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December 3, 2009

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:  ) WC Docket No. 02-60
International Comparison and Consumer Survey ) GN Docket No. 09-47
Requirements in the Broadband Data Improvement Act
A National Broadband Plan for Our Future
Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act

NBP Public Notice # 17

COMMENTS OF THE NATIONAL ASSOCIATION OF STATE EMERGENCY MEDICAL SERVICES OFFICIALS - NBP PUBLIC NOTICE #17

The National Association of State Emergency Medical Services Officials (NASEMSO) is submitting an addendum to its Comments filed earlier in response to the Federal Communications Commission’s (“FCC” or “Commission”) November 12, 2009 Public Notice (“Notice”) in the above-referenced proceeding.\(^1\) As part of the Notice, the FCC seeks comment on issues related to broadband deployment for public safety in rural and tribal areas and broadband and it is on those that these comments focus (NBP Public Notice # 17).

6. Universal Service Rural Health Care Support Mechanism and Rural Health Care Pilot Program.

In our earlier filing on NBP Public Notice #17, we established the need for emergency medical service (EMS) broadband communications, and demonstrated an EMS role not only in emergency response but in community primary care through community paramedicine programs. We also established that this need is particularly acute in rural settings. In these capacities, EMS systems and agencies should be eligible for Universal Service and Rural Health Care Pilot Program support. “Emergency medical services facilities” in both programs are now listed as non-eligible. This should be rectified.

Respectfully Submitted,

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