<div align="center">**Before the**
Federal Communications Commission
Washington, DC 20554</div>

In the Matter of:

	)	
Report on Rural Broadband Strategy	)	GN Docket No. 09-29
	)	
	)	

<div align="center">**COMMENTS OF THE AMERICAN LIBRARY ASSOCIATION**
IN RESPONSE TO PUBLIC NOTICE</div>

The American Library Association (ALA) is the oldest and largest library association in the world, representing more than 67,000 members. There are 16,543 public libraries across the nation. These libraries play a vital role in providing access to online resources and opportunities, especially in rural communities. Today 98.9% of public libraries provide no-fee access to the Internet. Additionally, in 73% of the nation's communities the public library is the only source for this no-fee public access; in rural areas this number rises to 82%.[i]

The ALA is pleased to submit these comments in response to the Public Notice concerning the development of a comprehensive rural broadband strategy required by section 6112 of the Food, Conservation and Energy Act of 2008 (the 2008 Farm Bill). We understand this strategy will be used to inform the forthcoming national broadband plan that the Federal Communications Commission (FCC) must develop pursuant to the American Recovery and Reinvestment Act (ARRA) of 2009. The ALA recognizes the request for comments by the FCC as a unique opportunity to address the challenges of deploying and sustaining broadband services to rural areas. We commend the FCC and the Secretary of Agriculture for bringing national attention to the connectivity needs of rural communities throughout America. Access to quality, high speed Internet bandwidth becomes increasingly important for our rural population to participate in the information-based society. Being connected is no longer an optional luxury; to compete in the 21st century it is essential.

The make-up of rural America is geographically, culturally, and economically diverse. There is not a one-size-fits-all solution to implementing and sustaining a rural broadband strategy. In designing a strategy, it is imperative the FCC focus its attention on drafting

---

[i] *Libraries Connect Communities: Public Library Funding & Technology Access Study 2007-2008.* Chicago: American Library Association, 2008, p. 37. http://www.ala.org/plinternetfunding.

policies that remain flexible and will allow local areas to implement connectivity plans that meet their unique circumstances, needs and goals. While considering today's connectivity requirements, the ARRA affords an additional opportunity to plan for long-term broadband sustainability by providing the FCC, the National Telecommunications and Information Administration (NTIA) and Rural Utilities Service (RUS) with resources to support innovative broadband proposals that will help move all regions of our nation, especially rural areas, toward a successful Internet-based future.

Recommendations

The ALA encourages the FCC to recognize and leverage the vital role that libraries are already playing in providing access to online resources in rural communities by:

- expanding library access to broadband,
- simplifying the E-rate application process, and
- building upon the existing role of libraries to create a national broadband plan that incorporates the unique needs of rural America.

In response to how specific federal agency programs and resources can best respond to rural broadband requirements and overcome current obstacles, ALA has four specific recommendations.

Develop and support the library's role as the information hub in rural communities

We urge the FCC to coordinate federal agency efforts by encouraging local governments to develop relationships with existing community organizations, such as libraries. The benefits of this approach are twofold. First, it is important that any plan reflect local communities' needs and capacities. Local organizations best understand these dynamics. Second, this approach will allow a national effort to build upon existing infrastructure in local communities. In many instances, communities' existing infrastructures can be used as a foundation for building additional broadband capacity.

Rural libraries already serve as an information hub in the community by providing no-fee public access to the Internet and training on how to take full advantage of online information and services. About one-half of all public libraries are located in rural areas. The increasing reliance on the Internet as the source for information and resources, including those critical for prosperity and successful civic participation, elevates the role of the public library in its community. The public library can leverage its role as the premier public computing center and support broadband build-out to other public and private organizations and residences. These could include rural healthcare, distance learning, employment education and training, small businesses, emergency management services and other social services.

A successful broadband strategy in any area will look to stable, long-standing institutions such as libraries to serve as the anchor tenant, acting as the hub for a fiber network thereby encouraging competition among service providers.

