

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
Connect America Fund)	WC Docket No. 10-90
)	

Comments of the American Library Association

August 31, 2015

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I. Summary

The American Library Association (ALA) urges the Federal Communications Commission (FCC or the Commission) to support standalone broadband internet access for low-income people through the Lifeline program. We concur with the Commission that broadband access is essential for full participation in civic life and necessary across education, employment, e-government services, and healthcare. Library professionals witness daily the power of technology, as well as the detrimental impact on individuals and their communities when access is unavailable, inadequate, or unaffordable. With the knowledge that more than half of households with incomes below \$25,000 lack broadband service (particularly as compared with 92% of households with incomes between \$100,000 and \$150,000),¹ the Commission must take action to address the gap.

Specifically ALA,

- Encourages the Commission to aggressively address the homework gap for families with school-age children, as well as similar hurdles for vulnerable populations, including people with disabilities;
- Supports Lifeline service standards that are reasonably comparable to the broader consumer marketplace, are regularly evaluated and updated, and to the extent possible fashioned to anticipate trends in technology;
- Comments on increasing competition among Lifeline providers, establishing a budget for the program, and creating a third-party verification system;
- Encourages the Commission to allow libraries that provide WiFi devices to Lifeline-eligible patrons be eligible for financial support for the connectivity of those devices;
- Recognizes the critical importance of addressing the affordability barrier to broadband access through the Lifeline program, but encourages the Commission to continue to identify ways it can also promote broadband adoption; and

¹ File, Thom and Camille Ryan, Computer and Internet Use in the United States, American Community Survey Reports, ACS-28, U.S. Census Bureau, Table 1 (2014) (ACS 2013) available at <http://www.census.gov/history/pdf/2013computeruse.pdf>.

- Reiterates the principles outlined by The Leadership Conference on Civil and Human Rights and supported by the ALA that call for universality of service for eligible households, program excellence, choice and competition, innovation, and efficiency, transparency and accountability.²

ALA urges the Commission and other stakeholders to leverage the myriad services, resources, expertise, and community goodwill of libraries to advance broadband deployment and adoption for all Americans. Libraries are effective and willing collaborators. Lastly, we greatly appreciate the Commission’s continued diligence in improving its stewardship of the Universal Service Fund programs.

II. Introduction

Libraries are dedicated to improving the use of information for members of the community by helping them cross the bridge to digital readiness.³ Libraries stand on a long tradition of providing access to emerging technologies and innovative digital literacy training programs designed to help people become confident broadband adopters. We strongly agree with the Commission that including support for standalone or unbundled broadband access in the Lifeline program would provide a hand up to those on the wrong side of the digital divide and serve as an essential stepping stone to improve economic opportunity for a significant segment of the nation’s low-income population.

As Commissioner Clyburn has stated, broadband has the potential to be the “greatest technological equalizer of our time.”⁴ Modernizing the Lifeline program is a timely step the

² See “Letter from The Leadership Conference on Civil and Human Rights,” to Chairman Wheeler, Chairman, FCC, WC Docket No. 11-42 (filed June 10, 2015). Available at <http://apps.fcc.gov/ecfs/document/view?id=60001077579>.

³ See Horrigan, J., (June 2014). *Digital Readiness: Nearly one-third of Americans lack the skills to use next-generation “Internet of things” applications*, p. 7-8. Available at http://jbhorrigan.weebly.com/uploads/3/0/8/0/30809311/digital_readiness.horrigan.june2014.pdf.

⁴ See remarks of FCC Commissioner Mignon Clyburn, “We Cannot Wait. It’s Time for iBridge Now!” New America Foundation, Washington, D.C. June 22, 2015. Available at

Commission should take towards ensuring that everyone can access this essential tool.

Throughout the modernization process, we urge the Commission to consider the dignity of consumers—from how consumers are introduced to the program; to the ease of applying and sustaining benefits while eligible; to whether privacy concerns are adequately addressed; to whether they are given increased selection and the agency to choose the provider that works best for their needs.

As in the recent E-rate modernization proceeding, we encourage the Commission to make decisions today that accommodate technology developments over time and do not lock the program into any standard or system that will be quickly outdated or overwhelmed.

