In the Matter of

Development of Nationwide Broadband Data to 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

WC Docket No. 07-38

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. 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.

With regard to the questions raised in Section IV(D) of the Further Notice of Proposed Rulemaking, ALA urges the FCC to collect and publicly disseminate information about delivered broadband speeds and prices. ALA works to help libraries obtain the broadband connectivity they need to serve their patrons. As the leading advocate for libraries in the information age, ALA is dependent on accessible, accurate, and up-to-date broadband pricing data.

Accurate, independent broadband pricing information is crucial for the ALA to assist libraries in
negotiating affordable broadband connectivity. While individual households typically do not negotiate prices with providers, libraries and businesses routinely do. To this end, it would be useful for a library to be able to compare broadband prices available in a similar market. For example, collecting information on baseline T1 broadband connection prices would allow a library in one county or state to know what a typical T1 costs is in another county or state. This benchmarking can help a library in a higher priced location negotiate lower rates because it would know there is a lower rate offered in another location.

Carriers have argued that when broadband services are bundled into packages that include cable television or telephone services, determining “broadband only” prices is difficult. Even if this is true, there are some "standard" broadband offerings that are often made available separate from other services, such as T1, T3, OC-1, and OC-3. We urge the FCC to require providers to report the stand-alone monthly price for broadband service in these or similar speed tiers.

Up-to-date broadband pricing information is necessary for ALA to effectively engage in its library connectivity efforts. With broadband speeds and prices changing so rapidly, the traditional FCC information collection and release cycle renders the gathered data useless. Libraries would receive out-of-date, obsolete data that would be inadequate for meaningful negotiation efforts. In order to reduce the lag between the collection and publication of this information, the FCC might build a web site to capture near real-time changes in broadband prices. For example, the web site BroadbandCensus.com (http://www.broadbandcensus.com) allows visitors to conduct a broadband speed test, thus comparing their actual Internet speed against what their carriers promise. The addition of robust pricing information to a similar site could create a powerful information tool for libraries in their quest to obtain affordable, reliable broadband service.
Markets can only function when there is a disclosure of information, but if the Commission continues to exclude carrier pricing information from the public data that it releases, libraries are not likely to benefit much from other areas of granular information collection. Currently, operator services providers are required to file informational tariffs under 47 U.S.C. 226(h)(1)(A). This informational tariff “shall contain specific rates expressed in dollars and cents for each interstate operator service of the carrier and shall also contain applicable per call aggregator surcharges or other per-call fees, if any, collected from consumers by, or on behalf of, the carrier.” Collecting and disseminating similar specific broadband pricing data can help increase the efficiency and competitiveness of the broadband market in general.

Chairman Martin, speaking about network neutrality at the FCC hearing held at Harvard University in February, said that broadband providers should be transparent about the speed, services and prices they offer. We heartily concur. While carriers typically cry foul when asked to release details on pricing, ALA feels this information is essential for libraries to broker reliable, sustainable broadband connectivity that supports public access to information on the Internet. In conjunction with accurate, unbiased data on broadband availability, straightforward pricing information can help ALA assist libraries in obtaining the broadband services they need to serve library users.

Thank you for considering our concerns.

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1 47 C.F.R. § 64.709(a)
Respectfully submitted,

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