



July 7, 2014

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner O'Reilly, Commissioner Pai, and Commissioner Rosenworcel:

The undersigned library organizations have come together at this critical juncture in the ongoing E-rate modernization proceeding to speak with a united voice on behalf of state and public libraries serving communities of all sizes in all 50 states. Our nation's public libraries depend on affordable, scalable, high-capacity broadband in order to complete Education, jumpstart Employment and Entrepreneurship, and foster individual Empowerment and Engagement, or the *E's of Libraries*<sup>TM</sup>. The services today's libraries provide are not "nice to have." They are critical for communities across the country. Libraries serve everyone from birth through Medicare Part D, and librarians provide the expert assistance integral to successfully navigating the digital world.

For these reasons, we stand together to support the Commission in its efforts to ensure libraries and schools have affordable access to scalable 21<sup>st</sup> century broadband that supports digital learning; maximize cost-effectiveness and streamline administration of the program. We stand ready to work with the Commission and other stakeholders in advancing President Obama's goal of connecting our students and their communities to the 1 gigabit speeds we know are necessary for many libraries today and for the remaining libraries tomorrow.

We appreciate the Commission's attempt to address the long-standing shortfall for libraries in receiving *virtually any* funding for internal connections—including Wi-Fi services—over the course of the program. We support the focus of this first order to address this lack of robust Wi-Fi throughout library and school buildings, so long as the Commission recognizes that further steps are critical to ensure these vital community institutions have high-capacity broadband “to” the building, and not just “within” the building, and that such further steps must be taken before the end of this calendar year. Both high capacity broadband to the building, and within the building, are needed to enable libraries to provide the nearly endless array of vital services that they offer including, by way of example only, providing online digital learning and distance education opportunities; providing offering videoconferencing for small businesses and entrepreneurs as well as for job interviews; providing access to real-time healthcare information with medical professionals; and providing opportunities to connect with family, experts, across states, across countries, and across continents. As noted above, these examples are only a small handful of the services that libraries offer today.

We also take this opportunity to provide further input on the specific Wi-Fi needs of our libraries. Virtually all public libraries now provide free public access to Wi-Fi, and use of these networks in (and around) our libraries is exploding. Libraries host more than 1.5 billion in-person visits each year, and Wi-Fi is now considered a foundational and essential library service that enables access to the public internet, as well as a growing range of digital content. Accordingly, it is vital that the Commission adequately fund internal connections and Wi-Fi, as well as allow for the flexibility, local planning and decision making needed to develop robust Wi-Fi networks for all libraries and the people they serve.

As the Commission finalizes its decision on the proposed library formula for the new “Category 2” services, we urge the Commission to fully implement its proposed plan to allow for local needs of libraries. The Commission should not adopt a measure that is based on outdated costs when we know that the majority of libraries need to dramatically upgrade their internal networks to scale for the gigabit goals we all support. To that end, collectively we have sampled libraries to determine a rational and reasonable formula for libraries that seek Category 2 services. As a result, we strongly recommend the Commission reconsider the current proposed formula of \$1.00 per square foot, as well as the proposed “floor” because each is significantly inadequate for libraries' needs. The Commission must adopt a dollar amount that accommodates the broad range of library needs and does not inadvertently disadvantage libraries because of their size or location.

We believe that the time to act is now so that changes made today in Washington, D.C., can take hold immediately in communities across the country. We urge the Commission to avoid delay and move forward on July 11. We look forward to ongoing engagement with the Commission as it continues the E-rate modernization process after this July Order in order to ensure that the critical further steps alluded to above are addressed later this year. While our diverse organizations may differ on some of the details on the best path forward for program

improvements, we are in agreement that to delay this important first step will shortchange our nation's public libraries and the communities they serve.

Respectfully submitted by the:

Association for Rural & Small Libraries  
American Library Association  
Chief Officers of State Library Agencies  
Public Library Association  
Urban Libraries Council

cc: Gigi Sohn  
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