As the Commission notes, a broadband connection is necessary for virtually all types of communications and activities today. In fact, it is the life blood of the services 21st-century libraries provide. With a high-capacity internet connection, libraries enable **Education, Employment, Entrepreneurship, Empowerment, and Engagement** for our patrons—or what we call *The E's of Libraries*®. In fact, the library often represents its community's only reliable point of free internet access and, as such, its patrons only means of using the growing host of services that are exclusively available online. We are proud to be part of our nation's digital safety net and technology launching pad. Home broadband access expands the reach of our growing digital collections and services—empowering more people to experience limitless learning and full participation in the information age.

It is increasingly difficult for the millions of Americans living without such a connection to complete schoolwork (today roughly seven in ten teachers assign homework that requires access to the internet);⁵ compete for jobs; attend to healthcare needs (the Commission points to research

https://apps.fcc.gov/edocs_public/attachmatch/DOC-334035A1.pdf.

⁵ See Statement of FCC Commissioner Jessica Rosenworcel Re: Lifeline and Link Up Reform and Modernization

suggesting that telehealth services have been shown to significantly reduce hospital admissions); and maintain contact with friends and family. The obstacles that millions of Americans face are undeniable; the urgency of helping them online is clear. We agree with Commissioner Pai’s statement that Lifeline has a noble purpose⁶ and argue that including support for broadband connectivity makes it ever more relevant. ALA appreciates the FCC’s ongoing efforts to ensure the Lifeline program fulfills its statutory charge of providing low-income Americans with advanced telecommunications and information services. As a nation, we cannot afford to allow the “degradation of universal service and the division of our society into information haves and have nots.”⁷

ALA echoes Commissioner Clyburn’s statement, “[t]he time is now to build the bridge to empowerment, independence and connectivity”⁸ by modernizing the Lifeline program.

III. Affordable Broadband Access is a Bridge to Educational Achievement, Individual Empowerment, and Economic Independence

Consistent with previous ALA positions, we strongly support broadband access that is fast, open and future facing.⁹

It is broadly understood that access to high-capacity broadband can be an equalizing factor ensuring that anyone with access and the skills to apply it are afforded the same digital opportunity regardless of geographic location, income level, or other demographic. We agree with the Commission that its equalizing effect is particularly acute for educational achievement and individual empowerment. As such, access is a critical tool that can help individuals facing

(June 18, 2015). Available at <https://www.fcc.gov/article/doc-333992a4>.

⁶ See remarks of FCC Commissioner Ajit Pai (July 28, 2014) at https://apps.fcc.gov/edocs_public/attachmatch/DOC-328469A1.pdf.

⁷ See *Second Further Notice of Proposed Rulemaking*, (FNPRM). June 18, 2015. WC Docket No. 11-42, 09-197, and 10-90 (footnote 39). Available at https://apps.fcc.gov/edocs_public/attachmatch/FCC-15-71A1.pdf.

⁸ See Statement of FCC Commissioner Mignon Clyburn, (June 18, 2015). WC Docket No. 11-42, WC Docket No. 09-197, and WC Docket No. 10-90. Available at https://apps.fcc.gov/edocs_public/attachmatch/DOC-333992A3.pdf.

⁹ See American Library Association comments filed in FCC Docket Nos. 10-90, 13-184, 14-28, 14-115 and 14-116.

other hurdles and challenges achieve educational success and economic stability.

Educational achievement demands anywhere, anytime access to quality learning environments

Libraries are strong partners in supporting learning opportunities for K-12 students, whether in a formal school setting in school libraries or out of school in the public library. The “homework gap” is one that libraries witness daily through the students and families that depend on the library for internet access, and we stand firmly with the Commission in wanting to find creative and sustainable solutions that will bring it to a close. In fact, it is fair to say that the challenges students without broadband at home face is greater than simply supporting homework. This is particularly true for rural students like those in Unalaska (AK), who used the library’s internet connection to explore post-graduation options.¹⁰

ALA is on record at the Commission providing examples and data that explain the many ways libraries support education.¹¹ When the final bell rings, we know students head to the library to work on homework but also to connect with friends, stream video or music, and catch up on social media they might follow. Out-of-school programs are commonplace in the library, and more than one-third of public libraries report hosting science, technology, engineering, arts and math (STEAM) activities in their communities.¹²

When the physical library closes for the night, the projects can continue and students can

¹⁰ See A. Ropeik (February 5, 2014). *Library Technology Helps Students Explore Post-Grad Options*. Available at <http://kucb.org/news/article/library-technology-helps-students-explore-post-grad-options/>.

¹¹ See, for example, ALA Comments, WC Docket No. 13-184 (November 7, 2013) at page 4. Available at <http://apps.fcc.gov/ecfs/comment/view?id=6017475775>.

