

I work for a non-profit homeless housing and services agency. We have about 100 people on staff. We have 7 offices scattered across 3 counties. We use a commercial cloud based VOIP phone service. The system works well and provides connectivity across our agency. The CPUC discount allows us to afford us this system. If we were not able to use the 50% discount on this service, we would likely have to use an outdated phone system which would significantly impact our business efficiency. This program is very helpful and it should continue so as to provide non-profits the capacity to utilize the latest technology to operate effectively.

Thanks.

Jon White

--

---

Jon White, Director of Properties and Assets  
ABODE SERVICES, Allied Housing and Housing for Independent People  
Address: 481 Valley Way  
Milpitas, CA 95035  
phone # (408) 941-1851  
mobile # (510) 415-6049  
fax # (408) 941-0294  
email: [jwhite@alliedhousing.org](mailto:jwhite@alliedhousing.org) [jwhite@abodeservices.org](mailto:jwhite@abodeservices.org)

We are a nonprofit located in Napa California that serve adolescents in our community that are high risk for alcohol and substance abuse. As a nonprofit, we continue to struggle for funding to continue serving our community needs. CTF has certainly helped in our telecommunication expenses with this refund program. We appreciate any help we can get through our community and government.

Joyce Wynn  
Wolfe Center  
2310 First Street  
Napa, CA 94559

(707) 255-1855 ext. 110

Fax (707) 255-5621

Terra Nova Counseling is a 501(c)(3) mental health treatment facility located in suburban Sacramento County. With the benefit of CTF cost savings, Terra Nova is routinely able to fund at least one additional staff person to help serve our clients. We serve approximately 500 children and their families weekly, as well as about 100 adult outpatient clients and over 200 participants in our court-mandated Drinking Driver Programs. We were not aware of CTF until several years ago, and with diminishing funding, we are grateful to save on expenses so we might invest our funds in providing direct services to our clients.

The CTF is meeting a significant need and should continue.

**MARY K. STROUBE, M.S., J.D.**

*President & CEO*

Terra Nova Counseling

5750 Sunrise Blvd.

Citrus Heights, CA 95610

916.239.6310



**Tenderloin Housing Clinic**  
*Housing and Supportive Services*

126 Hyde Street  
San Francisco, Ca 94102  
Tel: 415-885-3286  
Fax: 415-771-0702  
www.thclinic.org

May 30, 2013

To Whom It May Concern,

Tenderloin Housing Clinic (THC) is a non-profit agency that serves low-income tenants in San Francisco in a variety of programs. We have been a participant of the California Teleconnect Fund (CTF) since September 15, 2010.

As a participant of the CTF, THC has seen a fifty percent (50%) annual decrease in our data and telecommunication costs, while increasing our telecommunication capacity. We have used these savings to cover our programmatic costs that help educate and house low-income, disabled and formerly homeless clients.

Without this program, THC and other public interest groups that meet the current criteria set forth by the CTF would not have the ability to bring on the advanced telecommunication technology afforded to us now. The new network has given us the ability to protect the entire organization behind a managed firewall, which protects the confidentiality of our clients. It is the backbone of our HIPAA compliance plan.

We urge the California Public Utilities Commission (CPUC) to consider the broad impact that changes in criteria and funding levels will have on the many organizations that assist the most vulnerable citizens and make San Francisco and California a better place to live.

Sincerely,

A handwritten signature in black ink, appearing to read 'Krista Gaeta', written in a cursive style.

Krista Gaeta  
Deputy Director  
(415) 885-3286 x118

Southern California Counseling Center provides access to professional, volunteer counselors at an affordable fee for individuals, couples and families. We are a nonprofit center serving the greater Los Angeles area for almost 50 years. Because of the CTF program, we have been able to update our IT system. In this economic climate, nonprofits like SCCC are bursting at the seams with people who have nowhere else to go for help. In turn, it is more difficult to raise funds when financial times are hard. This would be a terrible time to eliminate the CTF program.

Thank you for your consideration.

