

ALA American Library Association

November 5, 2019

Chairman Ajit Pai
Federal Communications Commission
445 12 Street S.W.
Washington, D.C. 20554

RE: The Commission's pending E-rate category two Order and concerns for inadequate category two budgets for certain urban libraries WC 13-184

Dear Chairman Pai:

We are writing today to raise concern about the potential decrease in the category two (C2) budget formula for those libraries that are currently eligible for \$5.00 per square foot. These are the largest, most urban libraries and those with the highest patron use of the library's Wi-Fi internet connectivity. As you know, the American Library Association (ALA) has commented on innumerable E-rate proceedings on behalf of our 16,557 public library members. The E-rate program remains the most critical funding source that ensures the nation's libraries have the network broadband capacity they need at affordable prices. ALA is already on record supporting the permanent adoption of the C2 budget system for libraries.¹ We are hopeful that the Commission can bring this item to a quick resolution so libraries have the assurance essential C2 funds will be available and they can plan as needed for the July 1, 2020 E-rate application cycle.

We note, however, that while the program has seen less of an increase among rural library applications than those from urban libraries eligible for the greater \$5.00, we do not believe there is any information in the record that provides a rationale for lowering the current urban formula and strongly oppose such an action. On the contrary, as stated by Greg Mickells, Director, Madison Wisconsin Public Library, urban libraries depend on the current formula. "It is mission critical for an urban library to be able to maintain upgraded networks and provide adequate broadband access. This will require that, at a minimum, the \$5.00 per square footage Category 2 budget allocation remain in place and we hope this will be increased to \$6.00 as recommended by ALA. Any reduction to the allocation will severely imperil our ability to meet this need." Should the Commission elect to provide a single square foot formula for all libraries, it would in effect be prioritizing rural communities to the detriment of their urban counterparts while each has equal

¹ See Comments of the American Library Association -- WC 13-184. Filed August 16, 2019 (<https://ecfsapi.fcc.gov/file/10816028233870/ALA%20Category%20Two%20comments%2008162019.pdf>).

need to increase broadband capacity on a regular basis, meeting ever growing patron demand for Wi-Fi. Our initial comments in response to the Commission's C2 Notice of Proposed Rulemaking propose an increase in *both* the non-urban and urban library formulas from \$2.45 and \$5.32 to \$3.00 and \$6.00 respectively.²

Since the 2014 modernization, ALA has focused on increasing the participation rate of all libraries and are pleased that more libraries are taking advantage of the C2 funds available. Given the trend of library services requiring increasingly robust broadband, we anticipate in the coming years more libraries will want to upgrade internal networks, build new spaces or re-engineer current building design, all of which will require C2 funding. The Commission will make the right call to make the C2 budgets permanent. We respectfully urge you to also make the right call and meet the needs of both non-urban and urban libraries as all communities deserve equitable access to robust broadband services. Thus we stand by our initial comments that the pending C2 Order allocate \$3.00 for rural libraries and \$6.00 for urban libraries.

Thank you for your consideration in this matter.

Sincerely,



Dr. Alan Inouye
Senior Director
ALA Public Policy & Government Relations



Marijke Visser
Senior Policy Advocate
American Library Association

cc

Commissioner Brendan Carr
Commissioner Michael O'Rielly
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks

² Ibid.