¹²For example, public libraries in Idaho offer programs ranging from young adults learning about electronics by taking apart computers and making jewelry from the parts; learning about circuits through creating light-up bookmarks using conductive thread and LED lights; and younger children participate in live action program coding to learn the basics of computer programming through interactive game playing. (Personal email correspondence, August 31, 2015).

See also “The Bubbler” at Madison Public Library Out-of-School Time (OST) programs for teens, including for kids in the juvenile justice system. Available at <http://madisonbubbler.org/>. See also the Out-of-School Time Innovation Lab programs for middle and high school students at the New York Public Library. Available at <http://www.nypl.org/ost>.

get additional homework help through the virtual library branch when they have home internet access. For example, many libraries use an online platform that connects kids with live tutors who can answer questions in real-time or provide real-time feedback on essays or math questions submitted to the online platform.¹³ Virtually all libraries also offer 24/7 access to online databases that are not freely available to the public except through a paid subscription by the library for research and test preparation.¹⁴

Today's students are tomorrow's innovators and entrepreneurs, regardless of what field they pursue. Expanding the Lifeline program to ensure broadband access at home for low-income families is essential to equalize opportunity. Additionally, low-income consumers without school-age children but who also are at risk for being bypassed by digital opportunity must also be served through the Lifeline program. We commend the Commission for taking a leading position on the homework gap and encourage it to apply what it learns from this focus to the broader Lifeline-eligible community.

Lifeline should bridge gaps for the most vulnerable populations

In addition to the nation's K-12 students, a Lifeline program that includes support for broadband can be the critical bridge that empowers other vulnerable populations and helps those individuals attain economic independence and participate more fully in civic society as was the vision for universal service. We commend the Commission for bringing attention to the significant and varied benefits broadband access can bring to people with disabilities.

¹³ See the Multnomah (OR) County Library live homework help center available at <https://multcolib.org/resource/live-homework-help-tutorcom>. See also the School Center from the D.C. Public Library available at <http://www.learningexpresshub.com/productengine/LELIndex.html#/learningexpresslibrary/libraryhome>. See also Broward County (FL) Library e-tutor service available at <http://www.broward.org/Library/MyLibraryOnline/Pages/TutoringPrograms.aspx>.

¹⁴ In addition to online databases specialized for K-12 students, libraries also provide access to databases for higher education and career development, as well as specialized business databases. See, for example, Jon Chavez (April 26, 2015). *Library card is key business tool as firm utilize resource-rich, free system* [sic]. Available at <http://www.toledoblade.com/Retail/2015/04/26/Library-card-is-key-business-tool.html>.

Adaptive technology skills and tools are often essential for low-income individuals with disabilities to benefit from broadband access. There are many examples of innovative and inclusive services for individuals with disabilities offered by libraries that build specific digital skills in a supportive setting and allow people with disabilities to practice and experiment with technology that can be used with a home connection.

For example, the Adaptive Technology (AT) Program in DC Public Library's Center for Accessibility provides a variety of programs centered on increasing the digital skills of participants. The AT program hosts Tech Talk Tuesdays featuring accessible mobile device training, professional employment meet-ups, a maker meetup, and accessible game nights. Other programming includes Saturday Technology Training Sessions featuring vendor-lead training and a job club.¹⁵ On the other coast, Seattle Public Library offers services to blind/low vision and Deaf/hard of hearing patrons through their Library Equal Access Program (LEAP). In addition to providing adaptive technology on library computers, LEAP hosts drop-in assistive technology training labs twice a month.¹⁶

The Library of Congress supports the National Library Service for the Blind and Physically Handicapped (NLS) that administers services to eligible borrowers (e.g., individuals with print disabilities) members of the disability community through a national network of cooperating libraries. Though their services are focused on providing print materials in more accessible formats, NLS has a well-established network of outreach to individuals with disabilities that could be used as a pipeline of communication to ensure that eligible consumers in the disability community are aware of the opportunities that Lifeline provides.

These library-based programs are an important contribution for connecting the disability

¹⁵ See <http://dclibrary.org/services/accessibility>.

¹⁶ See <http://www.spl.org/audiences/library-equal-access-program-%28leap%29>.

community, and could be even more effective if the low-income disability community was ensured affordable home broadband access. We support the Commission as it takes steps to ensure that all people can cross the bridge to become effective broadband users.

