

# ALA American Library Association

October 19, 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 October 10, 2014 Marijke Visser, Associate Director, ALA Office for Information Technology Policy (OITP) spoke by phone with Rebekah Goodheart, Wireline Legal Advisor to Commissioner Clyburn about issues related to closing the capacity gap as described by Chairman Wheeler in recent remarks at the Ed Tech Summit in September. Specifically, the following topics were discussed:

- ALA is pleased that the Commission is now addressing the lack of high-capacity broadband to the building, noting that that majority of libraries still report speeds of 10 Mbps or less. Rural libraries lag even further behind their urban counterparts, reporting about 70% at such speeds.
- Libraries continue to report that the lack of affordable rates prevents them from seeking higher speeds even when they are available. This is the case for about 60% of all libraries, regardless of locale.
- The lack of competitive choices for rural libraries in particular remains a significant concern. For example, one state reported that more than half of its libraries received no bid for service.
- Where high-capacity broadband is not currently available, ALA would like to see rules related to the amortization for construction costs clarified and in instances where it is the most cost-effective solution, an equal treatment of lit and dark fiber.

ALA generally supports technologies that allow libraries—regardless of locale or size—to scale toward the gigabit goal adopted by the Commission. In most instances this means a fiber connection. Finally, ALA believes that in order to successfully address the capacity gap additional funding will be necessary.

If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully submitted,



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