

ALA American Library Association

March 5, 2010

Mr. Blair Levin, Executive Director
Omnibus Broadband Initiative
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Mr. Levin,

The American Library Association (ALA) submits for the record the following supplemental comments related to the National Broadband Plan (NBP) and the need for a national coordinating “entity” to support broadband services to all anchor institutions. To best serve the American public, a “rising tide must raise all boats” making a coordinating function at the national level necessary to assure that equitable and affordable broadband access is available through all types of interconnected “anchor institutions” and the networks that serve them.

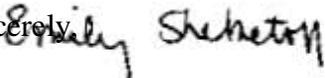
ALA has signed onto the Schools, Healthcare and Libraries Broadband (SHLB) Coalition’s comments proposing the creation of a “UCAN” entity – a Unified Community Anchor Network. The following comments attempt to expand the vision of such a coordinating function. For the purpose of these comments, ALA refers to a “coordinating entity” rather than the acronym “UCAN”, in part because the FCC has received at least two filings using the acronym “UCAN” – only one filing being endorsed by members of the SHLB Coalition.

- The mission of any coordinating function or entity must be a commitment to assure that the American public is served by all types of anchor institutions with advanced broadband services in an affordable and equitable manner;
- A guiding principle of a coordinating entity must mirror the public policy inherent to our Nation’s universal service principles: ALL benefit when the maximum number of anchor institutions and consumers are connected to broadband;
- To best serve the American public, a coordinating entity must be committed to promoting and supporting the diverse needs of ALL types of anchor institutions while recognizing that “one size will not fit all”;
- The needs of libraries for robust broadband, like the needs of all anchor institutions, includes the capacities, now and into the future, to serve multiple simultaneous users with access to the full range of bandwidth-intensive applications – on-site and remotely;

- Coordination and promotion of a “network of networks” must also include local governments and public safety organizations as anchor institutions;
- A coordinating entity must be committed to build upon existing networks already serving anchor institutions with a recognition that these networks are extremely diverse and function with different types of funding streams, ownership and partnerships;
- While some networks may be “public”, other options should include public-private partnerships and new models for collaboration among stakeholders;
- As resources may be available, this entity should give priority to public, private or public-private partnerships that will serve anchor institutions serving communities with little or no broadband access;
- Examples of “anchor institutions” include:
 - Libraries of all types, especially public libraries not part of other educational or anchor institutions;
 - Institutions providing K-12 and higher education, including community colleges and the libraries in these educational institutions;
 - Institutions providing public services to lifelong learners, early childhood education and people of all ages;
 - Health care institutions, with an emphasis on local public health care clinics, especially in rural areas; and
 - Local and state governments and public safety organizations.
- **All** types of anchor institutions must be directly represented and involved in the planning, governance and functioning of a coordinating entity; no one subset of anchor institutions should be responsible for governance and development of such an entity; all must be “at the table”;
- Numerous models should be considered for governance and operation – including, but not limited to, the configuration of the USAC Board and its various committees;
- One function of a coordinating entity should be to encourage and seek legislative or regulatory policy changes, as necessary, to leverage the different types of funding available to anchor institutions and community networks; the ability to create “new mixes” of funding should be encouraged;
- Existing USF support mechanisms for the ongoing costs of connectivity for public libraries and K-12 schools must be maintained until pricing of these monthly services becomes truly affordable; E-rate discounts should not be diverted to non-telecommunications services or functions;
- Anchor institutions participating in coordinated initiatives of this entity, must comply with network neutrality rules; and,
- Aggregation of demand must be inherent to any coordinating initiatives; anchor institutions must have the regulatory and legislative flexibility to develop new forms of collaboration to meet community needs.

As the oldest and largest library association in the world, ALA looks forward to partnering with all those working to realize the vision of broadband access for all Americans while assuring that deployment moves forward efficiently and strategically. Our members and staff are available to discuss library and related issues with you and your staff and to participate in the FCC proceedings on the NBP.

On behalf of the over 65,000 members of ALA, the Association applauds the FCC's efforts to develop a National Broadband Plan. This is an important step in assuring that the public has access to broadband – at home, at work, in schools and colleges, in health care organizations and through other anchor institutions - including local libraries.

Sincerely, 

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