

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

In the Matter of )  
Modernizing the E-rate )  
Program for Schools and Libraries )

WC Docket No. 13-184

**COMMENTS BY THE SCRANTON PUBLIC LIBRARY RELATED TO THE E-RATE 2.0  
NOTICE OF PROPOSED RULEMAKING**

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Description of Library: The Scranton Public Library, the headquarters of the Lackawanna County Library System, serves more than 200,000 residents and provides IT support and files E-Rate for seven member libraries. Free Internet access is provided at each location.

Summary: The Scranton Public Library would like to comment on some of the proposed changes to the E-Rate program. We are very concerned about the intent to focus on “high capacity” Internet access at the expense of more traditional services such as copper-based T1s and basic telephone service. We are concerned that the expense and physical challenges of deploying fiber to remote locations is not understood by those proposing this change. We have no objection to delivery methods such as fiber and solutions such as VOIP. In fact, we find them highly desirable, but paying for them would be a hardship for the library system unless installation costs were to be completely borne by E-Rate and the undiscounted portion of the monthly recurring charges would be no higher than what we are paying for the traditional services. In other words, we would require a higher E-rate discount for the monthly recurring costs to offset the higher costs that would come with the enhanced bandwidth.

We will now comment on specific portions of the NPRM:

1. Paragraph 65 states: “To support the goal of ensuring that schools and libraries have access to affordable high-capacity broadband, both to and within schools and libraries, we propose to update the E-rate program’s funding priorities, and seek comment on how to do so.” While we cannot find where it is stated specifically, it appears that “high capacity” is synonymous with fiber. If this is indeed true, it follows from there that Internet delivered through other means, such as bundled copper T-1s, would be deprioritized or not funded at all. Assuming all of the above assumptions are correct, E-Rate must then pay for the delivery of fiber to even the most isolated E-Rate eligible libraries. No library should be harmed financially because the cost of getting fiber to them is impossible or extremely expensive. If, for some libraries, copper remains the only cost-effective solution available, then copper should not be deprioritized.
2. Paragraph 74 states: “We seek comment on whether fiber deployment to schools and libraries is being slowed because applicants cannot afford to pay the non-discounted portion of deployment costs. “ This is absolutely true. In our area fiber cannot be obtained for bandwidths lesser than 10MEG. Most of the smaller libraries in our system operate at 3MEG and paying for 3MEG, even with a 63% aggregated discount, remains a challenge for the library system. Installation costs are also an impediment. For many rural libraries, the nearest fiber link may be many miles away and the cost of paying a vendor to run fiber to that isolated library can be very expensive. Our recent experience bringing cable TV / Internet into a new library building will serve to illustrate the infrastructure challenges that may be confronted when trying to deliver fiber to our libraries. A library moved into a new building that was just three miles from the old building. The new building is on a state route next to an on-ramp for Interstate 380. It is only seven miles from the City of Scranton. Due to the lack of existing infrastructure, it cost \$3500 and took three months to run the cable over a distance of about a mile from the nearest terminus. This was due to the need for the cable company to obtain required pole permits and overcome other construction hurdles. One can only speculate on the challenges and costs of getting fiber to this library or the thousands nationwide that are even more isolated.
3. Paragraph 102 states: “We also seek comment on how to treat support for Internet access services provided via cellular data plans, including air cards.” On our Bookmobile, air cards are the only way to provide an Internet connection so we can circulate materials to patrons. In addition, the library uses mobile devices to register for children and adults for programs that take place away from the library in places such as parks.
4. Paragraph 105 states: “We also seek comment on phasing out services that are used only for voice communications.” Despite the advent of the Internet, social media, and mobile technology, libraries still rely on standard phone service to communicate with library users. If E-Rate discounts for POTS were to disappear, it would cost the Lackawanna County Library System nearly \$9000 annually which means \$9000 fewer new books or E-Books and fewer computer upgrades. We are particularly opposed to

any change that favors VOIP over POTS unless E-Rate is willing to fully fund the deployment of the substantial bandwidth needed to accommodate VOIP.