

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Development of Nationwide Broadband Data to) WC Docket No. 07-38
Evaluate Reasonable and Timely Deployment of)
Advanced Services to All Americans, Improvement)
Of Wireless Broadband Subscribership Data, and)
Development of Data on Interconnected Voice over)
Internet Protocol (VoIP) Subscribership)

COMMENTS OF
THE AMERICAN LIBRARY ASSOCIATION

The American Library Association (ALA) is the oldest and largest library association in the world, representing some 65,000 members. ALA strongly urges the Commission to consider the crucial role that libraries play in providing the general public with access to the Internet.

Ninety-nine percent of public libraries offer the public access to the Internet at no charge,¹ which is particularly important in areas where broadband is not widely deployed or for segments of the population who cannot obtain or afford high-speed access. Public libraries always have been, and continue to be, important centers of educational and economic opportunity for the public, and often provide access to computers and broadband Internet services that are otherwise unavailable to several sectors of our society.

We applaud the Commission for the improvements to existing data collection procedures that are laid out in the Report and Order. We are particularly pleased to see the redefinition of broadband speed metrics. We believe that the new requirements for providers to report information according to different categories of broadband service will give a much more accurate picture of today's broadband landscape. This is particularly true for libraries, since their role as providers of public access to the Internet means that they may be supporting connectivity for dozens of terminals. This requires a broadband connection far more robust than the previous definition of 200 Kb/s. The previous 200 Kb/s standard has been sometimes cited by industry representatives, incorrectly, as defining adequate bandwidth for libraries.

We are also pleased to see the Commission's move to collect broadband subscribership information by census tract rather than by state. This information should provide policy-makers with a more detailed snapshot of both the availability and affordability of broadband services. As a result, public

¹ Bertot, J. C. et al. (2007). Public Libraries and the Internet: 2007: Study Results and Findings. ("Public Libraries and the Internet") Available at http://www.ii.fsu.edu/plinternet_reports.cfm.

libraries can better target their resources to those census tract areas that have fewer broadband subscribers. Libraries play a key role in connecting rural Americans with the opportunities of the information age; in order to support this role we need more accurate availability information than the current data provides.

With regard to the specific questions raised in Section IV(B) of the Further Notice of Proposed Rulemaking, the American Library Association is working to help libraries obtain the broadband connectivity they need to serve their patrons. This multi-pronged effort includes encouraging libraries to participate in the Commission's E-rate program; conducting site visits in low-connectivity states to better understand barriers; and exploring the role of state and regional networks in providing and promoting Internet access. Yet our efforts to enhance public libraries' broadband connectivity are often stymied by the lack of good information regarding the availability of high-speed facilities. As the leading advocate for libraries in the information age, the American Library Association is absolutely dependent on accurate, useful and timely broadband availability data.

For this reason, we strongly encourage the Commission to develop the broadband map described in the Further Notice of Proposed Rulemaking. Furthermore, we challenge the Commission to expand data collection beyond residential customer information to include key community organizations like our nation's more than 16,000 public libraries, in recognition of the vital role they play in providing public access to the Internet. We believe that this map will provide the accurate and detailed picture of broadband availability that public policy and library leaders need to help libraries obtain greater connectivity.

In the Further Notice of Proposed Rulemaking, the Commission flags confidentiality concerns around the development of a highly-detailed map of broadband facilities, and suggests limiting access to the information to organizations "focusing resources on expanding broadband availability in a manner similar to the focusing of resources enabled by the Connect Kentucky project." While we adhere to the principles of privacy and confidentiality, we strongly encourage the Commission to make this data (in some form) widely available. To be blunt, keeping this information cloistered within the FCC or a small select group will do nothing to help the very organizations, like ALA, that are working to solve the connectivity crisis for their constituent groups. Furthermore, organizations such as ours must be able to share this information as part of our broader advocacy efforts and the work we more directly undertake with libraries to improve their broadband connectivity.

Thank you for considering our comments.

Sincerely,

Emily Sheketoff
Executive Director
ALA Washington Office