



February 28, 2022

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

**Re: Support for Extending the Rural Health Care Program Filing Window  
WC Dockets 02-60, 17-310**

Dear Madam Secretary:

The Schools, Health & Libraries Broadband (SHLB) Coalition hereby writes in support of the recent request by the New England Telehealth Consortium (NETC) and Connections Telehealth Consortium (CTC) to extend the 2022 Rural Health Care (RHC) program filing window from April 1, 2022, to June 1, 2022.<sup>1</sup>

SHLB Coalition is a public interest group with a diverse membership that includes large telehealth networks, rural healthcare providers, and commercial companies.<sup>2</sup> SHLB's many healthcare participants are encountering and experiencing the same staffing shortages and other COVID-19-related impacts as NETC and CTC, with similar effects on their ability to navigate the RHC application process by the April 1, 2022 deadline.

In addition to the COVID-19-related issues outlined in the NETC/CTC Request, SHLB member organizations have noted the following additional challenges:

- There continues to be an increased overall demand for telehealth driven primarily by COVID-19, which combined with the national staffing shortages noted by NETC and CTC, is impacting the ability of all health care providers to navigate the application process. Some health care systems are so overwhelmed they have only recently started through this year's application process. Indeed, the entire time that RHC applicants have been trying to adjust to the new RHC filing window they have faced unprecedented and unrelenting challenges from COVID-19.
- USAC RHC systems went down on December 11, 2021, for significant period, as a precautionary response to the recently uncovered LOG4J security vulnerability.<sup>3</sup>

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<sup>1</sup> See Letter from Jeffrey Mitchell, Counsel for NETC and CTC, to Marlene H. Dortch, Secretary, Federal Communications Commission, in WC Dockets 02-60, 17-310 (filed Feb. 22, 2022), <https://www.fcc.gov/ecfs/filing/10222131058168/>.

<sup>2</sup> SHLB Coalition is 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.

<sup>3</sup> See Federal Trade Commission, FTC warns companies to remediate Log4j security vulnerability, TECH@FTC BLOG (Jan. 4, 2022, 9:19 AM), <https://www.ftc.gov/news-events/blogs/techftc/2022/01/ftc-warns-companies-remediate-log4j-security-vulnerability>.

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This systems' downtime prevented applicants from finalizing applications before the extended holiday break, pushing them into January.

- USAC's new Form 462 entry portal was launched very recently. We appreciate that in future years the new system with its automation features will make it easier for applicants to meet the April 1 deadline, however it is not having this effect in its initial year.
- The RHC application process requires the submission of FCC Form 460 (in the RHC Healthcare Connect Fund (HCF)); submission and posting by USAC of Form 461 (request for services in the HCF) or 465 (RHC Telecom Program); followed by a minimum 28-day waiting period before service contracts can be signed. Only after all of this can applicants request RHC funding through the submission to USAC of Form 462 (HCF) or 466 (Telecom Program) by the April 1 deadline. USAC must review and approve Forms 460, 462, and 465 before applicants can take the next step in the above process. How long USAC takes to approve these forms is thus a significant variable in how long the process takes. SHLB health participants are reporting longer than expected USAC processing times for Forms 460, 462, and 465 which are also affecting their ability to meet the April 1 deadline.

Finally, SHLB agrees with NETC/CTC that USAC made significant progress in application processing in this last funding cycle, notwithstanding the later June 1 filing deadline last year.<sup>4</sup> SHLB expects USAC will be able to continue its progress notwithstanding a June 1 window this year. Generally, allowing more time for application submission will result in better quality applications with fewer errors and less need for administrative follow-up.

Respectfully submitted,



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

Cc Kris Monteith, Chief, Wireline Competition Bureau  
Adam Copeland, Associate Chief, Wireline Competition Bureau  
Jodie Griffin, Chief, Telecommunication Access Policy Division

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<sup>4</sup> See *Rural Health Care Support Mechanism; Promoting Telehealth in Rural America*, WC Docket Nos. 02-60; 17-310, Order, 36 FCC Rcd 1604 (WCB 2021) (extending the funding year 2021 April 1 RHC filing deadline to June 1).