Universal Service Fund to help reduce line costs.
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We want the Universal Service Fund to be successful and believe that in order to have our interests and those of other rural health care providers adequately addressed, that additional representation must be added to the new Board. We urge you to add a minimum of two additional board members with health care expertise to the proposed Board.

Thank you again for consideration of these issues. We invite you to visit our program at any time and see first hand how telemedicine is helping improve access to behavioral health care for residents of northern Arizona.

Sincerely,

Susan Morley, MSW
Director of Human Resources