

Dear FCC:

Please consider the following comments in connection with your implementation of the Children's Internet Protection Act, Public Law 106-554.

1. Please consider Year 4 as a "grace period" in which applicants only need to state that they are "undertaking such actions" as required by the law.
2. Please construe the Applicability clause narrowly, so that it does not apply to plain old telephone service (POTS).
3. A number of E-Rate recipients (library cooperatives, consortia, etc.) do not directly serve the public, and are not in the business of supplying direct public access to the Internet. These recipients should not be required to conform to the act for eligible services at their office locations.
4. Finally (and perhaps most importantly) please allow that cooperatives and consortia should not be required to guarantee the ongoing compliance of all consortia members. While they should be required to report instances of non-compliance that they are aware of, they should not be held accountable for instances of non-compliance when proper certification has been provided by a specific library. Further, if a member of a consortia should be found to be in non-compliance then the loss of discount (or requirements to repay previous discounts) should affect only that single entity and not the entire consortia.

Respectfully submitted,

Dan Siebersma, Director
Lakeland Library Cooperative

4138 3 Mile Rd. NW
Grand Rapids, MI 49544

(616) 559-5253