

ALA American Library Association

July 6, 2014

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

RE: WC Docket No. 13-184

Dear Secretary Dortch:

The American Library Association (ALA) is the largest library association in the United States, and, in fact, is the largest library association in the world, with more than 57,000 members. ALA has provided leadership for nearly 140 years in connection with the development, promotion, and improvement of library and information services and the profession of librarianship. Through ALA's leadership and the leadership of the resulting strong library profession, libraries greatly benefit, in innumerable ways, students, educators, and people of all ages and backgrounds in communities of all sizes across the country.

Throughout the E-rate Modernization proceeding ALA has been in continual contact with librarians from rural, suburban, and urban libraries to gain input on the issues related to increasing broadband capacity "to" the library and "within" the library. In addition to individual librarians, ALA has sought input from state library agencies, ALA's E-rate Task Force, library IT directors, the Public Library Association, and the Association for Rural & Small Libraries.

Regarding three issues under discussion in the draft order, ALA wishes to make the following points:

- ALA supports the use of the proposed per square foot formula for Category 2 services with the understanding that it contain a floor for libraries under a certain size. This is a metric that can easily be normalized across all library types and is a number that libraries report to the Institute of Museum and Library Services as part of their routine data collection and reporting requirements.
- ALA supports the multi-step process for E-rate reform with the first order addressing the severe lack of funding for WiFi and related services and application streamlining and simplification. ALA anticipates the streamlining changes alone will have tremendous positive impact for library applicants and will lead to greater library participation in the E-rate program.

- ALA supports moving forward on the draft order immediately. However, we continue to believe that the lack of high-capacity broadband TO the majority of libraries remains a critical issue and must be addressed by the Commission in the very near term.

Finally, we look forward to working with the Commission on these outstanding issues. If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Marijke Visser".

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

Cc:
Commissioner Mignon Clyburn