

ALA American Library Association

May 11, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Secretary Dortch:

On April 23, 2015, Larra Clark, Deputy Director, Office for Information Technology Policy (OITP) of the American Library Association (ALA), and Marijke Visser, Associate Director, OITP, met with Trent Harkrader, Jonathan Lechter, Ryan Palmer, and Regina Brown of the Wireline Competition Bureau; Eric Feigenbaum, Director of Outreach & Strategy, Office of Media Relations; Jonathan Chambers, Chief of the Office of Strategic Planning and Policy Analysis; Gigi Sohn, Counselor to Chairman Tom Wheeler; and Rosita Lopez, intern with Ms. Sohn. The following topics were discussed:

Several Commissioners have signaled the need to reform the Lifeline program for the Broadband Era and to address the “homework gap” facing millions of children and families without home internet access. ALA has supported, and continues to support, the transition of Universal Service Fund programs from telephony to broadband and has documented how libraries are to ensuring access, adoption, and successful use of broadband-enabled resources and services.¹

While the forthcoming Lifeline reform will necessarily address a wide variety of issues related to transitioning to support for broadband for low-income consumers, ALA raised the question as to what role the Commission might take in addressing broadband adoption and how America’s libraries can support this effort. Libraries play a key role in supporting broadband adoption in communities across the country, including rural, suburban, urban, and tribal. Additionally, libraries serve as a vital bridge between access to broadband and meaningful use of it, particularly for low-income populations and other groups facing significant barriers to successfully using broadband enabled services.

¹ See for example ALA comments on the Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, FCC 11-13, released February 9, 2011. Available at <http://apps.fcc.gov/ecfs/document/view?id=7021239757>. See also ALA comments on the Further Notice of Proposed Rulemaking, FCC 12-11, released February 6, 2012. Available at <http://apps.fcc.gov/ecfs/document/view?id=7021239757>.

ALA raised four specific points on the ways libraries advance formal and informal education and learning. First, they support traditional K-12 students. Second, libraries are critical for nontraditional students such as homeschooled students and those pursuing a GED. Third, libraries foster home broadband use and can be part of a support network for students and their families as they gain confidence going online. And fourth, library services are increasing online and can be accessed with a home broadband connection. Most libraries, for instance, provide online tutoring or homework help that can be accessed when the library building is closed. ALA raised questions regarding the “homework gap” and *strongly* encouraged FCC officials to also consider the needs of those Lifeline recipients who do not have school-age children but are equally at risk for being bypassed by digital opportunity.²

ALA also raised a concern that as the Commission considers questions related to service, it not inadvertently create a system where Lifeline recipients do not have access to the same level and quality of service that the general public has. ALA encouraged the Commission to use its newly adopted broadband definition of 25 Mbps download and 3 Mbps upload as the minimal level of service within the Lifeline program. We also discussed questions of eligibility and methods of verification for Lifeline applicants.

As the Commission revisits the Lifeline program to determine how it should be structured to fulfill the 21st century needs of program participants, ALA respectfully suggests the Commission consider seeking comment on additional issues related to broadband adoption and use among low-income populations. These are challenging issues, and the public record should contribute to better understanding all the different ways libraries can address the educational needs of K12 students, as well as increase access to and use of broadband and digital resources for Lifeline recipients overall. For example:

Addressing the homework gap

- With “one-to-one” device programs and other digital initiatives, schools are seeking to better support out-of-school learning for K12 students who do not have broadband at home, and the Commission should seek comment about the role of libraries in connecting and supporting K12 students (both traditional and nontraditional) to the internet for educational purposes, as well. What are the opportunities and challenges of reaching target populations?
- To the extent that the Commission considers providing WiFi hotspots and support to K12 students, how could such a program be made available through libraries?
- What special or additional considerations would libraries need to be able to provide access to K12 students and their families?
- What other ways could libraries help close the homework gap?
- How should the Commission address challenges for K12 students without home broadband living on tribal lands?

² See for *Public Libraries & Digital Inclusion* for additional information related to libraries and digital inclusion efforts. Available at <http://digitalinclusion.umd.edu/sites/default/files/DigitalInclusionIssueBrief2014.pdf>. See also *Digital Literacy, Libraries, and Public Policy*, January 2013. Available at http://www.districtdispatch.org/wp-content/uploads/2013/01/2012_OITP_digilitreport_1_22_13.pdf.

Addressing additional challenges for low-income populations

- Because Lifeline is for *all* eligible low-income populations, the program must meet the needs of those recipients who do not have K12 children. We recognize the unique role libraries have in reaching these populations and seek comment on how best to utilize libraries to address barriers to home broadband adoption and use. One in five people without home broadband access, for instance, have relied on their public libraries for internet access.³
- Libraries provide broadband-enabled services to all residents in their communities, and the Commission should seek input on how such services could be augmented or otherwise adjusted to specifically serve Lifeline recipients.
- To the extent that the Commission considers a WiFi hotspot lending program for K12 students, are there ways such a program could be offered through libraries to Lifeline recipients who do not have school-aged children?
- Are there things the Commission could do to encourage foundations, community-oriented groups or other government agencies to work with libraries to support digital literacy as well as and access and use of relevant online resources and services to address these barriers to broadband adoption? Further, the Commission should seek comment on how to best leverage existing community resources to meet Lifeline goals most efficiently and effectively.
- How could the Commission support the broadest range of broadband options for Lifeline applicants, such as including new classes of providers (e.g., non-profit or government broadband) in the program?
- Given that broadband adoption on tribal lands is significantly behind that on non-tribal lands, what special consideration or actions should the Commission take to address this severe access gap? What role could tribal libraries play in supporting broadband adoption among Lifeline recipients on tribal lands? What kinds of support should the Commission provide these libraries that work with Lifeline recipients on tribal lands?

If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully submitted,



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³ See *Exploring the Digital Nation: Computer and Internet Use at Home*. Prepared by the Economics and Statistics Administration and the National Telecommunications and Information Administration, U.S. Department of Commerce, November 2011. Available at http://www.ntia.doc.gov/files/ntia/publications/exploring_the_digital_nation_computer_and_internet_use_at_home_11_092011.pdf.