Gail Wilburn

Gail M. Wilburn, MA, MFT  
Executive Director  
Southern California Counseling Center  
5615 West Pico Blvd.  
Los Angeles, CA 90019  
Phone: 323-937-1344  
Fax: 323-937-3487

e-mail: [gwilburn@sccc-la.org](mailto:gwilburn@sccc-la.org)

Please visit our website at [www.sccc-la.org](http://www.sccc-la.org)

Follow us on [Facebook.com](https://www.facebook.com)

*Serving our diverse community with affordable mental health services*

RE: CTF Reply Comments Rulemaking R.13-01-010

As a participant in the CTF program, our organization feels that the program has fulfilled its purpose. The structure and administrative process of the CTF program has been more than adequate. The restatement of the CTF goals in Appendix A reaffirms the purpose of the program by focusing on equity access to state-of-the art technology in our rural area. The stated goals also ensure progress for advanced technological services by providing discounted rates to our community-based non-profit organization.

Betty Cunningham,  
Executive Director  
Shasta County Chemical People, Inc.  
Partners for a Drug-Free Community  
P. O. Box 493777  
Redding, CA 96049  
Phone: (530) 241-5958  
Fax: (530) 247-0915  
email: [drugfreeone@yahoo.com](mailto:drugfreeone@yahoo.com)  
[www.chemicalpeople.org](http://www.chemicalpeople.org)

The California Teleconnect Fund program has a positive impact on the operations of San Diego Second Chance Program. It has allowed the organization to have additional funds for our programs that would have been spent on telecommunication costs.

We strongly support the continuation of the CTF program.

Sincerely,

Stephen C. Hermes, CPA  
Chief Financial Officer  
**San Diego Second Chance Program**  
[shermes@secondchanceprogram.org](mailto:shermes@secondchanceprogram.org)  
Direct (619) 839-0956  
Fax (619) 234-7797  
[www.secondchanceprogram.org](http://www.secondchanceprogram.org)

***Visit our website at [www.secondchanceprogram.org](http://www.secondchanceprogram.org) to learn more about our programs or to make a secure online donation.***

It is the experience of Rising Sun Energy Center, a participant in the CTF program, that although the application process was fairly straight forward and navigable, and that parameters of the program suit the needs of and benefit our organization, the process of contacting service providers and securing the appropriate discounts once approved for the program has been difficult to manage. Service providers were uncooperative, uninformed and unresponsive when approached to request the discounts.

--

Eric Brizee  
Operations Manager  
Rising Sun Energy Center  
1900 Addison Street, #100  
Berkeley, CA 94704

510-665-1501 ext. 13

Hi there,

I want to thank you for giving us the opportunity to comment. I first want to say that it is not easy to determine what we are supposed to be reading. When you click on the document page there was nothing that said CTF or Teleconnect. I found it, but it was not easy. But there is also a service list which I didn't know what that was all about.

I read through the goals of CTF and I think it makes sense, but I don't know how it compares to the current goals. What are you changing? And how will it impact our organization? We are an educational community-based non-profit that runs two preschool sites. I notice that you call out K-12, but you don't mention early education. I would encourage you to add early education. It is going to grow and it is a very expensive business to provide proper ratios for families from a wide range of socio-economic backgrounds. We serve 25% low income children. CTF is a support that our organization relies on so that we can continue to serve all families. I hope that you will clarify if an organization like ours still fits your criteria.

Thanks,  
Stacey

Stacey Bartlett  
Administrative Director  
**Potrero Kids**  
[415.250.3966](tel:415.250.3966)

As a recipient of the California Teleconnect Fund (CTF), PCI has been able to upgrade our bandwidth to triple our speed which otherwise would not have been possible. By doing so, we have opened a great many doors and opportunities based on our new found ability to transfer large amounts of data files, work from the cloud and communicate electronically via VoIP. Rapid communication with field offices is crucial to us and enables us to better deploy programs to people in need and accurately monitor the results. By quickly and accurately monitoring results, compiling the data and creating reports the donors can get quick feedback showing how the money was applied and what results were achieved and tracking results not only encourages more donations but allows us to modify things for even better results. So a better/faster data connection is a key component of the efforts of many to positively affect the lives of millions of people and we are grateful to be able to pass on the gift of a better data connection in the form of aid to others.

