



October 14, 2014

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 13-184

Dear Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai, and O’Rielly,

The undersigned organizations, representing state education leaders across the country, rural students and educators, and libraries throughout the nation, call on the Commission to immediately take three critical, interrelated steps to meet the broadband capacity goals for schools and libraries set forth in the July 2014 E-rate Order. Without these steps, those goals will, unfortunately, be unattainable and, even more importantly, many communities and the children in them will simply fall further behind. Conversely, by implementing these steps, the Commission will help set this country on a path to success for generations to come.

These steps all relate to the need for the Commission to address the broadband capacity gap to our libraries and schools. In this regard, the Commission must remove the barriers that prevent schools and libraries from having robust high-capacity broadband to their doors. These barriers include three important interrelated components:

- First, there remain areas where high-capacity broadband is simply not available, particularly in rural parts of the country. Even if fiber or other comparable technology is in the vicinity of the library or school but the building is not connected, that school or library in effect does not have access to high capacity broadband. Similarly, if a library or school receives no response to a request for service, access to high-capacity broadband is denied to that library or school. Access to such service does not just appear at the schools’ and libraries’ doors. The Commission must take specific steps—where high-capacity broadband is not available or providers are unwilling to provide service—to help ensure that these schools and libraries have such access. The Commission must address this “access gap.”
- Second, many libraries and schools continue to report that the recurring costs for high-capacity connections prevent them from upgrading even when higher speeds are available. The Commission must resolve this “affordability gap” that thwarts libraries and

schools today. The changes made in July that address high or disparate costs are a step forward, but there are additional steps to ensure greater competition the Commission must also take to ensure the affordability of ongoing broadband costs throughout many areas of the country.

- Third, closing the access gap is one of the main reasons more funding is needed in the E-rate program. Without adequate funding the Commission cannot ensure that those schools and libraries that lag behind the capacity goals adopted in July will gain any ground. In fact, without the additional funding, coupled with additional improvements to the program as referenced above, the lack of access cannot be addressed and those libraries and schools will just fall further behind. The Commission, accordingly, must address the clear “funding gap.”

To close the above “gaps” in the program, the Commission will likely need to make some policy changes. In other instances, current rules may simply need to be clarified or enforced. Only if the Commission addresses these gaps simultaneously and immediately through appropriate rulings will the nation’s libraries and schools have the infrastructure they need to fulfill their respective missions and thus ensure that their communities thrive today and for generations to come.

To be clear, the necessary infrastructure of today’s learning environments is the foundation for opportunity. The record at the Commission is replete with examples of what students and community members can accomplish in a well-connected school and library. Those fortunate enough to have such a library or school start out light years ahead of those who do not. The Commission must make a choice: Will it close the capacity gap and ensure opportunity for all or will it allow inequity to continue to grow? Stated more directly, is it time to narrow the digital divide, or should we simply let it continue to widen and leave many communities and their children at a clear disadvantage and on the outside looking in? We think the answer is clear.

In closing, this last phase of the E-rate modernization proceeding is the most critical for the Commission to get right—not just for the nation’s libraries and schools, but for the students, educators, and communities they serve. With the appropriate rulings, the Commission can help guarantee that schools and libraries on tribal lands, in rural America, and in urban centers can provide educational opportunity for students and library patrons, regardless of locale. The Commission took initial steps in the right direction in July, but those steps will be meaningless to so many across the nation unless the Commission takes the appropriate action here. Thus, we urge the Commission to bring its modernization efforts to a successful conclusion through specific actions to close the gaps discussed above.

Respectfully submitted,

The American Library Association
The Association for Rural and Small Libraries
Organizations Concerned about Rural Education
The Public Library Association
The State Educational Technology Directors Association
The Rural School and Community Trust

cc: Daniel Alvarez
Rebekah Goodheart
Amy Bender
Nick Degani
Priscilla Delgado Argeris
Jonathan Chambers
Patrick Halley
Trent Harkrader
Lisa Hone
Jon Wilkins