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ALAAmericanLibraryAssociation

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 03-109
        WC Docket No. 96-45
        WC Docket No. 11-42

Dear Secretary Dortch:

On November 21, 2011, Larra Clark, Director of Program on Networks, Office for Information
Technology Policy (OITP) American Library Association (ALA); Marijke Visser, Assistant
Director, OITP; and, by phone, John Windhausen, consultant to ALA and founder of Telopoly
Consulting; met with FCC staff Diane Griffin Holland (by phone), Kim Scardino, Garnet Hanly,
Trent Harkrader, Douglas Klein, Marcus Maher, Josh Gottheimer, Jordan Usdan, and Rebekah
Binah (by phone) to explore the legal justifications for potentially funding digital literacy training
out of the Lifeline and LinkUp program.

The ALA suggests that the Lifeline and LinkUp program, which currently supports low-income
consumers' adoption of telecommunications services, is a better fit for supporting digital literacy
and broadband adoption efforts than the E-rate program, which is restricted to supporting ongoing
connectivity needs of libraries and schools.

ALA's main points are summarized below.
1. The FCC does not have authority to use E-rate for digital literacy training. E-rate
    connectivity is restricted to supporting the telecommunications and advanced services
    connectivity needs of schools and libraries.
2. It is not clear that any funds from the Universal Service Fund (USF) can be used for digital
    literacy training. In general, the USF was created for to support the provision of
    telecommunications and advanced services, not for "content" such as training.
3. However, should the FCC determine that the USF is available for digital literacy training,
    the Lifeline and Linkup program is the most appropriate program to support such training,
    because both digital literacy training and Lifeline/LinkUp are intended to promote adoption
    by residential consumers.
4. Alternatively, the FCC could create a fifth program for digital literacy and broadband
    adoption within USF.

If you have any questions or need additional information, please do not hesitate to contact me. Please call 202.628.8410 or email me at mvisser@alawash.org.

Respectfully submitted,

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