



April 11, 2014

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

EX PARTE PRESENTATION

- Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket 12-268;
- Amendment of the Commission’s Rules with regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354;
- Revision of Part 15 of the Commission’s Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49.

Dear Mr. Chairman and Commissioners:

The American Library Association (ALA) applauds and supports the Commission’s efforts to make additional licensed *and* unlicensed spectrum available for broadband in the pending 600 MHz proceeding. Wireless internet access—including unlicensed TV white spaces (TVWS)—is increasingly important to our nation’s libraries. Robust wireless networks have the potential to increase library broadband capacity to power public access technology resources inside library buildings and to even possibly provide internet access out to communities underserved and unserved by other broadband options.

As the Commission prepares to move forward with the incentive auctions, the ALA urges the FCC to ensure a sufficient amount of unlicensed spectrum is made available in every market nationwide, including the biggest cities.

The ALA is the oldest and largest library association in the world with more than 57,000 members. The ALA advocates for policies that ensure access to electronic information resources as a means of upholding the public’s right to a free and open information society. This includes supporting a spectrum policy that balances licensed and unlicensed approaches so that the explosive growth in WiFi can be supported and leveraged for all people, including through our nation’s 100,000-plus public, K-12 school and higher education libraries.

Our nation's libraries leverage internet access and networks to empower library users and provide indispensable support for their education, employment and entrepreneurship-related needs. Over 97 percent of our public libraries already provide free WiFi service to their patrons, and these wireless connections also enable mobile computer labs in some of our smallest libraries which are used to support digital literacy training, to access government information and to complete online job applications. WiFi also supports streaming and download of increasingly rich digital collections, as well as RFID and self-checkout that ease wait times and enable library staff to focus on other patron services.

More recently, several libraries have begun participating in TVWS pilots, such as in Delta County, Colorado, where most people live in small towns or on farms spread throughout the area. The county's five public libraries, which serve about 30,000 people, are not only an important community hub for meeting and socializing, but also critical internet access sites. John Gavan, IT manager for the library, predicts that 90% of visitors to the libraries use the internet. And, when the Delta County Library in Paonia (population 1,500) closes each night, the parking lot is typically filled with people tapping into the library's WiFi.

In October 2013 the TVWS equipment was installed at the Paonia library. The library's WiFi now sends a signal down the main street, as well as to the town park. These satellite library hotspots, powered by unlicensed TV band spectrum, are proving very popular and beneficial to the community. The library is averaging 10-12 gigabytes of data transmission every day, which is expected to rise over the summer when the park is in greater use. The library system also is working to creatively expand and share connectivity. In March 2014, for example, the library district's TVWS link supported a radio station feed via the internet from a theater in town where Lake Street Dive, a rising new band, gave a concert. When the library was preparing to buy the equipment it had been lent through the pilot, the community responded. The library system raised \$4,200 from 63 donors in one month via a Kickstarter campaign to help purchase the TVWS equipment (of a total of about \$6,000) at the end of the pilot to keep the network running.

This is one example of what may be enabled through TVWS and other unlicensed spectrum, particularly in our rural communities where the connectivity needs are greatest. Already we have seen "expressions of interest" filed by the Iowa Communications Network, for instance, that would deploy a state-wide 'White Space' network to support libraries and other community anchor institutions. Likewise, the Delaware State Library and the University of Delaware are leading a project to assess the feasibility of installing TVWS hubs at every library in the state to help extend the services offered by Job Centers @ Delaware Libraries.

Making adequate amounts of unlicensed spectrum (preferably 30-40 Mhz in every media market) available below 700 MHz is necessary to help meet increasing broadband needs of libraries and the millions of people libraries serve in rural, urban and suburban communities every day.

Sincerely,



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