



October 20, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: Notice of Ex Parte Communication, WC Docket No. 13-184

Dear Secretary Dortch:

The Urban Libraries Council (“ULC”) hereby submits an analysis confirming that a square foot budget method that allocates between \$5 to \$7 per square foot for those library systems in the top five percent of user and size levels would be an appropriate budgetary allocation for the internal network needs of these library systems. The analysis, commissioned by ULC and undertaken by a Stanford University researcher, is based on data collected by the Institute of Museum and Library Services (“IMLS”).

In addition to confirming an appropriate budgetary square foot allocation method for this subset of libraries, the analysis also provides a method by which these library systems can be identified. Using IMLS data, the analysis confirms that these libraries can be identified by their physical location and the population size of their home city using recent census data.

This analysis supports the earlier study and other information provided by ULC, demonstrating that any equitable E-rate budget allocation metric adopted by the FCC for internal network purposes must address the costs, needs and usage of all libraries, including the largest library systems (based on size and user base). Further, any reimbursement formula that does not account for larger library systems will adversely affect cities and the majority of public library WiFi users in the United States.

ULC respectfully requests that the Commission review this important information to better understand the budgetary allocation method that would be necessary for the nation's largest library systems to meet the needs of their users.

Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S Benton". The signature is fluid and cursive, with the first letter "S" being a large, stylized loop.

Susan Benton

CEO – The Urban Libraries Council

cc: Jon Wilkins  
Reed Hundt

Attachment