



## Cochise County Library District

*Public Programs...Personal Service*  
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**AMADEE RICKETTS**  
Director

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

July 25, 2019

Dear Chairman Pai,

I am writing in response to the Federal Communications Commission's (FCC) Public Notice which considers changes to the Universal Service Fund (USF) programs, including E-Rate. Before explaining my response to the proposed changes, I want to express my appreciation for the FCC's continued support for the E-Rate program and for the critical modernization measures the commission adopted in 2014. The E-Rate program provides critical discounts to assist libraries, like my own rural library system, to obtain affordable telecommunications and internet access.

The Cochise County Library District, based in Bisbee, Arizona, has participated in the E-Rate program since its inception, and the program has made it possible to provide internet access in areas that are otherwise unserved or underserved.

Cochise County is very rural and located on the international border with Mexico. It is a beautiful place to live, but high poverty rates and low population density mean very limited internet and telecommunications infrastructure. According to the 2018 Arizona Broadband Strategic Plan, fewer than 60% of county residents have access to residential internet service of 25 Mbps / 3 Mbps or better. That statistic includes the couple of large towns in our county, so the numbers are significantly worse the rural communities served by our libraries.

Aside from supporting internet service at the rural libraries for nearly two decades, over the last two years E-Rate has made it possible to upgrade to 100 Mbps service at the rural branch locations in Bowie, Elfrida, Portal, Sunizona, and Sunsites. The surrounding areas have very limited internet service and spotty cellular coverage, so the importance of offering robust service at the libraries – for students, job seekers, entrepreneurs, and residents from all walks of life – cannot be overstated.

The E-Rate program, and the broader USF program, is succeeding in its mission. As the FCC moves forward with this public notice, I hope the decisionmakers will remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted in 2014, allowing those changes to progress and play out as intended. Any changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate has played a critical role in the rapid and significant expansion of connectivity in schools and libraries, and I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools and libraries with rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the

original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

I am opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers.

The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries. Specific to E-Rate and schools/libraries, where school system and library leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how schools and libraries plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to meet the needs of their communities.

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity (specifically, access to high-speed broadband).

A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet to be fully recognized—is poor policy. The FCC must support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to adequate connectivity.

As I stated above, the E-Rate program has been critical in supporting rural library service in Cochise County. Specifically:

- a. The five rural branch libraries were able to upgrade (from 10 Mbps or less) to 100 Mbps service in 2018. This absolutely would not have been possible without E-Rate funding.
- b. The rural branches used E-Rate Category 2 funding, made possible by the 2014 modernization of E-Rate, to upgrade internal connectivity equipment in 2018. Without this improved equipment, the increased connection speed would not have made a significant difference in the level of service available to the public.
- c. Having reliable broadband access has improved the functionality of the library's circulation system, which requires consistent network access. This has greatly improved the customer experience as well as efficiency for staff and volunteers.
- d. The state of Arizona has provided matching funds that may enable a countywide broadband consortium for public schools and libraries. If this program moves ahead, it will result in substantial cost savings and bring high-speed broadband to locations that have never had access before.

In closing, I reiterate my library system's strong support for, and reliance upon, the E-Rate program in order to access and afford the high-speed connectivity that is so central to our rural patrons. Thank you for considering these comments.

Sincerely,



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