

**From:** Barbara Burdette <bburdett@leo.vsla.edu>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/13/97 4:59pm  
**Subject:** Application simplification

Dear Mr. Nadel,

Discounts will be of great importance to rural and technology-deprived people. Please exert every influence to make the application process simple and easy to figure.

My only eloquence is in the need of my patrons. Please hear them.

Sincerely,

Barbara Burdette  
Augusta County Library  
Rt. 2, Box 600  
Fishersville, VA 22939

**CC:** Linda Krantz <lkrantz@leo.vsla.edu>

**From:** Laura Bryant <lbryant@leo.vsla.edu>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/14/97 9:58am  
**Subject:** Erate application

Please do not make the application for E-Rate so complicated that it will negate any benefit for small rural public libraries. We do not have the staff, professional training, an EE degree that will be needed if it is necessary to apply for each service for each library. Does the FCC really want to help us? If so use the KISS principal.

--

		Laura A. Bryant	Ph:540-236-2042
	_\  _\  _\ :__ :__:	Galax-Carroll Regional Library 608 W. Stuart Dr. Galax, VA 24333	FAX:540-236-5153 lbryant@leo.vsla.edu

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** "DeFuniak Library" <dfslibrary@access.aic-fl.com>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/13/97 4:16pm  
**Subject:** New Forms for discounts

Our library is small and rural. These new forms are way too much work on an already overburdened staff. It looks like a way to get everyone to not apply.

Please help us by requiring a less complicated form.

Eileen Burg  
Walton-DeFuniak Library  
De Funiak Springs, FL 32433

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** "Sarah C. Caltvedt" <scaltvedt@linc.lib.il.us>  
**To:** ALA\_DC\_DMN.INET("iflanner@fcc.gov", "mnadel@fcc.gov...  
**Date:** 10/13/97 3:14pm  
**Subject:** Universal Service Discounts - Form 471

I am writing to urge that the application for universal service discounts NOT be changed to require library consortia to apply separately for each type of service in each location served. Library consortia have been formed to achieve economies of scale, simplify the management of technology and enable smaller, poorer libraries to provide better service to their citizens by banding together. My library, the Glen Ellyn Public Library, is part of a nine-member automation consortium. We had expected that we would have to apply only for discounted telephone service, while our consortium would handle the application for Internet service shared by the group. Asking the consortium to apply separately for the service provided to each member library is unreasonable and puts an undue burden on their staff. When a service is shared by a group spread over a wide geographic area, with members of differing sizes and budgets, how can it be broken up into individual applications for individual contracts? It is my understanding that the point of the universal service discount was to encourage libraries and schools to seek out the best possible pricing for telecommunications services and then apply for discounts on those prices so that all libraries and schools can afford access to modern telecommunications technologies. Discouraging group purchases does nothing to advance that aim. Please reconsider and do everything you can to simplify the process so that the intent of the law can be achieved.

Sarah Caltvedt  
Director  
Glen Ellyn Public Library  
400 Duane Street  
Glen Ellyn, IL 60137  
630-469-0879  
scaltvedt@linc.lib.il.us

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** "Kim Capron (PARK)" <kcapron@will.state.wy.us>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/10/97 7:01pm  
**Subject:** Changes made to Forms #'s 470/471

Mr Nadel,

I felt I had to write after hearing of the changes made to forms 470/471 used for apply for Universal Service fund dollars. Our school districts and public libraries in Wyoming have taken a severe beating during the last few years as our state has faced declining revenues from oil/gas and mineral companies. There are not enough man power hours in the day to keep up with all of the coming technology. We are often overwhelmed by the tasks we face in helping our children into the next century. Just as a bright light like discounted rates for telecommunication access is put before us it is snatched away again because of the unending red tape that there is no way to accomplish.

Please make this process real. Don't create such a nightmare of red tape that the people who need this help the most can't reach it. Simplify. Please.

Kim Capron  
Park County Library System  
Tel./FAX (307) 587-6205  
e-mail kcapron@will.state.wy.us

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** Carol Caro <CCARO@mln.lib.ma.us>  
**To:** ALA\_DC\_DMN.INET("IFLANNERY@FCC.GOV", "MNADEL@FCC.GO...  
**Date:** 10/12/97 5:56pm  
**Subject:** Universal Service Form 470 and Form 471

Mark and Irene,

I am writing to comment on the proposed changes to Forms 470 and 471.