Recognize public libraries as an essential source of lifelong learning opportunities in rural communities

Today's worker must continually hone his or her skills to compete in the global marketplace, and libraries are a leading source of lifelong learning. For example, the Michigan eLibrary provides online resources for Michigan residents pursuing additional education or retooling their skills. These essential online resources are available to all Michigan residents from their libraries. However, these resources alone are ineffective without sufficient broadband connectivity.[ii] [iii]

Libraries provide support for job searches and career development, access to state and national e-government services, homework assistance, access to healthcare information and many other resources that are dependent on Internet access. During this economic downturn, the demand for these services has increased markedly, as chronicled on the national news and in articles that highlight the critical role local public libraries play during this these tough economic times; "They're turning to us for job assistance and business creation," said Patricia Tumulty, the director of the New Jersey Library Association. "We're helping them fill out unemployment forms online. The public sees us as a central service."[iv]

Our public libraries support the educational needs of rural Americans. Sufficient connectivity is an essential component; however, it is only the first step to access. Equally important is the support and expertise of librarians to help guide patrons as they navigate the Internet and its wealth of information resources. Studies indicate there remains a proportion of the population that has not yet become aware of the benefits of high speed broadband connectivity.[v] This segment will fall further behind their connected counterparts unless they are brought into the broadband fold. Librarians, already champions for access to information in their communities, are reaching out to vulnerable populations.

Rural libraries are in a prime position to stimulate demand for broadband access by developing and hosting community forums, exposing their patrons to the educational, economic and social gains that are available online. Those hesitant to use the Internet need support and training in a trusted environment by dedicated and knowledgeable professionals. Targeted educational forums taught by librarians can provide training on specific topics: filing for student loans, completing online job applications, tax preparation and health care information, for example.

[ii] For more information see Michigan eLibrary at: http://www.mel.org.
[iii] See also *Supporting Learners in U.S. Public Libraries.* (2009). The Public Library Funding & Technology Access Study. http://www.ala.org/ala/aboutala/offices/ors/plftas/Issues%20brief-Ed.pdf.
[iv] Richard Cowen, "Free Resources Draw Residents to Libraries," *The Record*, March 17, 2009. Accessed March 24, 2009, www.lexis.com.
[v] Horrigan, John. (2009). *Stimulating Broadband: If Obama Builds it Will They Log On?* Pew Internet & American Life Project. http://www.pewinternet.org/Reports/2009/Stimulating-Broadband-If-Obama-builds-it-will-they-log-on.aspx, accessed March 20, 2009.

The FCC should encourage the deployment of fiber to public libraries

Our public libraries, especially those in rural areas, provide a host of web-based services, all of which require increasingly robust Internet connectivity. However, public libraries in the United States are facing a broadband crisis. Web sites increasingly incorporate bandwidth-heavy features such as video, podcasts and interactive applications. According to a recent study, 57.7% of public libraries in rural communities report having Internet access speeds of 1.5 Mbps (T1) or less, while most public libraries report that a connectivity speed of 1.5 Mbps is insufficient to meet current demand.[vi] Bandwidth demands from Web 2.0 applications and services that are just emerging, or are not yet developed, indicate in the next several years our public libraries will need extremely high speed broadband connections to serve the needs of their communities.

We strongly support fiber optic cable build-out to libraries as the long-term solution for high speed broadband deployment for our public libraries, especially our rural libraries. Currently, fiber optic cable is the most viable technology available to address the Internet demands of the future. Fiber optic cables are "future-proof" in that they can transmit almost unlimited data simply by adding the electronics on either end of the cable. Rather than investing in short-term broadband technologies that are likely to be made obsolete by Internet traffic growth in just a few years, it simply makes more sense — and will be more cost-effective in the long-term — to deploy fiber optic cables directly to each rural public library. Even if they do not need the bandwidth that requires fiber now, they will in the near future.

Furthermore, fiber to the library will provide additional benefits. For example, rural public libraries can be the anchor tenant in a fiber optic network serving the greater community, which will help promote the economic growth and development of the entire rural area. The ARRA stimulus funding and other actions taken by the FCC should encourage the first-wave infrastructure build-out to essential public service entities such as libraries, schools and health clinics. These entities often serve as the only no-fee access point to the Internet or provide public services dependent upon high speed connectivity including telemedicine services. Once broadband is built out to these hubs, second-wave strategies could then focus on deployment to local small businesses and individual households.

