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April 2, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Notice of Ex Parte Communication, WC Docket No. 13-184

Dear Secretary Dortch:

On March 31, 2014, Susan Benton, President and Chief Executive Officer of the Urban Libraries Council (“ULC”), Reed Hundt and the undersigned, representing ULC, along with John Windhausen, Executive Director of the Schools, Health & Libraries Broadband (“SHLB”) Coalition, met with the following individuals: Jon Wilkins and Dana Shafer of the Office of the Managing Director; Trent Harkrader, Lisa Hone and Patrick Halley of the Wireline Competition Bureau; Kate Dumouchel of the Telecommunications Access Policy Division; and Jonathan Chambers, Nick Alexander and Michael Steffen of the Office of Strategic Planning and Policy.

During the meeting, Ms. Benton provided an overview of ULC and its role in leading research initiatives aimed at providing new models and tools for enhancing the library’s impact on the community. She explained that ULC includes more than 100 library systems that collectively serve more than 100 million Americans. Ms. Benton and Mr. Beahn also provided an overview of the challenges and the importance of E-rate funding to libraries, which provide critical resources in serving the continuing educational needs of communities and assisting in the employment pursuits of community members.

Mr. Hundt asserted that the E-rate program must recognize the unique role of libraries in the broadband social landscape and reflect the structural differences

between libraries and schools. As the number one free public Internet access point in the U.S., Mr. Hundt said that libraries play a critical role for the 90 million adult Americans not currently in the workforce. These individuals cannot access broadband at work or through schools, and many either do not have broadband at home or do not have reliable access to broadband in a home. He further noted that more than 60% of libraries report that they are the only free public Internet access location in their communities. Mr. Hundt also explained that the Commission must account for the governance, structural and operational differences between schools and libraries. These differences include, among other things, different tax bases, funding sources, service populations, hours of operation, peak hours of broadband demand and funding mechanisms.

With regard to the questions posed by the Commission's recent public notice, Ms. Benton and Mr. Hundt asserted that the Commission should define a desired state of library access for high-speed circuits to each library building and internal wireless broadband connectivity. Mr. Hundt responded that the goal for libraries should be at least 4-5 Mbps downstream speed and 1 Mbps upstream for each WiFi user during peak hours, and at least 1 Gbps connection to nearly all of the 17,000 library buildings (extremely small libraries being the exception). He explained that, as a shared medium, Wi-Fi requires high-speed connection to the wireless local area network, and that libraries need high-speed connections to some public desktop computers. The Commission should not fund half measures or incremental improvements that fall short of the defined end state. This is consistent with Chairman Wheeler's goal of future-proofing America's libraries and is the best use of scarce funds.

In response to staff inquiries for data regarding library connectivity needs, Mr. Hundt suggested that, if the Commission believes that it lacks sufficient information regarding the current state of library connectivity, it could request that libraries provide this data in a statistically significant manner. Mr. Beahn noted that ULC hopes to submit the results of a voluntary survey of a number of its members in the near future on these issues. Mr. Hundt also suggested that the Commission has the ability to fund the diagnostic tests of Wi-Fi, desktop and building connectivity or it could seek foundation assistance.

To decide which applicants receive funding priority, Mr. Hundt, Ms. Benton and Mr. Beahn maintained that the Commission should obtain from each applicant library a report detailing a variety of information, including the number of average per hour users, current bandwidth per workstation and per marginal Wi-Fi user at peak hours, and the BLS-defined average income of the population in the served community. The FCC could then use this information to determine a quantifiable

measurement of need for each library. They said that funding should be prioritized according to this formulaic definition of need, so that a high-use, low bandwidth, low-income library would receive priority.

Lastly, Mr. Hundt reviewed a number of pilot programs that the Commission should consider funding. These include a library innovation fund from which libraries could obtain grants for innovative testbed projects, a regional request for procuring a fiber-Wi-Fi solution for all libraries in such region, the proposal put forth by the Digital Public Library of America for a national digital library platform and a diagnostic assessment on the current status of broadband, fixed line workstation and Wi-Fi connectivity in libraries.

On behalf of the SHLB Coalition, Mr. Windhausen indicated that the Coalition continues to work on a project to estimate the deployment cost of providing fiber to the remaining schools and libraries that do not have sufficient high-speed broadband connectivity.

Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/

John M. Beahn

Counsel to Urban Libraries Council