As the director of a library network of 37 libraries the proposed changes will make an already complicated process a nightmare. The spirit of the original legislation was to help schools and library upgrade their telecommunication lines and equipment so graphical access to the Internet would be possible before the next century. These new proposed complications will certainly slow down the process for may eligible schools and libraries and for others make it impossible. At this time I encourage you to simplify procedures rather than complicate.

Speaking for the Minuteman Library Network which is on the verge of beginning an upgrade so its 37 members can have graphical Internet in all its libraries, I urge you to move forward so we can move forward with our project.

Carol Caro  
Executive Director  
Minuteman Library Network  
4 California Avenue  
Framingham, MA 01701  
VOICE: 508 879-8575 ext 223  
EMAIL:ccaro@mln.lib.ma.us  
FAX: 508 879-5470

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ) , ALA\_DC\_DMN.INET("NETADMI...

**From:** "James B. Casey" <jimcasey@lib.oak-lawn.il.us>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/10/97 7:27pm  
**Subject:** E-Rate Discount Application Procedures

Dear FCC Executives:

As a public library director long experienced in grant writing and administration, let me urge that the level of complexity in applying for E-Rate Discounts be reduced as much as possible.

Although my present public library is large enough for me to have sufficient staff support to prepare Technology Plans and other required paperwork, I was once director of a smaller rural public library in which I was the only M.L.S. trained librarian on staff. Custodial, clerical, security, etc. duties fell to my lot along with all of the more professional and administrative concerns of a library open and functioning 7 days per week. Time is at a major premium in such libraries. Expertise and skills are also more difficult to find in smaller, rural library settings. Many such impoverished libraries cannot afford to attract professionally trained librarians. Hence, where money is scarce, so are time and expertise. FCC should consider that reality if the libraries in greatest need of the E-Rate discounts are to benefit.

Thanks for considering my statement of concern.

James B. Casey -- My own views as a Public Library Director and  
ALA Council Member.

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** <Cateclan@aol.com>  
**To:** ALA\_DC\_DMN.INET("iflanner@fcc.gov", "mnadel@fcc.gov...  
**Date:** 10/12/97 3:24pm  
**Subject:** Universal Service Program Application Forms

I serve on the Board of Trustees of a local countywide library system which has nine branches. It would be a major burden on our staff to have to complete the numerous application forms which apparently would be required if you proceed with the changes proposed to Form 471 at your October 10 meeting.

Please do all you can to make the application process easier -- not more involved and more difficult -- so that libraries and schools are not discouraged from applying for this very important discount program.

Sincerely,

Sara Jane Cate, Chair  
White House Conference on Library and Information Services Taskforce  
4502 Coventry Road  
Harrisburg, PA 17109-1638  
717-652-0642

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO (ASJ)

**From:** Susanna Collins <scollins@leo.vsla.edu>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/13/97 11:49am  
**Subject:** Universal Service discount

Please reconsider the changes made in the applications for the Universal Service discount. Those of us working in small rural libraries have been counting on this to help provide improved access to services and information for our public.  
Thank you.

Susanna A. Collins  
Director  
Lancaster Community Library

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** Debby Conrad <dconrad@sailsinc.com>  
**To:** ALA\_DC\_DMN.INET("iflannery@fcc.gov", "mnadel@fcc.go...  
**Date:** 10/14/97 9:31am  
**Subject:** Proposed changes in the Universal Service Discount Forms

I am writing to comment on the proposed changes to Forms 470 and 471. I administer two library networks with a combined membership of 49 public and school libraries. I am deeply concerned that the proposed changes will make the process of obtaining Universal Service Discounts for the network members extremely complicated and time consuming. We exist in order to provide all types and sizes of libraries affordable access to electronic information resources. We do that by streamlining our administrative processes. The proposed changes would require me to submit multiple filings for contracts that would really provide service for the entire network. In addition, the complicated process could discourage some libraries from applying for the discounts. I urge you to institute a less complicated filing process.

