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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

September 30, 2014

RE: WC Docket No. 13-184 and comments on it filed by the American Library Association on September 15, 2014

Dear Secretary Dortch:

COSLA is an independent organization of the chief officers of state and territorial agencies designated as state library agencies. Each chief officer has responsibility in their respective state or territory for statewide development of public libraries. COSLA's mission is to provide leadership on issues of common concern and national interest, to further state library agency relationships with the federal government and national organizations, and to initiate, maintain and support cooperative action for the improvement of library services.

As stated in our letter dated May 15, 2014, COSLA's priorities for E-rate modernization include simplification of the filing process for E-rate funding; program design that is scalable and promotes affordability; transparency in cost and speed delivered by vendors under E-rate service contracts; last mile build out leading to high speed broadband connectivity to libraries; new methods for determining library discounts rates; and a commitment to ensuring success of the program through ongoing technical assistance, network assessment and procurement.

COSLA read with interest the American Library Association's comments filed on September 15, 2014 and would like to register support for several of its propositions.

- We agree with the fundamental goal for the E-rate modernization process: increasing the percentage of libraries with affordable, high-capacity broadband of at least 100 Mbps in all libraries that serve fewer than 50,000 people and 1 Gbps in all libraries that serve 50,000 people or more.
- We support the allowance of a two-year exemption from competitive bidding rules for business class internet service that costs \$1,800 annually or less and offers a minimum of 50 Mbps downstream and 5 Mbps upstream.
- We appreciate and agree that the two-year trial period for the new C2 funding formula will be a useful period of adjustment for applicants.

Like the American Library Association, COSLA maintains a high level of interest in simplification of the rules and processes around E-rate funding. We believe that simpler processes will result in greater participation, lessening the broadband gap overall. Reaction to the July Order is mixed however. Positive elements include measures aimed at faster processing and the elimination of the technology plan requirement. Also

positive are measures aimed at promoting multi-year contracts. Lacking is greater attention to competitive bidding requirements and greater clarity around consortium approaches. We agree with the American Library Association's concern that some of the proposals for increasing consortia participation will actually make such participation more complex. Additional complexity in any aspect of the program increases the difficulty for state library agencies to effectively serve coordinating and support roles.

COSLA also supports the American Library Association's recommendation to allow longer term contracts where special construction is involved, and to require service providers to lock in affordable prices for a significant number of years for agreements involving special construction. These reforms would be especially beneficial to the rural libraries that virtually all of our members serve.

Finally, COSLA also affirms the American Library Association's stated need to explore new methods for both category I and category II funding, keeping in mind that as in all aspects of E-rate reform, any new methods introduced should do no harm to either rural or urban libraries in their application. We concur with recent remarks by Chairman Wheeler* that a logical and much-needed follow up to the recent expansion of support for Wi-Fi is to close the Rural Fiber Gap, a real problem for many libraries supported by COSLA members.

COSLA remains appreciative of the Federal Communications Commission attention to E-rate modernization and to the American Library Association for its leadership within the library field.

Sincerely,

A handwritten signature in cursive script that reads "Timothy Cherubini".

Timothy Cherubini
Executive Director

*Remarks of FCC Chairman Tom Wheeler as prepared for delivery to the Second Ed Tech Summit: Empowering Educators to Enhance Student Learning in the Digital Era, September 29, 2014.