**Konstantin (Kote) Lomidze, CPA**  
Chief Financial Officer

5151 Murphy Canyon Road, Suite 320  
San Diego, CA 92123  
P: (858) 279-9690 x304  
C: (202) 492-8956  
[www.PCIGlobal.org](http://www.PCIGlobal.org)

To Whom It May Concern:

North Coast Section, CIF has never been able to participate in the program even though our organization was granted permission. Our organization currently has phone service with Comcast, and prior to Comcast AT&T. Neither was able to direct me to the individuals who could help me with the California Teleconnect Program. Although we have been accepted in the program our organization has not received one dime of reimbursement for phone service. A big disappointment.

Sincerely,

Gil Lemmon, Commissioner of Athletics  
North Coast Section, CIF  
5 Crow Canyon Ct., Suite 209  
San Ramon, CA 94583  
Phone: 925-263-2110 x221  
Cell: 925-683-9988  
Fax: 925-263-2120

This email may contain material that is confidential work product and/or privileged, and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and delete all copies. This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 U.S.C. § 2510, et seq., and its disclosure is strictly limited to the recipient intended by the sender of this message. Thank you.

The CTF Goals as stated in Appendix A are helpful. I would like to see under item 5 where it states "community organizations" a broader umbrella to include small 501 c 3 non-profit community service organizations. Small should refer to 501 c 3 organizations that are less than a certain dollar amount, such as less than \$1,000,000. or something to that affect. The telecommunications for non-profits is critical and very expensive so any help in receiving discounted rates to smaller community service organizations is crucial.

Thank you for asking for input and I hope this program continues to grow and assist the community in need.

Cathy Jamieson, Executive Director  
New Horizons Caregivers Group

CTF for Mee Memorial Hospital has been dependable and effective for us. Because of our remote location, and the rising cost of phone lines, as well as healthcare budgetary constraints, CTF allows us to have a thorough telecom network for our hospital and clinical facilities.

## Moosen, Irene

---

**From:** Marilyn Weinger <kidsare1st@gmail.com>  
**Sent:** Wednesday, May 29, 2013 9:43 PM  
**To:** Moosen, Irene  
**Subject:** CTF Comments

To the California Public Utilities Commission;

Kids Are 1st is a 501 (c) (3) non profit community based organization. We feel rules should be added so that the utilities must honor the CTF agreement if an organization has a home based office and uses the services in the name of a principal of the organization. In our case Time Warner cable refused to honor the agreement only because the billing was in the name of our president instead of our organization. This is not fair and hopefully will be looked into and changed.

Regards:  
Marilyn Weinger  
President  
Kids Are 1st

The CTF program has provided an immeasurable benefit to the JFS organization and our ability to provide services to the community. The money we save on broadband and phone connections provides **\*real\*** outreach to people in need. From our desert homeless shelter:

“So what does a savings of \$6,600 per year mean? To someone who is homeless, with no direction or safe haven, it means the world. It means that, at an operating cost of approximately \$39 per bed for a 90-day stay, per day, two more people can find a comfortable bed, a couple of nutritious meals every day, a clean and respectful environment, access to services that help them find employment, healthcare, counseling or any services that may be needed. Most of all they get a spotless, modern facility where they aren’t “Homeless,” but rather they are “Guests,” and, when you take all these things together, that means dignity.”

Another example of a program at JFS that has benefited tremendously from the cost savings of the CTF fund is our computer lab for seniors at College Ave:

“The \$380 a month we save having the CTF discount allows us to bring in educators to provide in depth training and mental health exercises for our seniors in the computer lab. These exercises and computer training for seniors is critical not only for their mental acuity, but also for their ability to operate in the digital age.”

It is our belief that CTF is fulfilling its purpose and has helped JFS leverage our ability to impact the community in a very positive way.

**Mitchell Kohlbecker**

IT Manager

Jewish Family Service of San Diego

One Source for a Lifetime of Help

Direct Office: (858) 637-3267

Main Office: (858) 637-3000

Fax: (858) 637-3001

[mitchk@jfssd.org](mailto:mitchk@jfssd.org) • [www.jfssd.org](http://www.jfssd.org)

Turk Family Center, 8804 Balboa Ave. San Diego, CA 92123

CTF has been extremely helpful to our non-profit public benefit corporations. When combined with a VOIP telephone service provider, we have been able to realize substantial savings which can then be re-allocated to the disadvantaged populations we serve. We are very grateful for the CTF program. Thanks.

