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GENERAL MEMORANDUM 22-003

FCC Requests Comments on Proposed Rule to Revise Rural Health Care Telecommunications Program

On March 15, 2022, in the FEDERAL REGISTER, the Federal Communications Commission (FCC) published a [Proposed Rule](#) that would revise the Rural Health Care Telecommunications (Telecom) Program. The Telecom Program subsidizes the rates on telecommunications services charged to eligible rural health care providers to be reasonably comparable to rates charged in urban areas for similar services.

The FCC's proposed changes are intended to streamline the invoice process and "modify the applicability of the internal funding cap on upfront costs and multi-year commitments in the Rural Health Care Healthcare Connect Fund Program." In addition, the FCC seeks comments on how to increase the speed of funding commitments. Written comments are due April 14, 2022 and reply comments are due May 16, 2022.

The FCC seeks comments on various questions provided in the Proposed Rule. Within these questions, the FCC seeks input on tribal-specific issues. The Proposed Rule asks the following:

Due to the unique challenges that Tribal health care providers face, should Tribal health care providers receive a higher discount rate than non-Tribal providers in comparable rural areas? Would providing a higher discount rate for Tribal health care providers or considering factors other than rurality in determining discount rates comply with section 254(h)(1)(A) of the [Telecommunications Act of 1996]?

In addition, the Proposed Rule provides:

The [FCC], as part of its continuing effort to advance digital equity for all, including people of color, persons with disabilities, persons who live in rural or Tribal areas, and others who are or have been historically underserved, marginalized, or adversely affected by persistent poverty or inequality, invites comment on any equity-related considerations and benefits (if any) that may be associated with the proposals and issues discussed herein. Specifically, the [FCC] seek comment on how the proposals may promote or inhibit advances in diversity, equity, inclusion, and accessibility, as well the scope of the [FCC's] relevant legal authority.

Please let us know if we may assist you in preparing comments regarding the FCC's proposed rule on revisions to the Telecom Program.

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