IV. Service standards must be tied to evolving marketplace conditions and functional requirements

Consistent with our positions in the Connect America Fund (CAF) and E-rate proceedings, we encourage the Commission to consider not only the current needs of households, but to also anticipate to the extent feasible, future trends in technology (applications, as well as devices) and commit to routine review of any service standards and subsidies established.

As the Commission considers minimum standards for broadband service through Lifeline, ALA encourages the Commission to focus on functional (rather than technical) requirements and scalability that keeps pace with technology innovation. We echo the sentiments expressed by Chairman Wheeler that it is not uncommon for a middle- or upper-income household to have numerous devices connected to the internet so that a 10 Mbps connection quickly reaches the saturation point.¹⁷ For example, related to the homework gap, bandwidth capacity standards must be sufficient to upload homework assignments that increasingly include multimedia, as well as to take advantage of interactive and real-time distance learning opportunities and a full range of increasingly complex applications.¹⁸ Any standard adopted in this or a future proceeding must be robust enough so that low-income consumers can meet diverse online needs.

Education, employment, and healthcare trends demand robust broadband connectivity

High school students working at home often are not just typing a paper and attaching it to

¹⁷ See the remarks of Chairman Tom Wheeler, “The Facts and Future of Broadband Competition” 1776 Headquarters, Washington, D.C. September 4, 2014. Available at https://apps.fcc.gov/edocs_public/attachmatch/DOC-329161A1.pdf.

¹⁸ See, for example, “Letter from The Leadership Conference on Civil and Human Rights,” to Chairman Wheeler, Chairman, FCC, WC Docket No. 11-42 (filed June 10, 2015). Principle 2: Excellence calling for Lifeline to support internet capacity “to enable people who use it to perform a full range of online activities.” Available at <http://apps.fcc.gov/ecfs/document/view?id=60001077579>.

an email. Increasingly, they are embedding video in an online presentation that needs to be uploaded to a school platform while Skyping with their project team to decide which photo editing software works best for the presentation. A middle school student may be live-chatting with an online homework tutor and sharing a math assignment via an online workspace to receive immediate feedback on a sticky word problem. Even the youngest students are adding written work or uploading videos to classroom blogs.

Beyond student learning, libraries report their patrons accessing online professional certification testing both via library computers and remotely through library employment databases or training services. In other instances, would-be employees use Skype for a remote interview, which understandably requires a reliable and robust connection, and a home-based worker routinely uploads large video files using the library's connection as his home connection is inadequate.

As the Commission notes, the field of telehealth is an emergent high-end and life-changing use of broadband connectivity. Libraries assist patrons with healthcare needs, typically in providing access to high-quality health information resources, but also increasingly by connecting patrons with healthcare professionals via teleconference, uploading x-rays or MRI images, or enabling real-time health monitoring data.¹⁹ People in rural America and on tribal lands, veterans and seniors aging in place, and those without reliable access transportation all face significant barriers to meeting their medical needs. Telehealth holds great potential for improving access to healthcare for disadvantaged populations and a compelling argument for including broadband support in Lifeline.

All of these examples presume an internet connection robust enough that the end user is

¹⁹ See, for example, ALA Comments, WC Docket No. 13-184 (April 7, 2014) at page 2. Available at <http://apps.fcc.gov/ecfs/document/view?id=7521097243>.

able to complete the task without buffering or timing out because of inadequate speeds.²⁰ As example of the rapid change in what constitutes broadband in recent years, the Commission upgraded its own definition of fixed broadband to 25/3 Mbps (download/upload speeds) and recently required CAF recipients to provide 10/1 Mbps service in areas that by the nature of the program are the most challenging to serve.²¹ In the recent E-rate modernization proceeding, the Commission adopted goals for broadband capacity that assume future growth for libraries and schools.²² Such goals show foresight on the part of the Commission, and ALA suggests the Commission could find an analogous metric that supports the current needs of the Lifeline community while ensuring the program can meet future needs.

Another example demonstrating the need for flexibility and routine updates in any standard adopted by the Commission can be found in the evolution of the Comcast Internet Essentials program, which also was created to serve low-income consumers. The Internet Essentials program was launched in 2011 with a service offering of 1 Mbps, which was upgraded in 2012 to 3 Mbps, and in 2013 to 5 Mbps. Just this month, Comcast announced it would offer 10/1 Mbps service AND provide a home WiFi router at the same subscription cost—\$9.95.²³ We also note the recent obligation of the AT&T and DIRECTV merger requires AT&T to offer service to low-income consumers where it is available of 10 Mbps for a monthly fee of \$10.²⁴ We

²⁰ See “Broadband Quality in Public Libraries: Speed Test Highlights” (April 2015) at page 4. Available at http://www.ala.org/offices/sites/ala.org/offices/files/content/Speed_Test_FINAL_0.pdf.

