

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Modernizing the E-rate Program)	WC Docket No. 13-184
For Schools and Libraries)	

COMMENTS OF THE MONTANA STATE LIBRARY

The Montana State Library respectfully submits these comments in response to the Wireline Competition Bureau’s Public Notice requesting comment on the sufficiency of budgets for category two services under the E-rate program.¹

The Montana State Library (MSL) is both a library and the state agency in Montana charged to provide assistance and advice to all tax supported or public libraries in the state.² Thank you, on behalf of Montana libraries, for the opportunity to comment. In brief, MSL supports the category two funding framework as it exists today and we believe the Commission should maintain category two budgets.

Like schools and libraries around the country, Montana libraries continue to see a steady increase in the use of Wi-Fi by patrons. In 2016 Montana’s 82 public libraries, who support a population of just over 1 million people, reported that they supported 418,312 wireless usage sessions.³ Librarians report receiving phone calls in the middle of the night about patrons parked outside the library accessing Wi-Fi, a service they are happy to provide.

¹ *Wireline Competition Bureau Seeks Comment on Category Two Budgets*, WC Docket No. 13-184, Public Notice, 32 FCC Rcd 7012 (2017).

² Montana Code Annotated, 22-1-103, http://leg.mt.gov/bills/mca/title_0220/chapter_0010/part_0010/section_0030/0220-0010-0010-0030.html.

³ Montana public library statistics, collected by the Montana State Library for fiscal year 2016.

Montana schools have made use of category two funding since its creation. As reported in the analysis published by Funds for Learning and the Alliance for Excellent Education, Montana schools received more than \$1.6 million for Wi-Fi support. 59% of these funds went to rural schools.⁴ This funding helps to ensure that Montana students have the needed infrastructure for learning and serves to benefit our communities.

Montana libraries have been slower to make use of both category one and category two E-rate funds but the lack of applications does not reflect a lack of need for this funding. All Montana libraries provide some level of Wi-Fi access however, for many, it is challenging to do so. Montana libraries exist in early 20th century Carnegie libraries, doctors' offices, one-room-school houses, banks, and many other facilities designed and built well before the dawn of the Internet. Boxy construction, with thick plaster and concrete walls, are physical barriers to Wi-Fi service that is expensive to overcome.

Upgrading and maintaining equipment is also expensive. Many Montana libraries use routers they purchased through the Broadband Technology Opportunity Program (BTOP) prior to 2011. This equipment is at or near end of life.

The barriers that exist that prevent libraries from making use of E-rate are less physical. MSL is working hard to understand and to help libraries overcome these barriers. One barrier is libraries' capacity to manage Wi-Fi technology and availability due to lack of information technology staff. This barrier is almost universal in Montana's rural libraries where 39% of libraries have fewer than two FTE.⁵ For this reason, MSL supports the addition of managed Wi-

⁴ Alliance for Excellent Education, *New Analysis Shows E-Rate Program Supporting Wi-Fi Services in More Than 42,700 Schools Nationwide*, <https://all4ed.org/press/new-analysis-shows-e-rate-program-supporting-wi-fi-services-in-more-than-42700-schools-nationwide/> (Sept. 18, 2017).

⁵ Montana public library statistics, collected by the Montana State Library for fiscal year 2016.

Fi as a qualifying expense so that libraries may use third-parties to install and manage their Wi-Fi networks.

Another consistent barrier that prevents libraries from applying for E-rate funds is what is perceived to be, and often can be, an onerous application process. MSL supports any work that will simplify the application process. Specific to these comments, MSL supports recommendations from the Schools, Health and Libraries Broadband Coalition to streamline the form 500 and other reporting requirements.

MSL additionally supports the suggestion that the Commission pursue the idea of master contracts for category two equipment. MSL made use of multi-state purchasing agreements to efficiently and cost effectively procure broadband technology during BTOP for more than half of Montana's public libraries. This kind of scalable approach to technology procurement has a proven track record and would ease the procurement burden for Montana libraries.

MSL's ability to aid libraries to make more use of E-rate monies is predicated on the availability of these funds. MSL applauds the Commission for seeking to improve the program. MSL supports the category two funding framework and believes the funding should be maintained. MSL hopes that the Commission will serve as a partner to help reduce the barriers to access E-rate funds and to continue to ensure access to Wi-Fi through our country's schools and libraries.

Respectfully submitted,

A handwritten signature in black ink, reading "Jennie Stapp". The signature is fluid and cursive, with the first name "Jennie" written in a larger, more prominent script than the last name "Stapp".

Jennie Stapp
Montana State Librarian