Regards,

***Phillip C. Saucedo***

Integrated Care Communities, Inc.

11751 Davis Street

Moreno Valley, CA 92557

Phone: 951.243.3837 x. 228

Fax: 951.485.2642

Email: [psaucedo@icare.bz](mailto:psaucedo@icare.bz)

We have had no problems with the program and appreciate the program!

**Debbie Boyd**

*Finance Manager*

Fresno Metro Ministry

4270 N. Blackstone Ave., #212 • Fresno, CA 93726

Ph: 559.485.1416 ext. 111 • Fax: 559.485.9109

[www.fresnetmin.org](http://www.fresnetmin.org)

Our Church and Preschool has benefited greatly from the CTF program. With our aging and declining membership and the preschool with families in lower incomes, we have found it very helpful to receive a discount on our telephone services. We look forward to our continued involvement in this program.

Denise Cerince  
First Presbyterian Church of Garden Grove

Emergency Shelter Program is pleased with the CTF Goals which include discounted rates for low-income Californians and community organizations such as ourselves.

Thank you!

--

Amanda

Amanda Yates, Executive Assistant

Emergency Shelter Program, Inc.

1180 B Street

Hayward CA 94541

(510) 581-5626 - phone

(510) 581-5628 - fax



May 31, 2013

Michael Peevey  
President  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

RE: COMMENTS- Order Instituting Rulemaking to Conduct a Comprehensive Examination of the California Teleconnect Fund (Rulemaking 13-01-010)

Dear Mr. Peevey:

The Community Health Center Network (CHCN) is grateful to have the opportunity to submit comments on the Public Utilities Commission's request for input on their comprehensive examination of the California Teleconnect Fund (CTF).

CHCN is the regional network of community health centers which collectively serve more than 170,000 patients in Alameda County. Each CHCN member is a private, non-profit organization with a mission to serve low-income and uninsured communities. Patients at the health centers are predominantly low-income, uninsured or covered by Medi-Cal. CHCN member health centers are: Asian Health Services, Axis Community Health, La Clinica, LifeLong Medical Care, Native American Health Center, Tiburcio Vasquez Health Center, Tri-City Health Center, and West Oakland Health Council. Together the health centers operate more than 70 locations, including 26 comprehensive primary care sites, dental, mental health, school health centers, WIC, and medical/behavioral health services at supportive housing sites.

#### Comment on CTF Goals

CHCN is highly supportive of all five of the CTF goals. Also, since our health centers are built around the mission to serve low-income and uninsured communities, so we see a strong alignment with the CTF goal that aims to "give priority to encouraging expanded access to state-of-the-art technologies for rural, inner-city, low-income, and disabled Californians." CHCN's members are utilizing the discounted CTF rates for high speed broadband that serves medically indigent communities to provide access to electronic medical records, health program enrollment services, among other essential services.

---

## Eligibility of Data Center Sites

Regarding new technology trends, we advocate the specific study of CTF funding for the support of a CTF eligible organization's broadband connection to a data center site where no eligible services are conducted on that site's premise. In the past several years, in healthcare and other fields there has been heightened concern of the security and accessibility of a patient or customer's confidential information. There is a major trend that an organization's most important and valuable information is being stored in data centers, not at the physical site of service.

In our case, all of our member community health centers have decided to host their electronic health record systems in secure 24-7-365 data centers for reliability and security reasons. We purchased private broadband connections to connect our data center to our clinic sites of medical care. Unfortunately, while we receive CTF funds for our sites of care, the broadband connections to our most important data center is not subsidized, since no CTF eligible services take place at that site. We request that CTF should consider funding of sites that are data centers of the CTF eligible organization.

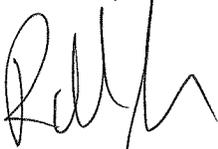
We appreciate the CPUC considering our recommendations for the CTF. On behalf of our members, we would like to thank the CPUC for their thoughtful consideration and management of such a valuable program.

We are a member of the California Primary Care Association and are in total alignment with the issues they raise in their letter to the CPUC regarding the California Teleconnect Fund.

If you have any questions about these recommendations, please contact Ralph Silber, Chief Executive Officer at 510.297.0266 [rsilber@chcnetwork.org](mailto:rsilber@chcnetwork.org) .