Debby Conrad  
S.A.I.L.S. Inc.  
(headquarters of ABLE and SEAL)  
Executive Director

508/946-8600 ext. 11  
508/946-8605  
dconrad@sailsinc.com

**CC:** Network Administrators <netadmin@ocln.org>

**From:** <HOPE@bham.lib.al.us>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov", "iflanner@fcc.gov...  
**Date:** 10/13/97 12:53pm  
**Subject:** Forms 470 & 471 for Universal Access

Mr. Mark Nadel  
Universal Service Branch  
Federal Communications Commission

Dear Mr. Nadel:

This is a very strong request to reconsider changes being considered for forms 470 & 471, which schools and libraries will be required to complete, in order to request discounts in telecommunications service.

The poorest and most rural agencies are the ones in most need and with the fewest resources for calculating the figures and completing the complicated federal forms which are being proposed. These are the groups which need to be able to aggregate figures for discount rates. The changes being considered will discourage the most needy from participating.

I strongly suggest that the Universal Access discount application process and the forms for that process should be as simple and uncomplicated as possible.

The idea of Universal Access is to get the most amount of information to the people who need it the most, at the least cost in dollars, time and effort for all involved. Changes which require detailed and specific information on every service for every location becomes a mathematical and paperwork nightmare, which no one needs and which violates the spirit of the concept.

It would be a pleasure to see a governmental agency lead the way in truly simplifying a process which can bring so much good to so many people.

Sincerely,

Hope I. Cooper  
Coordinator, Support Services & Facilities  
Birmingham Public Library  
2100 Park Place  
Bham, AL 35203  
205-226-3744

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO (ASJ)

**From:** "Cooper, Sandra" <scooper@hal.dcr.state.nc.us>  
**To:** "'FCC: Mark Nadel'" <mnadel@fcc.gov>, "'FCC: Ir...  
**Date:** 10/13/97 7:24am  
**Subject:** E-Rate: Proposed Forms & Procedures

Dear FCC Staff:

On behalf of the public libraries of North Carolina, I would like to express my concern about the proposed changes in the wording on Forms 470 and 471. As I understand it, the proposed forms would require that a form be filed on behalf of each library outlet and for each service for a library system or a statewide library system. These changes will make an already complex system much more complicated!

**\*\*Burden for Local Public Libraries**

In North Carolina, there are 75 consolidated public library systems with nearly 400 outlets. This proposed change will create additional barriers to applying for those libraries that most need the discounts. The more complex the system for application, the less likely the smaller, poorer libraries are to apply for discounts.

During an August workshop for public library directors conducted by the State Library of North Carolina, we found that the current process for qualifying for the e-rate is viewed as complicated and difficult to understand despite the attempts of two staff from the State Library of Florida and our staff to make it simple and clear. They were confused and frustrated by the end of the session. The proposed changes to the forms and the procedures will only make it more burdensome.

**\*\*\*Increased Burden for State Library Agency\*\*\***

We at the State Library of North Carolina are exploring ways to work with State Telecommunications Services to simplify the process for small public libraries to qualify for the e-rate by taking advantage of the existing state library network and the services of State Telecommunications Services. The proposed changes to the forms will complicate that effort--and will ultimately cost taxpayers by increasing the time it will take to complete applications and paperwork.

I urge you to work toward simplifying the process for qualifying to make it as easy as possible for those libraries most in need of discounted telecommunications rates to qualify for them. Please feel free to contact me if you need additional information or have any questions.

Cordially,  
Sandra M. Cooper

\*\*\*\*\*  
Sandra M. Cooper, State Librarian  
State Library of North Carolina  
109 East Jones Street  
Raleigh, NC 27601-1807  
Telephone: 919.733.2570  
Fax: 919.733-8748

I-mail: scooper@hal.dcr.state.nc.us  
\*\*\*\*\*

CC: "'Johnson, Aleck'" <asj@alawash.org>

**From:** "Jack Finnerty" <jrf@albright.org>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/14/97 10:33am  
**Subject:** Proposed Changes to Form 471

Dear Mr. Nadel:

Unless the process for participating in the erate subsidy is kept simple, small & medium sized public libraries, along with less affluent school districts, will NOT derive the intended benefit as they will be unable to muster the resources to effectively compete for what most certainly will prove to be insufficient funds.

Jack Finnerty  
Director  
Scranton Public Library  
500 Vine Street  
Scranton PA 18509  
voice: 717-348-3013  
fax: 717-348-3020  
e-mail: jrf@albright.org

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** "Christiane D. Freer-Parsons" <cdfreer@lahontan.clan.lib.nv.us>  
**To:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)  
**Date:** 10/13/97 4:44pm  
**Subject:** Universal Service Program (fwd)

Mr./Ms. Johnson:

"Enclosed" is the message I sent to the FCC. Please contact me if you have any questions or if I can be of further assistance.

