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APR 11 1996

9 April 1996

**CALIFORNIA  
LIBRARY  
ASSOCIATION**

1895-1995

**MARY SUE FERRELL**  
Executive Director

Office of the Secretary  
Federal Communications Commission  
1919 "M" Street, N.W.  
Washington, D.C. 20554

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Dear Sir,

The California Library Association is pleased to respond to the Federal Communications Commission Notice of Proposed Rulemaking, Federal-State Joint Board on Universal Service (NPRM) (Docket 96-45). The California Library Association is more than 100 years old and 2500 members strong. Its members represent all types of libraries and all parts of the state.

The landmark Telecommunications Act of 1996 will have an enormous impact on individuals, schools and libraries in the state of California. Effective implementation of Section 254 (Universal Service) will determine the ability of our schools and libraries to meet the challenges of educating and equipping California residents to meet the challenges of the global marketplace and an information society.

#### NPRM SECTION II. Goals and Principles of Universal Service Support Mechanism

The Association supports the statement of principles in Section II of the NPRM. Of particular concern to Californians, in addition to the availability of just, reasonable and affordable rates, is the principle of access to advanced telecommunications and information in all regions of the nation. Access to these "advanced telecommunications and information services" is rapidly becoming part of "basic telecommunications" services, in order for all Americans to compete on an equal footing. We also strongly support the intent of Section 254, Subsection h, which provides for access to advanced telecommunications services for schools, health care and libraries, at discounted rates.

We are particularly concerned with the definition of the "core" group of services, the provision of which is to be supported for consumers with low income or in rural, insular and high cost areas. Increasingly, access to the more "advanced" telecommunications services will become essential to being able to effectively and equitably operate and compete. For example, federal and state announcements of contracts and grants are available far more

provide access to advanced telecommunications and information services. The California Library Networking Task Force defined "affordable" as no more than the cost of a local telephone call and this was endorsed statewide last summer by 400 participants in Network Forums.

The InFoPeople project enabled libraries serving isolated communities to increase communication with other areas of the state. Limited local educational resources were considerably enriched by the ability to tap into the Internet. In rural areas, libraries with advanced telecommunications links can encourage economic development through the services they provide to small business.

#### NPRM SECTION IV. Schools, Libraries and Health Care Providers

Section IV of the NPRM addresses key principles of universal service, providing that elementary and secondary schools and classrooms, health care providers, and libraries should have access to telecommunications services at reduced rates.

##### B. What Services to Support

The NPRM (paragraph 71) asks what services, in addition to the core services discussed in Section III, should be made available at a discount to schools libraries and rural health care providers. Libraries need to be able to access the full range of information resources. Therefore, discounted access to any telecommunications service available in the geographic area should be available to libraries and schools. For example, libraries, including rural libraries, currently need to have access to high-speed data lines adequate to transmit graphic images, digital video and digital sound.

As mentioned above, the definition of these additional services must be subject to periodic review in order to evolve to meet user needs. One participant in the InFoPeople project recently wrote that the library was able to participate only because it was able to get a year's free ISDN service from Pacific Bell and a free Internet connection through a nearby university. The library's continued ability to provide Internet access to the public is in jeopardy without continued assistance.

NPRM: Services provided by telecommunications carriers receiving universal service support must be "for educational purposes"

Public libraries, school libraries, and libraries in academic institutions have as their primary mission the provision of access to information,

quickly electronically than in paper. In the near future, given the federal government's rapid transition to electronic methods of dissemination, this information may not be available at all in paper.

We agree with the NPRM (paragraph 66) that the list of services receiving universal service support should continue to evolve. We recommend that the list of core services be reviewed at least every three years, as proposed by the California Public Utilities Commission. For example, the explosion in the use the World Wide Web has occurred primarily over the past three years.

We believe the definition of core services that should be supported might be different for schools and for libraries than it is for individuals, although this concept is perhaps addressed by section IV of the NPRM. When information and services that individuals require are available only electronically, they can use computers in libraries for access. This is analogous to the concept of public phones, which enable those on the road or without phone service to communicate. Public Internet access in libraries serves much the same function. Libraries are also a place where people can try out new services before making the substantial investment required for home or office access.

The majority of Californians do not have home computers which can access important electronic information resources. Public and school libraries can play a significant role in providing for an informed citizenry. Libraries can serve as a broad-based access point for Internet-based electronic information resources.

The feasibility of such library programs is demonstrated by the California State Library's successful Internet for People (InFoPeople) project. Using federal money from the Library Services and Construction Act, InFoPeople funded an Internet workstation, training and connect time in 180 public library facilities throughout the state. One year before, in March 1994, only a single public library offered Internet access. The California State Library has recently awarded additional grants to connect an additional 155 of California's 800 major public library facilities through InFoPeople.

### NPRM SECTION III. Support for Rural, Insular and High-Cost Areas and Low-Income Consumers

In California, with a large rural population, access to telecommunications and information services at rates comparable to those offered in urban areas is a high priority. Since a rural library may be a long way from an Internet hub, rural libraries first need affordable long distance rates in order to

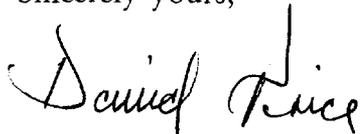
regardless of format. Libraries accomplish this educational mission by providing equipment to access information, and assistance in locating and using information. They also create their own information resources (such as library web pages and guides) to assist users. The library also provides an introduction to new information resources, and provides training and assistance in their use.

The library is an institution of lifelong learning. Funds expended to ensure library access to advanced telecommunications services are funds well spent: public institutions such as public libraries and schools, including colleges and universities, can provide subsidized access to those who do not have equipment, training and access agreements as an effective way to ensure equitability of access to the information superhighway.

The InFoPeople experience demonstrated strong interest by the public in using the Internet in public libraries. The types of uses are an excellent indication of the kinds of educational services libraries provide: the greatest usage included job information, small business information and government information. The InFoPeople project has also successfully linked the community around the library, bringing together schools, libraries and community organizations.

In Paragraph 86, the NPRM asks about the effect of the Telecommunications Act of 1996's provision that "tele-communications services and network capacity" provided to schools and libraries through universal service support mechanisms "may not be sold, resold, or otherwise transferred by such user in consideration for money or any other thing of value." This is indeed a concern for libraries, and we ask that rulemaking be carefully worded to avoid discouraging cost-recovery measures for services that would otherwise be fiscally prohibitive (such as FTP) and to avoid discouraging cooperative projects. Many libraries, schools and communities are involved in cooperative projects to provide access to electronic communications and information resources. These cooperative projects have many positive benefits for the community, and are often the only way in which some libraries or schools could have been able to participate.

Sincerely yours,

A handwritten signature in cursive script that reads "David Price". The signature is written in black ink and is positioned below the typed name.

David Price  
President, California Library Association