²¹ See footnote 13 for a reference to the recent Commission actions related to setting a goal for internet speeds. Available at https://apps.fcc.gov/edocs_public/attachmatch/FCC-15-71A1.pdf. See *Report and Order*, WC Docket No. 10-90 WC Docket No. 14-58 WC Docket No. 14-192 at 15. Available at https://apps.fcc.gov/edocs_public/attachmatch/FCC-14-190A1.pdf. See also the remarks of Chairman Tom Wheeler “The Facts and Future of Broadband Competition” 1776 Headquarters, Washington, D.C. September 4, 2014. Available at https://apps.fcc.gov/edocs_public/attachmatch/DOC-329161A1.pdf.

²² See *FCC Summary of the E-rate Modernization Order*. Available at <https://www.fcc.gov/page/summary-e-rate-modernization-order>.

²³ See “Internet Essentials Doubles Speeds, Adds Free Wi-Fi to Further Close Digital Divide” (August 4, 2015). Available at <http://corporate.comcast.com/comcast-voices/comcast-redoubles-attack-on-the-digital-divide-with-internet-essentials-program>.

²⁴ See *In the Matter of Applications of AT&T and DIRECTV* “Memorandum Opinion and Order,” MB Docket No.

should expect nothing less from the Lifeline program.

According to the Low-Income Broadband Pilot staff report, participating consumers were most likely to select a mid-range service, suggesting that they were seeking the greatest capacity possible for a cost they could afford.²⁵ We recognize that a balance must be found between the cost to the provider for offering high-capacity fixed or mobile broadband and the subsidy Lifeline recipients can receive. A requirement to offer a minimum level of service should not automatically exclude providers (especially in remote rural or hard to reach communities) from participating in the Lifeline program, nor should the Commission unrealistically expect that most low-income Americans can afford to cover costs beyond the subsidy. Either of these scenarios would defeat the goal of increasing home broadband adoption.

At the same time, we caution the Commission against adopting a broadband (or voice) standard for the Lifeline program that inadvertently further divides those households that can afford to connect from those that cannot. ALA agrees “the Commission needs a mechanism to ensure minimum service levels we propose to adopt stay relevant over time” and suggest this could be done when it evaluates its definition of broadband as part of its annual review of broadband deployment.²⁶ Ideally, this record will help to inform the development of a formula or index that would link consumer market costs and preferences for phone, mobile data and fixed wireline broadband speeds to Lifeline standards to simplify and speed program updates (similar, for instance, to the consumer price index to measure and reflect changes in the market).

14-90 (July 24, 2015) at VI. 2(a). Available at https://apps.fcc.gov/edocs_public/attachmatch/FCC-15-94A1.pdf.

²⁵ See Wireline Competition Bureau “Low-Income Broadband Pilot staff report.” WC Docket No. 11-42 May 22, 2014. Available at https://apps.fcc.gov/edocs_public/attachmatch/DA-15-624A1.pdf.

²⁶ See “Archive of Released Broadband Progress Notices of Inquiry” Available at <https://www.fcc.gov/encyclopedia/archive-released-broadband-progress-notices-inquiry>. See also the “2015 Broadband Progress Report,” “Section 706 of the Telecommunications Act of 1996 requires the FCC to report annually on whether broadband “is being deployed to all Americans in a reasonable and timely fashion,” and to take “immediate action” if it is not.” Available at <https://www.fcc.gov/reports/2015-broadband-progress-report>.

V. Increased pool of choices benefits applicants

As we consider the questions raised in the Lifeline FNPRM, we respectfully suggest that there are analogies that can be drawn from the history of the E-rate program and the decisions made during recent modernization efforts.

