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The City and Borough of Juneau, Alaska has been classified as a "small urban cluster" in the recent E-Rate modernization, whereas its previous designation had been rural. Juneau is the second largest municipal location by area or land mass. It is accessible by boat and plane alone with limited opportunity for land-based infrastructure development. Telecommunications and broadband costs are high and Juneau's library has been reliant upon and thankful for e-rate funding that has provided 5-15mb levels of connectivity over the past couple of years. A decrease in funding via a change in designation that impacts the discount rate would have an impact on Juneau's ability to provide good quality connectivity to the community. Juneau asks that the Commission reconsider the issue of rural/urban-cluster/urban designation, and instead weigh other criteria such as: 1) relative size of the land mass to population; 2) roaded/non-roaded systems 3) the cost of infrastructure development in the area, and 4) the operational cost of doing business in any given community. It is appropriate to tailor individual Federal programs to fit the particular program. For example, for Federal Transit Administration and Federal Highway Administration funding purposes, Juneau is considered "rural."

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