July 3, 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 July 1, 2014 Marijke Visser, Assistant Director, ALA Office for Information Technology Policy (OITP) and Alan Fishel, Senior Counsel, OITP met with Jon Wilkins, Gigi Sohn, Patrick Halley, Daniel Alvarez, Michael Steffen, Trent Harkrader, Lisa Hone, Jonathan Chambers, Nick Alexander, Charles Eberle, Kate Dumouchel, and Soumitra Das of the FCC. The following topics were discussed:

ALA raised concerns about the proposed formula for library applicants for the new category 2 services (Wi-Fi access). Specifically, ALA sought clarification that the proposed per square foot formula is based on current costs and noted that for libraries (the majority of which are at 10 Mbps or below) to provide access to robust Wi-Fi to patrons throughout the library building, we anticipate many will need to significantly upgrade their current internal wiring, wireless access points, and related services. ALA raised strong concerns that the proposed per square foot formula is insufficient to cover eligible costs for Wi-Fi equipment and services. ALA is currently seeking input from rural, urban, and mid-size libraries to determine an adequate per square foot.

ALA also asked for clarifications regarding the proposals for multi-year contracts and plans for the phase out of POTS, noting that many libraries would not participate in the program with out the option for applying for POTS. ALA urged the Commission to develop in its proposals the means to “compensate” applicants by making it easier to apply for other services when POTS is no longer an eligible service.

ALA discussed the merits of USAC contracting with state library agencies (and the equivalent entity for K12 schools) in any efforts to address problems applicants have in procuring services cost efficiently as well as implementing network infrastructure and internet access. In addition to directly benefitting program applicants, ALA expects such a model to yield improved aggregate processes such as improved network performance practices and bulk buying, developed through a grassroots (local/regional/state) approach.

Further ALA sought clarification on several issues we anticipate being put forward for further public input in the near term. These include: how to address areas where libraries do not have

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access to high capacity broadband; the need for affordable recurring costs for the high-capacity once it is available; and additional means to ensure libraries have access to scalable broadband.

ALA reaffirmed its commitment to working with the Commission on this current proposed order and on the continuing process. We note that moving forward on addressing the Wi-Fi gap is a significant first step that should not be delayed and must be seen in the context of fully addressing broadband needs of libraries today and in the future.

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