

**Before the
Federal Communications Commission
Washington, DC 20054**

In the Matter of:

Establishing the Digital Opportunity Data Collection)	WC Docket No. 19-195
)	
)	
Modernizing the FCC Form 477 Data Program)	WC Docket No. 11-10
)	

Reply Comments of the American Library Association

The American Library Association (ALA) is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. ALA represents the nation’s 117,000 libraries, which includes 16,557 public libraries. We appreciate the opportunity to submit these brief reply comments on the above referenced proceeding.

Comments filed by the Schools, Health & Libraries Broadband (SHLB)¹ Coalition request the Commission to collect broadband mapping data—and ultimately publish the results—for community anchor institutions (CAIs). We very much agree with SHLB’s comments. The coalition has well documented the importance of community anchors but we share its concerns that the Notice appears to minimize this importance.

We note that comments from ADTRAN also support the broadband mapping of community anchors.² It notes that fiber to CAIs, like libraries, can make it “more efficient to provide

¹ Schools, Health & Libraries Broadband Coalition comments filed September 8, 2020 (<https://www.fcc.gov/ecfs/filing/109090789521018>).

² ADTRAN comments filed on September 9, 2020 (<https://ecfsapi.fcc.gov/file/10909879707566/ADTRAN%20Broadband%20Opportunity%20Data%20Collection%20Comments%209-9-20.pdf>).

broadband services to nearby homes and businesses.”³ Related to this, it states that having broadband mapping data on CAIs can help the Commission better target its universal service funding to where it is most needed. Such targeting for our libraries and schools could include possible allocation of some E-rate funds based on mapping data documenting insufficient broadband connectivity.

Our public libraries are the quintessential community anchor institution because they serve everyone in their respective communities. ALA has worked for many years advocating for adequate and affordable broadband connectivity for our public libraries.⁴ The Commission’s inclusion of mapping library connectivity will give us the data we need to better focus our advocacy in this area⁵ and it will give the public library community itself a more accurate picture of how libraries fare from a nationwide perspective.

We hope the Commission will see the substantial benefits of mapping the broadband connectivity of community anchor institutions and as part of this proceeding it will act to do so. Thank you for reviewing our Reply Comments.

Respectfully submitted,

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³ ADTRAN, page 4.

⁴ For example, see the 2007 ALA filing with the Commission on public library needs for more affordable broadband, GN Docket No. 07-45 (<https://ecfsapi.fcc.gov/file/6519411688.pdf>).

⁵ For many years ALA annually collected data on public library broadband connectivity, speed, costs, etc. Unfortunately there is no longer funding available for this and 2014 was the last time such data were collected (<http://www.ala.org/tools/research/digitalinclusion>).