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October 24, 2000

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

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

Dear Ms. Salas:

I am writing on behalf of the Association of Telehealth Service Providers (ATSP) regarding the FCC's Notice of Proposed Rulemaking concerning Ultra-wideband (UWB) radio transmission. The Association 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 Internet/Intranet environments, 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, highspeed wireless connectivity for LANs in the critical first or last feet within facilities. UWB would enable 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 institutions 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.

UWB will greatly enhance the ability to develop “e-Health” applications, helping to improve clinical performance and administrative efficiency – both of which, as you know, are of extreme importance to 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, medical errors can be reduced, a national issue highlighted in the Institute of Medicine's recent report titled *“To Err is Human: Building a Better Health System”*. In addition, secure, wireless connectivity to our LAN will also 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 and Portability and Accountability Act (HIPAA) of 1996.

In short, the Association of Telehealth Service Providers is excited about the prospects for UWB. We look forward to assisting with the development and implementation of useful clinical and administrative applications for our health care institutions, the thousands of patients we serve and the nation.

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Thank you for your favorable review of my comments. I hope that the Federal Communications Commission will view the potential of UWB in providing improved quality and access to health care in its rule-making activities.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. A. Perednia', with a long horizontal flourish extending to the right.

Douglas A. Perednia
President

DP/dmc

Cc: Neal Neuberger