Christiane "Kiki" Freer-Parsons, Director  
Lyon County Library System  
20 Nevin Way  
Yerington, NV 89447-2399  
(702) 463-6645 Fax: (702) 463-6646

----- Forwarded message -----

Date: Mon, 13 Oct 1997 13:42:09 -0700 (PDT)  
From: Christiane D. Freer-Parsons <cdfreer@lahontan.clan.lib.nv.us>  
To: mnadel@fcc.gov  
Cc: iflanner@fcc.gov  
Subject: Universal Service Program

Mr. Nadel and Ms. Flannery:

I am communicating with you, via e-mail, in order to meet the 12Noon, October 14th, deadline for comments on the application process libraries must undertake to participate in the universal service program. I manage a five branch, rural library system. My budget is built to serve the system and not broken down into individual branch elements. I manage the five branches as a system and have never been required, either for federal and state granting purposes or for other accounting reasons, to split the budget into five units.

I am strongly opposed to the proposed amendments to the application form that would require that I calculate, at the branch level, how possible funds would be used. All the branches are part of a consortium in which membership is based on the system's participation NOT at the branch level. I fail to see why I must undergo the needless and burdensome task of splitting financial hairs in order to receive benefits that will be utilized by my library system.

This proposed change seems wasteful and pointless and I wish to be on record as being firmly against any requirement which would place such undue burden on a library system's such as ours.

Sincerely,

Christiane "Kiki" Freer-Parsons, Director  
Lyon County Library System  
20 Nevin Way  
Yerington, NV 89447-2399  
(702) 463-6645 Fax: (702) 463-6646

**From:** Ann Friedman <afried@co.arlington.va.us>  
**To:** ALA\_DC\_DMN.INET("iflanner@fcc.gov")  
**Date:** 10/13/97 4:36pm  
**Subject:** proposed changes to form 471

In a densely populated urban community of only 26 square miles in which the public schools and public libraries share one network and information system, area wide discounts are the only way to approach the issue. Many of our facilities are less than one mile apart - and the services and discounts will not vary from facility to facility. Our community has benefitted from a consortium approach to services and any other approach serves no benefit even if it is only on a form. Please do not impose this burden. Ann Friedman, Director. Arlington County (VA) Libraries.

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** Bob Gaines <gaines@ctls.net>  
**To:** Mark Nadel <mnadel@fcc.gov>, Irene Flannery <iflan...  
**Date:** 10/10/97 6:59pm  
**Subject:** Proposed changes to USF forms

Mr. Nadel and Ms. Flannery:

I was astonished to learn that at this late date the FCC is contemplating making even more difficult the process of applying for the E-rate discounts.

I have been struggling since last May to educate myself about the discounts by scouring the various FAQs posted by the FCC and state agencies. As I am sure you are aware, there are still far too many unanswered questions about the way the program will work.

I have been attempting since June to help the 60 public libraries I work with, as well as libraries in other regional systems in Texas, to understand how to take advantage of the discounts. After numerous mailings from me and four workshops which I've given for 200 persons, I can assure you that most of these folks remain confused about what the E-rate is and how to apply for it.

Just today I've tried with mixed success to explain the E-rate to 7 librarians and one city grants coordinator who called me. I'd estimate that not one in ten of the librarians in my system understands enough at this point to make an application without help. And from what my counterparts in the other Texas regional systems tell me, the ratio of confusion or ignorance is much higher elsewhere (I was asked yesterday to do an E-rate workshop in three other systems because they don't have anyone to educate their librarians).

We need the time between now and January 1 just to help librarians and school folks understand the most basic aspects of applying. If you make it any more difficult, it will certainly mean delaying applications well into next year. We need the discounts as soon as possible.

Assuming you have a legitimate need to get the additional information from the application form, why not give us a pass this time and revise the forms for next year? After all, July isn't that far away!

Bob Gaines  
Central Texas Library System  
PO Box 2287 Austin, TX 78768  
gaines@ctls.net  
512-499-7489  
fax 499-7516

**CC:** Aleck Johnson <asj@alawash.org>, Kathleen Krause <...>

**From:** Ronald Gagnon <gagnon@noblenet.org>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov", "iflanner@fcc.gov...  
**Date:** 10/14/97 8:59am  
**Subject:** Aggregration and Forms

I am writing to urge that the application for aggregated applications under the Universal Service Fund for libraries and schools be kept as simple as possible.