Thank you for your attention and consideration.

Sincerely,



Ralph Silber  
Chief Executive Officer  
Community Health Center Network



May 31, 2013

Michael Peevey  
President  
Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

RE: COMMENTS- Order Instituting Rulemaking to Conduct a Comprehensive Examination of the California Teleconnect Fund (Rulemaking 13-01-010)

Dear Mr. Peevey:

The California Primary Care Association (CPCA) respectfully submits comments on the Public Utilities Commission's request for comments on their comprehensive examination of the California Teleconnect Fund (CTF or "the Fund"). CPCA represents over 900 not-for-profit community clinics and health centers (CCHCs) in California that provide comprehensive quality health care services to low-income, uninsured, and underserved Californians. CCHCs are one of the few providers that open their doors to anyone regardless of the ability to pay. By design, CCHCs are located in medically underserved, low-income rural and urban communities and serve as the primary point of care for California's uninsured and Medi-Cal populations.

#### CTF Goals

CPCA is fully supportive of all five of the CTF goals. We strongly endorse the goal that aims to "give priority to encouraging expanded access to state-of-the-art technologies for rural, inner-city, low-income, and disabled Californians." As stated above the clinics and health centers were designed to serve our most vulnerable populations because without targeted and tailored opportunities these populations cannot fully prosper. Digital access affords disadvantaged communities with untold possibility. The last goal further reinforces access by "providing discounted rates to qualifying schools, maintaining kindergarten or any of the grades 1 to 12, inclusive of community colleges, public universities, libraries, hospitals, health clinics and community organizations." All of the institutions listed serve as anchors in the community. CCHCs are not only a source of care for patients, but community centers. Many health centers, especially in rural areas, are a gathering spot for education, community, and health. Anchor institutions that serve the entire community should receive discounted rates so that their smaller budgets can be spent on other essential services and resources. CPCA's members are utilizing

the discounted CTF rates for such necessary services as operating electronic medical records and eligibility and enrollment services.

#### Services Eligible for the CTF Discount

Because technology changes so rapidly, and the needs of the community change along with those advancements, we would suggest a short and concise annual on-line survey of participants with questions focused on use and satisfaction of CTF services. The survey would be of benefit to the Commission in helping to determine trends of how CTF funds are used, planning and resource allocation. Public transparency of the results could serve to engage the public on CTF services and serve as a reminder to the public at large the value add of the Fund. In addition to the survey, we also suggest that the Commission review the technology landscape every two years to ensure that the CTF is focused on the right technologies and services, and is not prohibiting any new advancements in the field.

#### Eligibility

In light of new technology trends, CPCA recommends that CTF expand the list of eligible organizations to include data centers associated with one of the currently eligible entities. Many of the more advanced CCHCs have data centers where their electronic medical records are housed and the organization has made a business decision to have a corporate office where there are no health care services taking place. At this point in time, CTF does not allow data centers to receive the discount. Often times these business decisions are driven by the heightened concern for security of patient and customer confidential information. Many of our members have chosen to host their electronic health record systems in secure 24-7-365 data centers for reliability and security. They have then purchased private broadband connections to connect the data center to their medical sites. While they receive CTF funds for their medical sites, the broadband connections to the data center are not subsidized.

We appreciate the PUC considering our recommendations for the CTF. On behalf of our members, we would like to thank the PUC for their thoughtful consideration and management of such a valuable program.

If you have any questions about these recommendations, please contact Deputy Director of Regulatory Affairs, Andie Patterson, at [apatterson@cpca.org](mailto:apatterson@cpca.org) or (916) 440-8170. Thank you for your attention and consideration.

Sincerely,

Andie Patterson, MPP  
Deputy Director of Regulatory Affairs  
California Primary Care Association

Not sure what you are planning, but we are happy with teleconnect. It saves our organization a bundle and we're always happy to have more funds to put to direct services for our families – thanks!

**Carrie Hook**

Finance Director

49 Powell Street, 3<sup>rd</sup> floor, San Francisco, CA 94102 | p: 415-644-0504, x1102 | f: 415-644-0514 | [compass-sf.org](https://compass-sf.org)

Hi,

As Community Links International we have ualified for this program.

