

ALA American Library Association

October 27, 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 23, 2014, Marijke Visser, Associate Director, the American Library Association's Office for Information Technology Policy (OITP) and Alan Fishel, Senior Counsel, OITP met with Trent Harkrader, Lisa Hone, Kate Dumouchel, Bryan Boyle, and Sean Conway of the Technology Policy Access Division and by phone, Patrick Halley, Associate Chief of the Wireline Competition Bureau. The following topics were discussed.

ALA discussed ways in which the E-rate amortization rules could be modified and/or clarified for special construction projects to encourage competition in areas where libraries receive one or no bids for service, including allowing self-construction projects and protections the Commission might put in place related to special construction. ALA also discussed cost allocation rules in instances where a library or school may wish to connect to a network that includes non-eligible entities.

Finally, ALA clarified its position regarding the Category 2 (C2) budget system. ALA supports the approach adopted in the July Order as it more equitably distributes available C2 funding to more libraries and schools as compared to the previous Priority 2 system. Given the specific \$1 billion yearly target, there is also a certain amount of reliability that over the course of the five year cycle, more libraries and schools will receive funding than under the old model. ALA therefore supports retaining the budget system for C2 after the two year test period.

ALA, however, appreciates that over the two year test period the Commission may identify ways that the budget system could be improved. For example, the Commission could elect to reinstate voice components as eligible services to C2 since a budget, effectively "caps" individual expenditures and thereby in essence provides a more flexible system for local decision making than does a system without such protections. Related to libraries, ALA requested that the relationship between the budget floor for smaller libraries and the square footage amount be taken into account should any adjustment to the current formula be considered.

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

Respectfully submitted,

A handwritten signature in grey ink, appearing to read "Marijke Visser", with a long horizontal flourish extending to the right.

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