

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Deployment of Nationwide Broadband Data to) WC Docket No. 07-38
Evaluate Reasonable and Timely Deployment of)
Advanced Services to All Americans,)
Improvement of Wireless Broadband)
Subscribership Data, and Development of Data on)
Interconnected Voice over Internet Protocol
(VoIP) Subscribership

Comments of the American Library Association

The American Library Association (ALA) is the oldest and largest library association in the world, representing some 65,000 members. ALA's members include primarily school, public, academic and some special librarians, as well as trustees, publishers and friends of libraries. ALA's mission is to provide leadership for the development, promotion and improvement of library and information services and the profession of librarianship in order to enhance learning and ensure access to information for all.

ALA is pleased to submit these comments in response to the Notice of Proposed Rulemaking (NPRM) concerning the development of nationwide broadband data to evaluate reasonable and timely deployment of advanced services to all Americans. The ALA applauds the Federal Communications Commission (FCC) for asking many important questions concerning the collection of data on deployment of advanced services.

Public libraries across the country serve as gateways to information within their communities. In the digital age this role has become even more important, and access to sufficient and affordable broadband is essential for our community to serve this purpose. Since 1994, ALA has co-sponsored periodic studies of public libraries in the U.S.; one of the key data points we track is Internet connectivity. In the 2006 results, 98% of public libraries indicated that they provide public access to the Internet. However, in the same survey, 45% of public libraries indicated that they did not have sufficient bandwidth to serve patron needs at all times.¹

Libraries use their Internet connectivity for several purposes. First, library staff uses the Internet for business functions, including (in some cases) to run the online catalog, make digitized content available, and to serve patrons through email and online reference. Library patrons also use this Internet connectivity -- libraries are a locus of free, public access computing. Patrons who rely upon library connectivity to access the Internet may

¹ Bertot, J. C. et al. (2006). Public Libraries and the Internet: 2006: Study Results and Findings. Available: http://www.ala.org/ala/washoff/contactwo/oitp/2006_plInternet.pdf

not have access at home, and those who do may rely on the library's higher bandwidth to accomplish more demanding tasks such as downloading and filling out government forms. The public uses the Internet connection to access many types of information, including e-government, education, small business support and health information and research. Furthermore, libraries provide essential information literacy training that allows less tech-savvy patrons to realize online opportunities.

As the FCC considers how to define broadband, we encourage the Commission to analyze the different levels of service required for different users. The bandwidth required by a library, or even a business, exceeds that of an average household. We therefore encourage the Commission to consider splitting the tier as proposed in Section 3 of the notice. However, we encourage the commission to consider an approach whereby three tiers are defined -- for instance, we suggest 200 kbps to 1.49 mbps, 1.5 mbps and 1.5 mbps to 2.5 mbps. Several entities connect to the Internet using a T1 connection that runs at approximately 1.5 mbps. Furthermore, many implementations of DSL allow for up to 1.5 mbps. By splitting the bin in the manner above, the commission can collect more granular data that provides a truer picture of the state of connectivity.

We further encourage the commission to consider synchronous communication speeds; we feel that it is essential to collect the speeds for both download and upload. Currently, broadband is typically deployed in an asynchronous mode, with higher download speeds than upload. Libraries, in their role as providers of information, must be able to efficiently upload data to the Internet. As the amount of user-generated content and the number of interactive websites increases, the usage of the upload bandwidth will also increase. Usage of the upload bandwidth will increase greatly in public libraries that have public access computing.

We have no specific comment on automatically adjusting the speed tiers or the minimum threshold. However, we encourage the Commission to be adaptable in what defines broadband. The 200 kbps speed adopted in 2004 does not accurately reflect the speeds marketed to consumers or libraries, and new technologies and increased deployment have made faster connection speeds available. Further, usage of higher speeds in homes and libraries is increasing drastically as the usage of bandwidth intensive applications, such as e-government and online education, increases.

More refined geographic data will be beneficial to our community and to the public at large. Therefore, we applaud the Commission for exploring improved ways of gathering data and encourage the Commission to increase data collection. While gathering data on subscription helps one to understand what is currently purchased by subscribers, it does not provide an accurate picture of what is available for purchase. Increased knowledge of deployment will aid the library community in understanding what is available to our facilities. We further encourage the commission to collect data from providers on the discounted lines that it provides to institutions, such as libraries. Such reporting could encourage the providers to meet the demand of libraries.

In alignment with the core principle of our profession -- that of open access to information -- we encourage the Commission to disseminate information about deployment of broadband. This will allow the public to make a more informed decision on what services to purchase. Similarly, libraries will be able to maximize use of their resources by knowing what is available to them. Further, as libraries increase the services available to the public in their homes, increased knowledge of broadband options will help patrons make informed decisions and increase usage of service provided by the library.

We applaud the Commission for responding to new technology trends, such as wireless, but we must emphasize the need to understand essential broadband technology and its deployment prior to actively gathering data on wireless connectivity. For example, the Commission could study wireless deployment, with an emphasis on whether it is being deployed as a last mile solution in areas where wire-based alternatives exist or if wireless is being deployed as a solution in unserved areas, where it will be the only option. Further, it would be valuable for the Commission to study the intended usage of wireless solutions. For example, the terms of service from a large mobile wireless company explicitly states that usage “as a substitute or backup for private lines or dedicated data connections” is prohibited. This would indicate that this particular solution is an equivalent to a wire-based solution, and we encourage the Commission to take this, and other factors, into account.

Respectfully Submitted,

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