

ALA American Library Association

May 22, 2014

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

RE: WC Docket No. 13-184

Dear Secretary Dortch:

On May 21, 2014, Emily Sheketoff, Executive Director, ALA Washington Office, Marijke Visser, Assistant Director, ALA Office for Information Technology Policy (OITP), Larra Clark, Director, Program on Networks, OITP, and Alan Fishel, Senior Counsel, OITP met with Commissioner Michael O’Rielly and Amy Bender, Wireline Legal Advisor to the Commissioner. The following topics were discussed:

ALA introduced *The E’s of Libraries*[™] which categorize the host of library services, including those focused on education, employment and entrepreneurship as well as those that empower individuals and foster community engagement. Services such as early learning with appropriate uses of technology; online research resources and homework assistance for America’s K12 students, the 1.5 million homeschoolers and other non-traditional students; assistance in researching and applying for employment online; digital literacy skills training; small business resources; and videoconferencing for interviews are representative of the lifeline libraries provide their communities—especially for those without an alternative for internet access. These services are 100 percent dependent on broadband access. Libraries connected to scalable, high-capacity broadband are the keystone for economic development, educational achievement, and civic and social participation.

ALA proposed focusing a significant portion of the \$2 billion down payment on those libraries and schools that are furthest behind and have the most challenges in securing affordable high-capacity broadband. Only 40 percent of libraries report they have fiber connections, and the majority of libraries have speeds of 10 Mbps or less. Libraries in rural areas average eight computers and almost all provide WiFi access for patron owned devices, yet a majority report average internet speeds of 4 Mbps or less.

Designating a portion of the down payment toward building out “future-proof” technologies where high-capacity broadband is not available, ensuring it is affordable, and enabling libraries and schools to develop cost-efficient and effective networks through state-centric planning and guidance, will result in a “two-for-one” investment of these critical resources. Investments made in rural areas will increase library participation in the E-rate program; dramatically move libraries

toward the kinds of broadband capacity they need today and allow them to scale for future needs; and provide evidence for cost-effective practices that will ultimately lead to more efficient use of E-rate funds.

ALA discussed the nature of internal wiring and wireless access in libraries and proposed that the Commission also designate a portion of the \$2 billion down payment toward ensuring library LAN and WiFi networks are sufficient for both public access computers and the increasing proliferation of patron-owned devices. ALA mentioned that many libraries are moving toward cloud computing, which also will impact the type of WiFi networks libraries will have in the future. These wireless access points are very important for libraries, but ALA believes that devoting the entire \$2 billion to internal connections would disadvantage rural and small applicants that still lack high-capacity broadband “to the door.”

Finally, ALA also discussed the transition from supporting legacy services to a more broadband focused program. Because of the impact this transition is likely to have on many libraries—especially small and rural libraries—ALA strongly supports a clear phase out of voice services such that applicants have sufficient time to prepare for the transition. ALA remains concerned for areas where a “plain old telephone service” alternative is not available, reliable, or affordable.

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

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Marijke Visser".

Marijke Visser
Assistant Director, Office for Information Technology Policy
American Library Association
Washington Office