

April 3, 2002

RE: Notice of Proposed Rulemaking (NPRM) in CC Docket No. 02-6 FCC 02-8 released on January 25, 2002; Federal Register, Vol.67, No.33, Proposed Rules FEDERAL COMMUNICATIONS COMMISSION (FCC) 47 CFR Part 54 [CC Docket No. 02-6, FCC 02-8] Schools and Libraries Universal Service Support Mechanism 67 FR 7327

TO: FCC

FROM: Charles R. McClure
Ph. D. Francis Eppes Professor and Director, Information Institute

SUBJECT: Comments: NPRM for CC Docket No. 02-6

We submit the following comments regarding the NPRM, CC Docket No. 02-6. These comments should be considered in future rule making regarding the administration of the E-rate program. The comments offered here are only a summary of more detailed findings and recommendations that resulted from a study Public Library Internet Services and the Digital Divide conducted by the Information Use Management and Policy Institute at Florida State University. The study was published by the Chief Officers of State Library Agencies and Funded by the U.S. Institute for Museum and Library Services. The authors of the report are Dr. Charles R. McClure, Francis Eppes Professor and Director of the Institute at Florida State University; Joe Ryan, Senior Research Associate; and John Carlo Bertot, Associate Professor and Associate Director of the Institute at Florida State University.

The study was conducted beginning February 2001 and ended January 31, 2002. The focus of the study was the Role and Impacts from Selected External Funding Sources on public libraries and included "E-rate" as one of the key external funding sources. The report is available on the Institute's website at: <http://www.ii.fsu.edu/publications.html>. Listed below are a selection of the key findings and recommendations that should be considered in this NPRM.

E-rate funding is essential to local public library operations, but needs fine-tuning:

- Simplify the application process. Most library managers found the process overly cumbersome and unnecessarily complicated and unending.
- Increase efforts to get clear and accurate information to the library community. Improve involvement of state libraries, consortia, and library systems to achieve this.
- Increase public library participation; in particular, adjust library eligibility requirements to participate in internal wiring and network equipment portions of the program.
- Find a way to fund support for libraries who lack the staff, the time, or the technical expertise to successfully complete the application process.
- Participants in the study indicated a need for the E-rate program to allow a different approach, including the application process and criteria, for public libraries than for public schools. Public libraries differ from public schools in areas such as mission, who they serve, hours of operation, and overall funding-related issues. It is inappropriate to treat them equally in the application, review, and award process.

Importance of leveraging E-rate awards for external support

- E-rate awards were effectively leveraged to obtain other funding sources.

A vast number of public libraries were able to obtain and upgrade information technology that would have been unavailable to them without E-rate funding.

--With the assistance of state libraries, funds were leveraged to create an information and technology infrastructure capable of delivering a sustained service rather than a piece of equipment to the public.

--Future E-rate funding needs to be flexibly designed to promote leveraging.

A model of this is the LSTA's Grants to State Library Agencies.

--Future E-rate procedures need to engage the state libraries as partners to coordinate leveraging and to support programmatic goals to have successful state or national reach.

Support for equipment purchase was not enough

--Public library managers need greater flexibility in obtaining support for a range of internet and telecommunications equipment from the E-rate program.

--Greater flexibility in administrative procedures for the E-rate program need to be available to rework library technology; collections and their organization; the types of public services offered; public training; promotions of these activities; and to increase staff or change their function and training; and with financing, managing, and the evaluation of the new service.

Coordination with the State Library is essential

--State library coordination with administering the E-rate program is necessary to influence or nudge funding for public library Internet services in the appropriate directions that support statewide plans.

--Consortia and regional library systems also played significant roles in assisting local libraries apply for and use E-rate monies -- particularly when the State Libraries became overwhelmed.

--Statewide coordination in E-rate application and use of technology is necessary for leveraging external funding and cannot work well without early State library involvement and support for that involvement.

--E-rate administrative and programmatic design, regulations, and procedures need to be tailored to fit the needs of individual libraries.

Training

--The E-rate program needs to be expanded such that it supports training and education in how to use and apply the technologies and related equipment obtained via the program.

Increasing E-rate program flexibility

--Numerous factors (national, statewide, and local) combine to shape the overall effectiveness of programs such as E-rate; these are poorly considered in the existing E-rate administrative procedures.

--Local governmental regulations, for example, oftentimes preclude administrative procedures that are required as part of the E-rate application and processing requirements.

Statistics and statistical reporting

--The statistics that are reported to describe the E-rate program can be significantly improved so that the public library community and policy makers can better understand the uses and impacts of the program.

--The databases that are currently in use that collect and report E-rate

awards, type of request, etc., need to be redesigned to include FSCS library IDs (as example) to be more useful to the public library community and policy makers.

Additional detail with specific recommendations can be found in the final report of the study located at <http://www.ii.fsu.edu/publications.html>. Please feel free to contact me if you require additional information or wish to discuss these or other recommendations.

Sincerely,

Charles R. McClure, Director
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