

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

In the Matter of)	
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Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
)	WC Docket No. 12-23
Advancing Broadband Availability Through Digital Literacy Training)	
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Advancing Broadband Availability for Low-Income Americans through Digital Literacy Training

The Idaho Commission for Libraries (ICfL) is the state library agency charged with providing services and programs that build the capacity of libraries to better serve their clientele, and it is the designated Idaho recipient of funding from the Institute of Museum and Library Services (IMLS). ICfL was also a recipient of a round 2 (2010) Broadband Technology Opportunities Program (BTOP) grant from NTIA for Public Computer Centers (PCCs). Through our BTOP project with Idaho public libraries and IMLS’ work on digital inclusion, ICfL has gained increased awareness of the need for digital literacy training and the great potential we have to be a major provider of such training in Idaho.

Summary

ICfL appreciates the opportunity to comment on this important issue. We agree with and support the filing from the American Library Association, including its six main points:

- Digital literacy is vital to ensuring equal opportunity in a knowledge economy;
- Public libraries are ideally positioned to support digital literacy training;
- Public libraries—even those now doing digital literacy programs—need additional resources to meet demand for digital literacy training;
- Any program designed to address digital literacy must have the flexibility to meet community needs and build library capacity;

- It is appropriate to use savings from the FCC’s Universal Service Fund Lifeline program reforms to support digital literacy training and broadband adoption for low-income people; and
- Funding for digital literacy training through libraries should be separate and distinct from the E-rate program and should be administered thusly.

ICfL comments will focus on:

- Ability to build on BTOP experiences
- Key recommendations for program administration
 - State-wide consortium application
 - Match requirement
- Need for program flexibility
 - Different needs for rural/urban/small/large libraries
 - Formal and informal classes
- Importance of E-rate for connectivity Idaho libraries, and the need to maintain the program as it was originally created

Discussion

- Ability to build on BTOP experiences

ICfL’s BTOP project upgraded computer and connectivity capacity in 55 (of 141) of the state’s least connected public library facilities. ICfL formed several strong partnerships as a result of the project, including the Idaho Department of Labor and the office of Adult Basic Education. Both agencies have regional offices to better serve our large, rural, and sparsely populated state. These regional offices are now working with the public libraries in their area to offer basic digital literacy training to the clientele they have in common. Just getting underway are digital literacy training opportunities in collaboration with the Idaho Office for Refugees, and digital literacy training for public library boards of trustees so they better understand the expanding roles of the library.

These BTOP experiences are laying the groundwork for ongoing digital literacy, adoption, and inclusion efforts that ICfL is incorporating in its new 5-year plan to be submitted to IMLS in June of this year.

- Key recommendations for program administration
 - State-wide consortium application: ICfL supports the option of a state-wide consortium application for digital literacy training funding. We have a good track record for working with public libraries collaboratively and with shared responsibility for success. A statewide application we develop with an advisory group allows the

local libraries to spend their limited staff time and other resources actually delivering the programs. According to Idaho's 2010 Public Library Statistics, the median of total library employees was 2.44 FTE.

- Match requirement: ICfL is concerned that the proposed match would discourage, if not prohibit, many Idaho libraries from applying. According to Idaho's 2010 Public Library Statistics, the median of local operating income was \$88,356, and the median of total collection expenditures was \$9,737.
- Need for program flexibility
 - Different needs for rural/urban/small/large libraries
 - Formal and informal classes

ICfL's experience is that one solution does not fit all libraries. According to Idaho's 2010 Public Library Statistics, Idaho has 7 public library jurisdictions that serve more than 50,000 people and 42 that serve fewer than 2,500. Our practice for most statewide programs is to provide a framework that local libraries can adapt to meet their local needs with the resources they can contribute, with staff training and technical assistance provided by ICfL.

Flexibility in the type of training offered is critical. For example, our BTOP project includes matching Summer Youth Corps participants with local libraries to act as digital literacy coaches for one-on-one help. A very successful pilot in the summer of 2011 led to twice as many libraries requesting digital literacy coaches for the coming summer. Other libraries have demonstrated success with more formal approaches.

- Importance of E-rate for connectivity for Idaho libraries, and the need to maintain the program as it was originally created

As a result of the BTOP project focus on broadband sustainability, in 2011 a record 90 of 141 Idaho public library outlets applied for and received funding commitments for a total of \$576,499. (Disbursements of the previous 5 years (FY06-FY10) totaled little more than that, \$595,922.) Discounts range from 40 to 90% of the cost of eligible services, with an average of 77%. With Internet connectivity up from an average of 1.5 Mbps to an average of 11 Mbps, Idaho libraries are unable to sustain this level of connectivity without E-rate support.

Conclusion

Thank you for the opportunity to comment on this FNPRM. ICfL recognizes the need to focus on digital literacy training in Idaho over the next 5 years to build on the achievements of our BTOP project. A statewide consortium application with little or no match, options for program flexibility depending on community needs, and ongoing E-rate discounts for the majority of Idaho libraries will greatly increase our capacity to meet that need.