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October 23, 2014

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

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

Dear Secretary Dortch:

On October 21, 2014, Reed Hundt, outside counsel to the Urban Libraries Council (“ULC”), met with Jon Wilkins, Managing Director of the Federal Communications Commission (“FCC” or “Commission”), to discuss the above-referenced proceeding.

During the meeting, Mr. Hundt reviewed the recent analysis submitted by ULC in this proceeding 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. Mr. Hundt noted that the ULC analysis demonstrates 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).

Finally, Mr. Hundt requested that the Commission review this important information to better understand the appropriate budgetary allocation method that would be necessary for the nation’s largest library systems to meet the needs of their users.

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

Respectfully submitted,

/s/

John M. Beahn

*Counsel to Urban Libraries Council*