Please reconsider the proposed changes to Form 471.

The more time spent on complex forms and formulae leaves less money in the consortium to help the users of libraries and students. Further, line orders are bundled to reduce overall line costs, and in our case already help to subsidize some poorer libraries. Charging back the actual cost could actually increase the cost for these libraries.

The cost allocation method is agreed to by all participating libraries.

The North Of Boston Library Exchange (NOBLE) is a non-profit consortium of 25 libraries founded to foster the sharing of resources among libraries through shared automation projects. We have operated an aggregated data line network since 1985 and provided all our member libraries Internet access for six years. All lines and contracts are in NOBLE's name and line costs are apportioned according to system use, not geography.

Thank you for your consideration.

-----  
Ronald A. Gagnon | North of Boston Library Exchange, Inc.  
Executive Director | Danvers, Massachusetts  
gagnon@noblenet.org | Ph: 508-777-8844 Fax: 508-750-8472  
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**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ), ALA\_DC\_DMN.INET("rendell...



**From:** "Denise A. Garofalo, Director for Technology"  
<denise@ulysses.sebridge.org>  
**To:** ALA\_DC\_DMN.INET("iflanner@fcc.gov", "mndae@fcc.gov" ...  
**Date:** 10/13/97 8:29pm  
**Subject:** FCC form 471 proposed changes

Dear Mr. Nadel and Ms. Flannery,

I am writing to comment on the changes proposed to fprms 470 and 471. Specifically I am most concerned about the changes to numbers 7 and 8 on Form 471.

If the FCC forces applicants to apply individualized discount rates rather than "area wide" discount rates, systems and districts which serve a large area and many branches/buildings/libraries will be severely and negatively impacted.

These proposed changes are a disincentive to aggreration as well as a means to undermine currently existing cost-allocation mechanisms.

In the case of the Mid-Hudson Library System, we serve 65 member libraries and their branches. The proposed changes will add an even greater level of complexity to the process for us. Other systems/districts may find the burden too great to deal with and not apply at all, thereby defeating the whole purpose of the discount program.

In the best interests of the libraries and schools the program is intended to aid, please reconsider the proposed changes.

Thank you.

