

ALA American Library Association

July 7, 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 7, 2014, Marijke Visser, Assistant Director, American Library Association Office for Information Technology Policy (OITP) met by phone with Rebekah Goodheart, Wireline Legal Advisor to Commissioner Clyburn; and Laura Arcadipane, and Adrian Peguese, Law Clerks to the Commissioner. The purpose of the call was to clarify points made in a previously filed ex parte letter to Commissioner Clyburn. Specifically we discussed ALA's proposed formula for category 2 services.

ALA supports the use of a square footage metric that also includes a floor for libraries under a certain size for allocating category 2 funds to libraries. After reviewing the impacts of various metrics, including a per patron measure or a service area (population) measure, ALA determined that a square foot formula has several distinct benefits. First, square footage is data that libraries are required to submit to the Institute of Museum and Library Services (IMLS) as part of their yearly reporting requirements. Second, it is a number that is readily normalized across libraries compared to a per user based formula as libraries capture user data in many different ways. Third, regarding the Commission's efforts to simplify the program, ALA believes that basing a formula on a user model could lead to unnecessary delays during the administrative review process from USAC.

ALA has reviewed costs for Wi-Fi services and related internal wiring from a wide variety of libraries. While not comprehensive we believe that \$2.30 per square foot with a floor of \$9,200 (or 4000 square feet) is an accurate measure.

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