Simplify the E-rate process

More than half of all public libraries in this country are located in rural communities and are staffed by relatively few full-time professional librarians. While these libraries do an admirable job of serving their communities with extremely limited resources, they are faced with unique challenges. Rural libraries are particularly challenged because they often lack dedicated technical support and day-to-day network management. As with all

---

[vi] *Job-seeking in U.S. Public Libraries.* (2009). Public Library Funding & Technology Access Study, http://www.ala.org/ala/aboutala/offices/ors/plftas/Issues%20brief-jobs.pdf

types of libraries, rural libraries' need for bandwidth capacity and technical support is growing at an exponential rate.

There are current federal programs in place whose purposes are to provide ongoing broadband connectivity support. For example, the E-rate program, a component of the Universal Service Fund (USF), enables our libraries to afford the ongoing telecommunication services and Internet access their patrons require. A stable, dependable source of funding like E-rate is key to continuing to deploy our country's broadband infrastructure.

As we work to ensure build-out of the broadband infrastructure with increased connectivity to rural libraries, the demands on the E-rate program for ongoing costs will inevitably increase. The ALA has repeatedly filed with the FCC on the need to simplify the E-rate application and disbursement process. The current process unfairly burdens the neediest applicants, small rural libraries, for example.[vii] A simplified E-rate application process will help ensure efficiency, accountability and transparency and make it easier for rural library applicants to take advantage of the program's benefits.

The ARRA provides the funding for the initial investment of build-out of broadbrand infrastructure. Existing federal programs, such as the E-rate program, assist with the day-to-day sustainability of that investment. Both of these tools are necessary to create the advanced broadband network envisioned by the ARRA's authors.

Looking to the future

The ARRA has created an opportunity to reach across federal agencies and state and local governments to design an inclusive national broadband plan that addresses the needs of urban, suburban, rural and tribal communities. A commitment from diverse government agencies will result in a comprehensive and sustainable strategy to bring quality high speed Internet access to communities across America. The dialog initiated through the signing of the ARRA has the potential to inform a proactive, forward-focused national broadband policy. The ALA urges the FCC to support innovative and sustainable broadband initiatives that address the needs of rural America. The ALA also urges the FCC to ensure public libraries play an essential part of any such initiative.

The library can play a pivotal role in helping rural areas achieve the connectivity levels needed for tangible economic, educational and social growth. As states develop their own plans for sustainable broadband strategy in response to ARRA stimulus funding, the ALA encourages the FCC to establish competitive broadband grants, rather than loans.

[vii] Comments of the American Library Association in Response to the Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking. Filed October, 2005 with the Federal Communications Commission. http://www.ala.org/ala/aboutala/offices/oitp/publications/officialfilings/officialfilings.cfm See also Comments of the American Library Association in Response to Notice of Inquiry. Filed November, 2008 with the Federal Communications Commission. http://www.ala.org/ala/aboutala/offices/oitp/publications/officialfilings/E-rate_Program%20Overs.pdf

Often, rural libraries are without adequate staff or financial resources necessary to secure a loan and are not likely to avail themselves of funding made possible by the ARRA.

Therefore, establishing the library as the information hub of rural communities will directly benefit the rural economy by:

- deploying local fiber networks that benefits the neediest communities. Operating as an anchor tenant, a fiber to the library initiative is indispensable to ensuring that our rural libraries can provide high-quality Internet access as the bandwidth demands increase at exponential rates. In brief, fiber gets our libraries to the future, faster.
- serving as the link between local businesses, governments, and social service organizations. The library provides no-fee access to the Internet and access to information that is most helpful to our communities.
- providing value-added services to Internet users. Today's Internet users need support services (e.g. education and training) to reap the benefits of being online.
- becoming the premier public access computing center. With the continued support of local, state and federal programs and grants, the library can offer its rich services at no fee to the community.

As essential providers of community connectivity, particularly for vulnerable populations and in rural areas, America's libraries have a great interest in the effort by the FCC to design a rural broadband strategy to help inform a comprehensive national broadband plan. As a representative of these libraries, the ALA encourages the FCC to emphasize the importance of libraries as they engage in this effort.

Thank you for considering our comments.

Respectfully submitted,

Emily Sheketoff
Executive Director
ALA Washington Office