

ALA American Library Association

July 5, 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 28, 2014 during the American Library Association Annual Conference, Gigi Sohn, Senior Counsel for External Affairs for Chairman Wheeler, met with the following to discuss issues and concerns related to library broadband and the E-rate Modernization proceeding.

Emily Almond, Georgia State Library
Carolyn Anthony, Skokie Public Library (IL)
Bob Bocher, OITP Fellow
Melinda Cervantes, Pima County Public Library (AZ)
Tim Cherubini, Executive Director, COSLA (Chief Officers of State Library Agencies)
Marc Gartler, Madison Public Library (WI)
Ann Joslin, Idaho State Library
David Leonard, Boston Public Library
Linda Lord, Maine State Library
Larry Neal, Clinton-Macomb Public Library (MI)
Vailey Oehlke, Multnomah Public Library (OR)
Monica Schultz, Peninsula Library System, (CA)
Cal Shepard, North Carolina State Library
Pam Smith, Rangeview Library District/AnyThink Libraries (CO)
Shane Southwick, Alaska State Library
John Szabo, Los Angeles Public Library

Also American Library Association staff:

Marijke Visser, Assistant Director, ALA Office for Information Technology Policy (OITP)
Larra Clark, Director, Program on Networks, OITP
Alan Fishel, Senior Counsel, OITP
Barb Macikas, Director, ALA Public Library Association

The following topics were discussed:

Participants reiterated the role that public libraries play in supporting education—for K12 students and also for non-traditional learners. Libraries are a critical part of the education system. Madison

Public Library has a strong initiative to work with K12 students as do the other libraries represented. For example, Madison works with students to do video interviews for employment and applying for college. LA Public Library recently started issuing accredited High School diplomas. Libraries are also in the midst of summer reading programs to prevent “summer slide” in reading. Today access to technology is also part of the summer slide, a gap which libraries fill. Participants shared information about increased WiFi usage, Multnomah Public Library, for example logged 1 million WiFi sessions in one year.

Participants raised concerns about the continued lack of affordable high-capacity broadband for many libraries, especially those in rural areas where it may not exist at all. Related, participants discussed the issues a lack of competition in rural areas has caused small and rural libraries. In many instances these libraries pay excessive prices for internet access and cannot afford to upgrade to the speeds they need to provide critical community services.

A number of participants shared examples of what happens when a library has inadequate broadband coming in to the library. At Cobb County Public Library, they had to cancel a program demonstrating how to download a book because the library bandwidth was so terrible. Pima County Public Library has also had to cancel programs because of inadequate bandwidth. With the trend in many libraries to provide video conferencing and video interviews for job training, streaming video, and similar bandwidth dependent applications, libraries won't be able to keep up without high-capacity broadband to the building.

Participants voiced support for making prices for internet service (and other services) more transparent. Additionally participants discussed consortia models and emphasized that consortia function differently though agreed that consortia purchasing can lead to economies of scale. Concerning multi-year applications, some concern was voiced on whether a library entering in to a multi-year application could have some certainty that the out years would still be funded. Finally, participants praised the Commission for addressing application complexity noting that this is one of the biggest reasons libraries do not participate in the E-rate program.

Participants also discussed the proposed library formula for WiFi and related services. Concerns were raised as to whether the proposed \$1.00 per square foot is adequate given that for many years most libraries have not received and Priority 2 funding and have therefore not upgraded their networks as much as they would have with more funding. If funding is available, libraries may opt to upgrade significantly and therefore require proportionally more funding.

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

Respectfully submitted,



Marijke Visser
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American Library Association
Washington Office