First, we appreciate the Commission's efforts to increase competition in order to lower broadband costs in recent proceedings.²⁷ As the Commission determines how to increase consumer choice in the Lifeline program, ALA reiterates its support for increasing competition but also recognizes that this must be balanced with making it easy for new entrants into the market while not unintentionally discouraging entrants from participating because of specific requirements or hurdles to providing service. Within the E-rate program we note that while the Commission increased the variety of eligible service providers it also increased the types of services that are eligible (e.g., equalizing the treatment of dark and lit fiber, allowing for self-provisioning). It made a concerted effort to address the barriers of smaller, more vulnerable applicants (e.g., allowing eligibility of managed WiFi services, eliminated the competitive bidding requirement for commercially available low-cost broadband) and eased the costs for providers and applicants alike regarding special construction (e.g., waived the amortization requirement, created a deferred payment option, and provided up to a 10% match for state-provided construction funds with additional eligibility for tribal libraries and schools).²⁸ These efforts to increase options and capacity building for E-rate applicants may find analogous application in the Lifeline program.

²⁷ See, for example, FCC granting petitions from Wilson (14-115) and Chattanooga (14-116) to pre-empt laws restricting community broadband in their respective states. Available at <https://www.fcc.gov/document/fcc-preempts-laws-restricting-community-broadband-nctn>.

²⁸ See *FCC Sixth Report and Order*, CC Docket No. 02-6 and GN Docket No. 09-51 (September 23, 2010). Available at https://apps.fcc.gov/edocs_public/attachmatch/FCC-10-175A1.pdf. See also FCC Summary of the E-rate Modernization Order. Available at <https://www.fcc.gov/page/summary-e-rate-modernization-order>. See also FCC Summary of the Second E-rate Modernization Order. Available at <https://www.fcc.gov/page/summary-second-e-rate-modernization-order>.

Creating a mechanism that eases the burden on providers to become eligible telecommunications carriers (ETCs) in the Lifeline program should yield a greater pool of interested participants, thereby increasing choices for Lifeline recipients. Additionally, establishing third-party verification should accomplish two goals: removing the burden from ETCs to verify and maintain records of eligibility and likely simplifying the application process for Lifeline recipients.

Second, related to establishing a permanent subsidy amount and a program budget at this dynamic time of program change, we bring attention to the genesis of the E-rate program when a budget was established based on usage at the inception of the program with no mechanism for adapting for technology advances or increased consumer (e.g., library and school applicants) demand. The result was that demand almost immediately outstripped available funding, and libraries and schools were unable to upgrade their broadband capacity using the very program initiated to support their needs for advanced telecommunications and information services.

We are concerned that the proposed \$9.25 subsidy is not adequate to support both needed telephone and broadband costs, particularly when limited to one subsidy per household. We also fear the Commission will find itself in the same predicament for Lifeline-eligible consumers as it did for E-rate applicants if it locks in a budget at the same time it is making significant program changes, such that it is unable to fully support all eligible recipients and thus falling short of its statutory obligation.

VI. Leverage Libraries to Close Access Gaps

Little doubt remains that broadband is the linchpin that can provide great opportunity to anyone who has access and the skills to utilize the connection. This is evidenced by numerous proceedings at the FCC, as well as in agencies across the federal government, most recently with

the launch of the Broadband Opportunity Council seeking to identify best practices for broadband deployment and adoption²⁹ and the ConnectHome initiative through the Department of Housing and Urban Development, focusing on 28 local demonstration projects that will bring high-capacity broadband and resources to support adoption to public housing residents.³⁰

Affordable access is clearly an important starting place to bringing everyone—regardless of geographical location, economic, status, or skill set—online. The increasing array of and demand for technology training classes and available technologies for patron use at the library stands as testimony to the additional support many would-be adopters need to gain confidence and skills to fully benefit from having a home connection.³¹

The Commission correctly acknowledges that the issues related to bridging the homework gap are greater than the current Lifeline proceeding can address without the coordinated efforts and commitment of many different stakeholders.³² Libraries provide a consistent resource in communities across the country and have programs and services that help bridge the lack of home broadband access and use.

Within the context of connecting Lifeline eligible families and individuals, we describe three models where libraries can help the Commission further its goals with the Lifeline program and its obligation under the universal service fund.

Check out the internet at the library

As the Commission notes, public libraries have begun to loan personal WiFi hotspot

²⁹See NTIA's Broadband Opportunity Council program. Available at <http://www.ntia.doc.gov/category/broadband-opportunity-council>.

³⁰See HUD's ConnectHome initiative. Available at <http://connecthome.hud.gov/>.

³¹See 2013 Digital Inclusion Survey, figure 33. Available at <http://digitalinclusion.umd.edu/sites/default/files/uploads/2013DigitalInclusionNationalReport.pdf>.

