

The Honorable William E. Kennard
Chairman
Federal Communications Commission
1919 M Street, Northwest
Washington, D.C. 20554

Re: Public Notice, CC Docket No. 96-45 [DA 1212]

Dear Chairman Kennard:

On behalf of Florida public libraries I appreciate this opportunity to comment in response to the Federal Communication Commission's June 23, 1999 Request for Comment regarding a possible requirement that applicants for E-Rate benefits have acceptable use policies governing public Internet access. I endorse the Comments submitted by the American Library Association (ALA).

The Division of Library and Information Services has worked closely with Florida public libraries in developing public Internet service and Internet Service Policies. Based on this extensive experience, I believe that the ALA's arguments and recommendations are sound and provide a reasonable approach to dealing with the major public policy issues related to the provision of public library Internet services.

Florida Public libraries have worked hard to provide Internet service to the communities they serve and we are proud of their success in responding to multitude of challenges associated with this task. Today approximately 97% of all Florida public libraries are providing these services and the E-Rate has provided invaluable assistance. Without the E-Rate, many libraries, particularly those serving less affluent communities, could not afford the costly telecommunications services needed to provide public Internet services.

Virtually all Florida public libraries have developed policies governing public Internet access. Through their local service and policy development processes, libraries have worked with their communities and the local officials governing library operations to develop services and policies that are uniquely suited to their communities' needs. Therefore I strongly endorse the ALA's position that if the Commission decides to impose policy requirements that libraries be given maximum flexibility to use their local policy development processes.

Based on our experience, we agree with ALA that if a policy requirement is enacted, that self-certification by the applicant would be the best way to insure compliance. The array of Internet service delivery methods and policies used by libraries is very diverse and is evolving daily and the legal context of First Amendment issues is far from settled. Because of these reasons, and our belief that policy development is best left to local communities, we do not believe that it is appropriate or feasible to develop a "one-size-fits-all" approach as would be necessary for a formal review process.

Thank you for this opportunity to share these views.

Sincerely,

Barratt Wilkins
Director