However, because we operate this 501(c)(3) out of a home office in order to minimize overhead we use Comcast residential internet service and, therefore, are not eligible to receive the discount.

If this policy could be changed it would be of great help to us.

Thank you,  
Jim Petkiewicz  
Founder  
Community Links International

Thank you for this opportunity to comment . . . 2 issues:

1) I originally submitted a "Certification Discounts Certification Application" on 3/25/2010 for Catholic Social Service of Sacramento, refaxed & resubmitted 3 more times, and had numerous phone calls telling me it would be handled, and someone would be in contact with me , TO NO AVAIL. I To date, I have heard nothing.

2) I submitted a similar application for my other agency, Catholic Social Service Solano around the same time, and was eventually approved. After approval, I was required to have additional conversations and submit additional paperwork and phone bills to people in Detroit (??). After doing this, the savings we've seen are minimal, if any.

I don't think this concept is working, and I've all but given-up. Perhaps that's the reason for this study.

I wish you the best of luck fixing it, as there are many, small non-profits whose sustainability depends on lower phone bills.

Best regards,

Kurt M. Chismark

Executive Director

Catholic Social Service Solano/Sacramento

916-452-7481, x203; 707-644-8909, x207



June 10, 2013

Mr. Michael Peevey  
President  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: RESPONSE TO THE ORDER INSTITUTING RULEMAKING TO CONDUCT A COMPREHENSIVE  
EXAMINATION OF THE CALIFORNIA TELECONNECT FUND

Dear Chairman Peevey:

This letter is a response to the Order Instituting Rulemaking to conduct a comprehensive examination of the California Teleconnect Fund.

### **Summary**

The California Teleconnect Fund (CTF) provides a 50% discount on a menu of communications services to qualifying schools, libraries, government and hospital district-owned healthcare facilities, community colleges, the California Telehealth Network, and community-based organizations in California. The California Telehealth Network currently utilizes CTF in conjunction with the Federal Communications Commission Rural Health Care Pilot Program (RHCPP) broadband subsidy and California Emerging Technology Fund (CETF) matching funds to provide affordable, reliable and secure broadband services to safety net health care provider sites that qualify for the RHCPP. With the benefit of CETF and CTF support since the announcement of the FCC RHCPP award in November 2007, CTN has been able to fully encumber \$22.1 million in RHCPP funding for California health care providers in rural and medically underserved communities. Today over 700 health care provider locations have access to the CTN broadband network which is the largest FCC RHCPP funded statewide telehealth network in the United States. Based on CTN's experience working with California's telehealth consortium of health care providers over the past four years, CTN respectfully offers the following comments and recommendations.

**Recommendation #1: CTN recommends CTF allow eligible FCC Healthcare Connect Fund (HCF) locations to receive a 50% discount on the 35% HCF match funding requirement.** CTN currently receives an 85% subsidy for broadband services provided to FCC RHCPP eligible locations. The California Emerging Technology Fund (CETF) provides 15% in matching funds for this program while CTF provides a 7.5% discount on monthly recurring expenses for broadband services provided to CTN RHCPP sites. FCC, CETF and CTF combined support enabled CTN to

fully encumber the \$22.1 million FCC RHCPP award and offer broadband services to eligible health care providers at very compelling rates (as little as \$62.50 per month for 1.5 mbps or “T1” service). CTF support for CTN sites is more important than ever as previously available CETF matching funds are no longer available to support the recently announced FCC broadband subsidy program called the Healthcare Connect Fund (HCF). The HCF will subsidize 65% of the cost to provide broadband services to eligible health care providers in rural and medically underserved communities. Similar to the RHCPP, eligible health care providers include Federally Qualified Health Centers, Native American health facilities, Critical Access Hospitals, public health care clinics and hospitals, rural and community clinics. Without CETF match funding for this program, CTN proposes to utilize CTF discount to cover half of the 35% HCF match requirement, to avoid passing through the 35% HCF match requirement to each participating site. CTN believes without the CTF match assistance, HCF adoption rates will be significantly negatively impacted based on our previous site outreach experiences under the RHCPP.