Sincerely,

Denise A. Garofalo

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*****
Denise A. Garofalo           "The human mind is like an umbrella--
Director for Technology      most useful when open."
Mid-Hudson Library System    ---Walter Gropius
103 Market Street
Poughkeepsie, NY 12601
vox (914) 471-6060 x.34
fax (914) 454-5940
e-mail denise@sebridge.org
*****
```

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** Michael Gilley <mgilley@leo.vsla.edu>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/14/97 8:57am  
**Subject:** Universal Service Fund application procedures

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According to T. Michael Gilley:

Dear Mr. Nadel,

I am writing to express my concern over the proposed application process for the Universal Service Fund. It is my understanding that any formal grouping of multiple service facilities would require that separate applications be completed for each facility and for each service contract. Such a process would present a burden to small rural public library systems which are already understaffed.

Our library system in Southwest Virginia serves two rural counties with four facilities and a bookmobile. In order to afford automating our libraries, we formed a consortium with a neighboring library system (Galax-Carroll Regional Library) in 1993. Thus far, it has been through the formation of regional libraries and consortiums for cooperative partnering that small rural libraries have been able to make small advances with technology. Please do not penalize us for utilizing a partnership that has helped us move forward.

The Universal Service Fund is very important to our continued growth in the future. Our smallest branch is situated on the second highest mountain in Virginia - Whitetop. The community we serve with this branch is not even incorporated with a population of less than six hundred. Our telecommunication and Internet services to connect this small branch to other libraries and the world constitute a quarter (\$3,075.00) of the total operating budget (\$12,667.13) and is only \$645.00 less than the funds spent on books, periodicals, and audiovisual materials for this branch. This branch is eligible for an 80% discount.

As you can see, the Universal Service Fund will make a difference in the future of rural public libraries such as the Whitetop Public Library. Please do not allow the application process to become too burdensome and complicated.

Thank you very much.

Respectfully,

T. Michael Gilley, Director  
Wythe-Grayson Regional Library  
P. O. Box 159  
147 S. Independence Ave.  
Independence, VA 24348

PHONE: (540) 773-3018  
FAX: (540) 773-3289  
E-MAIL: mgilley@leo.vsla.edu

"Knowledge is of two kinds. We know a subject ourselves, or we know where we can find information upon it." Samuel Johnson, Ib. April 18, 1775.

"However there is no knowledge of any kind without ACCESS to information."  
T. Michael Gilley, April 18, 1995.

**CC:** ALA\_DC\_DMN.ALA\_DC\_PO(ASJ),ALA\_DC\_DMN.INET("nworley...

**From:** "William Alfred Goodrich" <billg@smyth.net>  
**To:** ALA\_DC\_DMN.INET("mnadel@fcc.gov")  
**Date:** 10/13/97 10:34am  
**Subject:** Proposed application forms for Universal Service

Dear Mr. Nadel:

I wish to bring to your attention my deep concern about the changes to proposed application forms for universal service discussed in the Friday, October 10 meeting at the FCC. Changes in the forms were proposed that would dramatically increase the level of burden faced by libraries and schools in filling out the application forms. The proposed forms outline a system wherein libraries and schools would be required to allocate all services down to the level of individual libraries and schools and calculate discounts for those services, irrespective of how library and school administrative entities are already allocating costs. This burden will limit the ability of the Smyth-Bland Regional Library, a rural Appalachian public library system, and the many other public libraries like us, to participate. It will also make it more difficult if not impossible for us to participate with area school systems and other entities in cooperative arrangements. These cooperative arrangements are often the only way agencies like us can afford to provide needed services to our users. We believe that the application process should not be this complex.

The most troubling changes were made on Form 471, where applicants list the services for which they wish to receive universal service support, several key wording changes were made. Specifically, items #7 and #8, which had been labeled "Services ordered by more than one entity (e.g. file server used by entire school district) (not location specific)" and "Services ordered by individual school or library (location specific)" were altered to read "Services PROVIDED TO more than one entity" and "Services PROVIDED TO individual school or library".

The net effect of this change is to force applicants to apply individual library's and school's discounts to the vast majority of services, rather than allowing library systems and school districts to calculate an "area wide" discount rate. For EVERY service ordered for EVERY location, the applicant will be required to apply an individualized discount rate. Applicants also will be required to provide extensive information on the contract for each branch -- even if the same contract serves multiple branches.

In our case, a library system with three branches ordering a leased line and internet services, the library system would be required to enter 6 sets of information (one for internet and one for the leased line for each location). Each entry would require a calculation of the discount percentage, a listing of the number of patrons served, the name of the service provider, individual information on the contract signed (including the contract number, award date, and expiration date), and cost forecasts for one time, monthly, and/or annual costs.

These changes would be a strong disincentive to cooperation and will undermine currently existing cost allocation mechanisms for library consortia which, in many cases, effectively subsidize poor and rural libraries by treating all line costs as shared.

The elaborate and artificial delineations that would be entailed in meeting the demands of these changes may very well defeat the very intent of Universal Service. I urge you to carefully consider the content of these forms and to make them as unburdensome as possible.

Most sincerely,  
William A. Goodrich

--

William Alfred Goodrich  
Smyth-Bland Regional Library  
118 South Sheffey Street  
Marion, Virginia 24354

Email: [billg@sbrl.org](mailto:billg@sbrl.org)  
Phone: (540)783-2323  
FAX: (540)783-5279

CC: ALA\_DC\_DMN.ALA\_DC\_PO(ASJ)

**From:** liz hamilton <ehamilton@ncsl.dcr.state.nc.us>  
**To:** "mnadel@fcc.gov" <mnadel@fcc.gov>, "iflanner@fcc.g...  
**Date:** 10/13/97 5:13pm  
**Subject:** PROPOSED FORMS

-- [ From: liz hamilton \* EMC.Ver #2.5.02 ] --

Please do not proceed with proposed forms which require allocating all services down to the level of individual libraries to calculate discounts for services. It is unnecessarily burdensome and acts as a disincentive to aggregation in applying which, even if it was your intention, is very unfair. It specifically penalizes those for whom the discounts would be the most useful--poor and rural schools and libraries.

Please re-consider and come up with easy to use forms. Thank you.

**CC:** "iflanner@fcc.gov" <iflanner@fcc.gov>, "asj@alawas...