³²See FNPRM at 22, referencing closing the "homework gap." "We recognize that no one program or entity can solve this problem on its own and what is needed is many different organizations, vendors, and communities working together to address this problem. We therefore seek creative solutions to addressing this gap."

devices to patrons.³³ Libraries in communities of all sizes recognize that extending access into the home is a natural complement to providing internet access in the library. While the long-term goal of including broadband support through Lifeline is to ensure all low-income individuals can secure a home connection, we anticipate there will be a continued need for additional interventions as not every eligible low-income person will subscribe to home internet access—at least for some time to come. For these individuals, the library can bridge the gap by lending a WiFi device and continue its role of providing extra technical support (e.g., providing digital literacy classes and one-on-one support as people gain skills).

The lending pilot in Washington County, Maine, for example, was initiated to build on the learning from the program through New York Public Library.³⁴ The Maine pilot in turn has generated further interest in understanding the impact of WiFi lending on addressing the needs of students and their families.³⁵ These programs are an important step in pulling together resources and developing creative solutions to the lack of home internet access.

Establishing eligibility to receive a WiFi device

In the context of the Lifeline program, there are questions we are confident can be addressed through decisions the Commission is weighing related to a third-party verification

³³ New York Public Library and Chicago Public Library are two of the larger programs but a number of other programs exist. For example, Saint Paul Public Library launched a Borrow the Internet program and included a Borrow the Internet program with the Saint Paul Public Schools. To support students using iPads, the library is loaning hotspots to 100 Saint Paul Public Schools students for use this school year. <http://thefriends.org/blog/2014/10/14/saint-paul-public-library-wins-knight-green-line-challenge/>; Spring Hill Public Library (TN) launched its hotspot lending program in December 2014. <http://www.springhilltn.org/DocumentCenter/View/1112>; San Mateo County Library launched its hotspot program working with Mobile Beacon in April 2015 <http://www.prnewswire.com/news-releases/mobile-beacon-and-san-mateo-county-library-announce-the-largest-library-internet-lending-pilot-in-california-300067717.html>.

³⁴ See Check Out the Internet Project. Available at http://www.maine.gov/msl/lib/grant_projects/washington_county_wifi_grant.shtml. See also Axiom Technologies press release. Available at <http://connectwithaxiom.com/2015/07/axiom-technologies-and-maine-state-library-aim-to-deploy-67-hotspots-to-5-washington-county-libraries/>

³⁵ See “The Digital Learning and Equity Act of 2015,” 114th Cong (2015). Available at <http://www.king.senate.gov/download/?id=4743E157-EFA6-4671-94BC-E21E28A438F9&inline=file>. See also the press statement of Senator Angus King (I-ME), co-sponsor of the bill with Senator Shelley Moore-Capito (R-W.V.). Available at <http://www.king.senate.gov/newsroom/press-releases/king-capito-introduce-bill-to-give-low-income-rural-students-educational-tools-needed-to-succeed>.

system (Section B) and investigating options for verifying low-income families with school age children for addressing the “homework gap.”

ALA suggests that once an individual is verified through a third party as eligible for Lifeline services, that verification could be used in the library as a mechanism to verify that the person requesting a Lifeline-supported WiFi device is eligible to check it out. Alternatively, should the Commission not elect to establish a third-party verification system, the library could establish the level of poverty of its service area through a formula based on available demographic data from the Institute for Museum and Library Services (IMLS)³⁶ or via the Community Eligibility Provision (CEP).

ALA respectfully encourages the Commission to allow a library seeking to provide WiFi devices to Lifeline-eligible patrons to receive support for the connectivity of those devices based on a formula developed using one of the aforementioned options. Using IMLS geolocated library data or CEP eligibility criteria, the Commission could establish a formula to determine eligibility based on community demographics of the library’s service area.

Libraries are a trusted community resource for outreach programs

Libraries also can play a role in helping reach potential Lifeline-eligible consumers and make them made aware of the opportunities in the program (e.g., ¶¶26, 93, and 102). Libraries often serve as a conduit for providing information about government programs and services and routinely help patrons navigate government websites to find information and secure services (e.g., veteran’s benefits, immigration and citizenship services, and FEMA benefits). Virtually all libraries (98%) report helping patrons complete online government forms and about two-thirds

³⁶ See annual Public Libraries in the United States Survey, data files and reports available at <http://www.ims.gov/research/public-libraries-in-the-united-states-survey.aspx>.

provide help to access government programs and services.³⁷

For the purposes of providing information on the Lifeline program, libraries can help facilitate local outreach and stand ready to take on that role. We respectfully request, however, that any outreach initiatives include ample training time for library staff so they are fully equipped to provide up-to-date and accurate information. Additionally, successful programs ensure any resources developed for outreach are customizable so that local libraries can provide their own tailored resources that address needs specific to local demographics (e.g., libraries may elect to focus materials for non-English speakers, older adults, families with children, or veterans).

