



December 3, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

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

Madam Secretary:

On Tuesday, November 26, 2019, Jeff Mitchell (with the law firm of Fletcher, Heald & Hildreth, on behalf of the SHLB Coalition) and the undersigned met with Preston Wise of the FCC Chairman's office to discuss the SHLB Coalition's Petition for Reconsideration and Clarification filed in the above-captioned proceeding. We expressed the following views:

- Rural Health Care consortia that participate in the Healthcare Connect Fund are likely to bear the brunt of any reductions in funding if the total demand exceeds the funding cap. The SHLB Coalition believes that applicants in the Healthcare Connect Fund and the Telecommunications program should be treated equally.
- We expressed concern that USAC does not currently have the expertise to engage in rate-setting for the Telecommunications program and urged the Commission to provide USAC with additional resources to engage in this work.
- We noted that the current USAC dataset appears unable to separate certain consortia shared costs between their rural and non-rural components and so overstates the amount of funding going to non-rural locations. This could impact whether USAC can implement the Commission's new prioritization scheme. We discussed how to improve the collection of more accurate data that separates out shared costs.
- We discussed how the SHLB Coalition is working on providing a more comprehensive dataset of entities eligible to receive RHC funding to help the Commission estimate future demand.

Sincerely,

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