

# ALA American Library Association

April 4, 2016

Ms. Lisa Hone  
Associate Bureau Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12 Street S.W.  
Washington, D.C. 20554

*RE: Request Extension of the 2016 E-rate Application Window*

Dear Ms. Hone:

The American Library Association (ALA) is the world's oldest and largest library association—representing over 58,000 members, many of which work in our nation's 16,500 public libraries. ALA has been a strong supporter of the E-rate program since its inception and it is a critical component helping to ensure our libraries have the network broadband capacity they need at affordable prices.

As you know, we have commented on innumerable Federal Communication Commission's (FCC) proceedings, including the recent Modernization reforms. However, we have not commented on the need to extend the Form 471 application filing window as we are now doing. We are cognizant of the fact that implementing the many changes to the E-rate program has been a monumental task and we are very appreciative of the continued outreach from the Schools and Libraries Division (SLD) at USAC. We are particularly appreciative of the ongoing calls with SLD staff and frequent information shared via the weekly newsletter that have focused on library concerns. However, issues that have arisen related to the 2016 application process warrant our request. Specifically, the introduction of the E-rate Productivity Center (EPC) portal into all aspects of the 2016 application process has resulted in a level of complexity and confusion that has caused considerable angst in the library community. As a result, we are now less than four weeks from the close of the Form 471 filing window and our libraries continue to report issues that preclude filing of their 471 Forms. For example, here are several issues causing application problems:

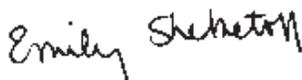
- Thousands of libraries in EPC were misclassified as “library systems” instead of just “libraries.” The Form 471 cannot be filed until these misclassifications are corrected. Many library requests to make the needed corrections are still being processed by USAC's Client Services Bureau (CSB).
- In some instances a library was linked in EPC to the wrong school district. Like the misclassification issue, this problem must be corrected in order for the library to file the Form 471.

- In some instances the school district linked to a library has not completed or has issues with its student enrollment and free/reduced lunch eligibility numbers in its EPC profile. When this occurs the library must wait until the district updates/corrects these numbers before the library's Form 471 can be submitted. This issue is particularly vexing because libraries are totally at the mercy of actions needed by their associated school districts.
- Many libraries are part of regional and state consortium applications. Consortium filers report many issues within EPC that are preventing submission of their 471 forms.
- Many State E-rate coordinators are trying to correct various errors in their respective State Entity Reports. But doing so will take considerable time and effort.

For the above and a host of other reasons, we respectfully request that the deadline for the Form 471 application window be extended at least three weeks, to May 20, 2016. While we hope that these additional three weeks are ample time to address the issues that are preventing libraries from submitting their 471 forms, we want to ensure that solutions to these issues are fully vetted and understand that more time may be necessary. In addition, *we think that no application should be denied for problems or issues in EPC over which the applicant has little or no control.* Thus, it is essential that USAC implement a very liberal "hold harmless" policy as the Program Integrity Assurance (PIA) staff reviews 2016 applications. We believe such a policy is necessary to avoid possible large increases in application denials that will be severely detrimental to the program and will be of benefit to no one.

Thank you for listening to our concerns.

Sincerely,



Emily Sheketoff  
Executive Director  
ALA Washington Office



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

cc

Aaron Garza  
Chris Henderson  
Mel Blackwell