Establish a Lifeline Navigator program using libraries

Building on libraries as a natural connector for outreach and educational programs, libraries also actively seek partnerships to enhance or expand programming and services for their patrons.³⁸ Serving as a site for outreach and enrollment in the Lifeline program could be a natural extension for libraries serving a large percentage of low-income residents.

For example, libraries could provide space and technical support for a “Lifeline Navigator” to set up during specific “office hours” to enroll consumers in Lifeline. The library could advertise the upcoming (or ongoing) site times through its regular outreach channels. Additionally through its routine services, the library could provide access to general information about the Lifeline program and eligible services, public computers, and training on setting up an email account. A relevant example of libraries supporting patron access to a specific government

³⁷ See 2013 Digital Inclusion Survey, figure 58. Available at <http://digitalinclusion.umd.edu/sites/default/files/uploads/2013DigitalInclusionNationalReport.pdf>.

³⁸ See 2013 Digital Inclusion Survey, figure 53 and 63. Government agencies partnered with libraries to assist patrons to: access and use government programs and services (e.g., Medicare, Social Security, InfoPass) (55.1 percent); host community engagement events (e.g., candidate forums, community conversations) (39.1 percent); and complete online government forms (e.g., social services, immigration, tax) (36.9 percent). Available at <http://digitalinclusion.umd.edu/sites/default/files/uploads/2013DigitalInclusionNationalReport.pdf>.

program can be found in recent efforts to expand enrollment in health insurance exchanges.³⁹

Libraries routinely design programs specific to different community needs. It is conceivable that a library with a Lifeline enrollment site, for instance, would create a program for families with young children to work with parents and caregivers to learn how to use technology appropriately and effectively with young children.⁴⁰ Another library might develop a training program specific to older adults learning to use Facebook and other social media platforms to connect with family and friends to encourage home adoption. Regardless of the form it takes, using libraries to connect Lifeline-eligible consumers opens the door for additional support and programs that can help bridge the variety of gaps these often vulnerable populations face.

ALA welcomes the opportunity to work with the Commission to further explore these approaches to improving access options for Lifeline eligible families and individuals.

VII. Conclusion

As the country continues to move toward an increasingly online society, digital opportunity must be ubiquitous. The Commission can and should address the cost barrier to home broadband adoption by supporting standalone broadband connectivity for low-income individuals. Funding should be adequate to support all eligible households, and service levels should provide sufficient capacity to perform a full range on online activities. The program should support consumer choice—including portability of Lifeline benefits—and competition among providers. Finally, the Commission should enable innovation and flexibility throughout the program so as

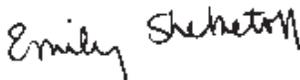
³⁹ See for example the Topeka & Shawnee Public Library Health Insurance Marketplace Information webpage. Available at <http://tsopl.org/health/health-insurance-marketplace-information>. See also the DC Public Library Affordable Care Act webpage. Available at <http://dclibrary.org/healthcare>.

⁴⁰ See for example the Association for Library Service to Children's white paper, *Media Mentorship in Libraries Serving Youth* (March 2015). Available at http://www.ala.org/alsc/sites/ala.org.alsc/files/content/2015%20ALSC%20White%20Paper_FINAL.pdf. See also <http://www.ala.org/alsc/mediamentorship> for more information on librarians serving as media mentors.

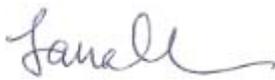
not to perpetuate digital differences between “haves” and “have nots” in the digital age. Within and beyond the Lifeline program, the Commission has a vital role to play not only in advancing affordable access to high-capacity broadband, but also increasing broadband adoption and use.

ALA encourages the Commission to act without delay in ensuring that low-income consumers have access to a robust home broadband internet connection.

Respectfully submitted,



Emily Sheketoff
Executive Director
ALA Washington Office



Larra Clark
Deputy Director
Office for Information
Technology Policy
ALA Washington Office



Marijke Visser
Associate Director
Office for Information
Technology Policy
ALA Washington Office