**Recommendation #2: CTN recommends that CTF align eligibility requirements and the list of reimbursable services and equipment to match the guidelines of the FCC’s Rural Health Care Pilot Program (RHCPP) and the FCC Healthcare Connect Fund (HCF).** The CTN’s experience with the FCC’s Rural Health Care Pilot Program (RHCPP) indicates that many health care organizations have decided to separate billing, scheduling and general patient management into separate site locations for efficiency. Administrative office buildings and data center sites are now often integral to the delivery of efficient and effective coordinated health care. In response to this trend, the FCC recently expanded site eligibility for HCF versus the RHCPP to include data centers and administrative office buildings associated with eligible health care providers. Based on CTN’s experience, this change is consistent with the growing need to support hosted and cloud based health care applications like electronic health records which are hosted or networked through locations that are not directly delivering care. By aligning eligibility and reimbursable services requirements, CTF would simplify and reduce the administrative burden of implementation among CTN safety net health care provider locations.

**Recommendation #3: CTN recommends the following refinements to the CTF application process:**

**Section 6 – Non Profit Community-Based Organizations (healthcare)**

The current application process asks “Is this organization located in a rural area? If yes please attach a description of that area.”

**Response**

CTN suggests that a description of the location area could be made less vague by requesting a Census Tract # and/or Rural Urban Commuting Area (RUCA) code.

**Section 7 – Government Owned and Operated Hospitals and Health Clinics**

The current application process requires “Letter stating that this facility is owned, operated, and maintained by government employees.”

**Response**

CTN suggests this requirement could more efficiently be fulfilled using the State of California's Automated Licensing Information and Report Tracking System (ALIRTS) which contains license and utilization data information of healthcare facilities in California. (Link to that site: <http://www.alirts.oshpd.ca.gov/default.aspx>)

**Section 7 – Government Owned and Operated Hospitals and Health Clinics**

The current application process requires: "Copy of the clinic or hospital's directory showing the name and title of the person signing the letter."

**Response**

CTN suggests providing a directory with the signatory's name and title is redundant to the requirement in the signature box, restated here for convenience: *"I ..... declare under penalty of perjury under the laws of the State of California that I am authorized to act on behalf of the above-named institution, that the above statements are true and accurate to the best of my knowledge and belief, that the validity of such statements are subject to audit at any time by the State of California, and that the subscribed discounted communications services will not be sold, resold, lease, transferred, shared with any other non-qualifying entity or person, used for personal purpose, or used to purposes other than the intended goals of the California Teleconnect Fund to bridge the digital divide."*

CTN offers these comments to CTF and looks forward to continued collaboration utilizing broadband technology to improve access to health care targeting medically underserved and rural Californians.

Respectfully Submitted,



Eric Brown  
President and CEO  
California Telehealth Network

Hello,

The Boys & Girls Club of Whittier provides essential after school and summer programs for nearly 2000 children in the Whittier area. Program fees are kept extremely low ( ie. \$2 per day this summer.) We raise funds from every possible source to provide programs in academic success, character and leadership, and fitness and health.

The funds awarded through the CA Teleconnect Fund has been an enormous help in keeping our administrative costs down. We have been able to use those previously spent funds on telecommunications directly on programs for our children. It has been a huge help and I would be happy to discuss those benefits at any time. Thank you.

Samantha

I would like to encourage the State of California to continue funding this much needed program for most of the non-profits in the State. It would be a shame for organizations to have to consider reducing the number of phone lines, or limiting calls in order to keep expenses (specifically phone bills) in line and on budget. Fewer phone lines will mean that participants may have a more difficult time getting through to us to receive services. If phone calls are limited, NPO's may also not be able to do as good a job securing additional resources for participants. If nothing else I would suggest a partnership or at least a grant from First 5 for those of us organizations that are assisting that demographic.

Kirk W. Bauer

CEO

Assure Pregnancy Clinic

909.621.4800

*"Choose with Confidence"*

[www.assurelife.org](http://www.assurelife.org)

[www.assurepregnancy.org](http://www.assurepregnancy.org)

The program is working exceptionally well for our community. Our community population is elderly retirement community and have over 350 residents. Many of them have obtained CTF program services with the assistance of our own clinic department. The staff in this area assist's them in filling out applications and obtaining the equipment.

Regards,

Yolanda Magaña  
Director of Operations  
Air Force Village West  
17050 Arnold Drive  
Riverside, CA 92518  
(951) 697-2000