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ADVANCED TECHNOLOGY &
INTERNATIONAL HEALTH

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October 26, 2000

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Ultra-Wideband (ET Docket 98-153)

Dear Ms. Salas:

During my 26 years of service in the Armed Forces, I was involved with bringing telehealth-related technologies and applications in order to improve the quality of health care to those in the Armed Forces. Currently, I am writing on behalf of Rush-Presbyterian-St. Luke's Medical Center and its affiliated community hospitals and clinics throughout the Chicago metropolitan area in support of Ultra-Wideband (UWB) which has the potential to dramatically expand current telemedicine capacity. Our institution is integrally involved in the development of telehealth-related technologies and applications to establish new ways of increasing access to medical services in remote and/or underserved areas.

As we migrate various applications to an Internet / Intranet environment, we are aware of the tremendous potential for high-bandwidth wireless technologies which offer the growing Telehealth field the capability of transferring very large data files between users across short distances. Ultra-wideband offers low cost, high speed wireless connectivity for LANs in the critical first or last feet within our facilities. Ultra-wideband would enable our institutions to avoid costly and disruptive interior wiring projects and allow our clinicians to use a variety of monitors, PDAs, laptops and other devices in a highly mobile environment.

Increasingly, we are looking for ways to communicate electronic patient medical records – including high resolution images – among wireless LAN users within and/or among our facilities and partners to facilitate medical specialty consults, second opinions, the transmission of critical data to and from emergency units, and to provide decision support at the point of care where it is especially vital.

Ultra-wideband will greatly enhance our ability to develop “e-Health” applications, helping to improve both clinical performance and administrative efficiency – both of which as you know are high priorities of state and federal health agencies. We believe that through improved charting and by bringing knowledge sources and medical databases via Internet connectivity through wireless LANs to the bedside, we should be able to reduce medical

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errors, a national issue highlighted in the Institute of Medicine's recent report entitled "To Err is Human: Building a Better Health System". In addition, secure, wireless connectivity to our LAN will also help us ensure safe, reliable, and accurate transmission of patient care records and other sensitive data required by the administrative simplification provisions of the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA).

In short, we are excited about the prospects for UWB, and would look forward to working to help develop and implement useful clinical and administrative applications for our health care institutions, the thousands of patients we serve, and the nation.

We hope that the Federal Communications Commission will favorably view the possibilities of UWB for healthcare in its rule making activities. Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Russ Zajtchuk". The signature is fluid and cursive, with a prominent initial "R" and a trailing flourish.

Russ Zajtchuk, M.D.
Vice President
Advanced Technology and International Health
Professor of Cardiovascular Surgery
Brigadier General (Retired)