ALAAmericanLibraryAssociation

June 23, 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 June 19, 2014, Marijke Visser, Assistant Director, American Library Association Office for Information Technology Policy (OITP); Larra Clark, Director, Program on Networks, OITP; Lynne Bradley, Director, ALA Office of Government Relations; and Alan Fishel, Senior Counsel, OITP; met with Commissioner Mignon Clyburn; Rebekah Goodhart, Wireline Legal Advisor to the Commissioner; and Laura Arcadipane, Law Clerk to the Commissioner. The following topics were discussed:

ALA discussed issues related to simplification of the application process and proposals that might best support libraries that lag the furthest behind in broadband capacity to meet community needs. Simplification proposals include:

- *Eliminate discrimination against consortium applications*. Each application within a consortium application must be fully reviewed and approved before any applicant may receive approval; thus consortium applications are often last to be approved. A process change is needed to allow approved applications to proceed in a more timely fashion;
- *Replace E-rate program procurement rules with those of the applicable locality or state*. The E-rate program is extremely proscriptive when it comes to procurement policies, and this is unnecessary as libraries already have procurement rules for most everything else they need to purchase to operate;
- *Allow applicants to receive their E-rate funds directly from USAC* (rather than having reimbursements first go to the provider, which then must send it to the library); and
- *Eliminate the Form 470 and allow applicants to file an "evergreen" Form 471 for multi-year contracts*.

We also discussed the importance of data transparency and enforcement of the lowest-corresponding price rule as many libraries—particularly in more rural parts of the country—receive no bids or only one bid for eligible services.

Finally, ALA discussed the need to support access to affordable, scalable high-capacity broadband and support for state agency-enabled network planning and guidance.

- As of 2012, 75 percent of rural libraries reported maximum internet speeds of 10 Mbps or slower—far, far away from the library and school broadband speed goals envisioned by the Commission and by President Obama.
- Access and affordability are the leading barriers libraries report to increasing their broadband speeds.
- ALA proposes the Commission designate a portion of the $2 billion "down payment" toward deploying scalable and affordable 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. Investments made in rural areas will increase library participation in the E-rate program; dramatically move libraries toward the capacity goal of 1 gigabit per second speeds for libraries by 2018—if not earlier; and provide evidence for cost-effective practices that will ultimately lead to more efficient use of E-rate funds.

One option for supporting affordable and scalable technology is to reduce barriers and provide incentives to support the creation of school-library wide access networks (WANs) where desired at the local level. In some instances it may be more cost-effective for the applicant, as well as the E-rate program, for the nearby library to leverage the school's broadband capacity than for the library to obtain its own broadband capacity, completely separate from the school's network. The State Education Coordinators Alliance (SECA) also references potential benefits for this kind of collaboration in their April 2 filing.[1]

In light of the Commission's focus on improving wireless access in libraries and schools, ALA also described a proposal that would assist libraries that lack dedicated IT staff to support their internet access and network needs. Based on conversations with state library agency staff, technology consultants and local library staff, ALA believes coordination with and support for state agencies in network design, planning and procurement would improve library broadband inside our buildings to better support patron devices and services, while also support cost efficiencies.

State library agencies (SLAs) are well-positioned to bridge deep local knowledge of their libraries with an understanding of state/regional contracting and federal policy priorities. For example, SLAs manage the Library Services and Technology Act (LSTA) funding, administered by IMLS, submitting five-year strategic plans and ensuring that the funds are invested to support critical and transformational library service needs. SLAs routinely work with peer state agencies and departments, such as those for Labor, Education, and Economic Development to align library programs and partnerships with state priorities.

ALA's proposal—which is supported by the Chief Officers of State Library Agencies[2]—also leverages the expertise of the state library agency to develop best practices for addressing local challenges. For example, state library staff in Kentucky, Oklahoma and Colorado have had positive experiences and good local impacts from past efforts to support network assessment and remediation in small numbers of libraries in their states. Kentucky and Oklahoma also have filed separately in this proceeding. We seek to take the next step to move from local solutions to a more broad-based state-level look at network design, bulk purchasing and other potential state and regional-level consortium opportunities.

---

[1] See SECA filing at: http://apps.fcc.gov/ecfs/document/view?id=7521096681 (p. 24).
[2] See COSLA filing at: http://apps.fcc.gov/ecfs/document/view?id=7521099099.

Increased library broadband capacity to and within our buildings supports "The E's of Libraries™" in communities nationwide: completing educational offerings beyond the traditional school day for learners of all ages, jumpstarting employment and entrepreneurial opportunities, engaging community partners and empowering millions of people who rely on public libraries for their only or best access to the internet and internet-enabled resources and services.

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

Respectfully submitted,

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