

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

In the Matter of)
Modernizing the E-Rate) WC Docket No. 13-184
Program for Schools and Libraries)

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

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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. For us the biggest challenge is that patron demand for bandwidth is always increasing, but we find it difficult to keep up because E-Rate procedures prevent us from responding quickly and because high bandwidth services are unavailable or very expensive at many of our locations. 100 MEG of bandwidth to all public libraries and schools is a laudable goal and would solve the problem, but given the infrastructure in place in many areas, much of it a legacy of the Bell monopoly, fixing it may require a national effort that goes beyond the scope of E-Rate. If E-Rate cannot deploy fiber to all libraries and schools in the country, E-Rate needs to be nimble enough to allow libraries and schools to quickly compensate for changes in bandwidth demands and funded in a way that allows libraries and schools to purchase sufficient bandwidth at a substantially reduced rate.

We will now comment on specific portions of the NPRM:

1. Paragraph 6 states: “Numerous commentators have identified support for internal connections as one of the program areas where modernization is most urgent and more important.” We do not view “internal connections” as an important component of E-Rate. We can usually find money for one-time expenditures of hardware and cabling. We believe the focus of E-Rate should be on Monthly Recurring Charges for broadband connectivity.
2. Paragraph 26 states: “...we seek comment on whether the Commission should undertake a limited initiative, within the existing priority one system, to incent deployment of high-capacity broadband connections to schools and libraries.” The answer is yes, but assuming “high-capacity broadband” means 100 MEG, such an endeavor cannot, by definition, be “limited.” 100 MEG cannot be delivered through copper phone lines which is all that is available in many rural areas. How do we encourage ISPs to run fiber to even the most rural and isolated libraries and schools? This would involve a massive overhaul of infrastructure that may be beyond the scope of the E-Rate program and be more akin to previous national efforts like Rural Electrification.
3. Paragraph 30 states: “...if the Commission makes some additional deployment support available to eligible schools and libraries that do not already have access to high-speed scalable connections available at reasonable prices, how do we identify those schools and libraries? Should we reply on the broadband speed targets identified by the Commission...?” Those targets are 100 MEG which would require the deployment of fiber. Ideally, there should be a national initiative to deploy fiber to even the most isolated libraries and schools. At current levels, a library likes ours will brag about going from 1.5 MEG to 3 MEG, but the 3 MEG will be insufficient one day after it is installed. This is how fast bandwidth needs are changing. Short of universal 100 MEG, E-Rate needs to be structured in a way wherein bandwidth can be scaled up very quickly as requirements change.
4. Paragraph 38 states: “...we seek additional comment on how best to minimize administrative burdens and overhead associated with applying for and receiving such support.” While the E-Rate process is arcane, the amount of time it requires is about the same as that spent on administering a general grant. However, the timetable is glacial. A 470 issued in the fall cannot go into effect until July 1st of the following year. Bandwidth needs can change quickly in a public library. While it may not be feasible from USAC’s perspective, a floating E-Rate calendar would be ideal. While the 470 should still be out for 28 days, you should be able to submit 471s any time after those 28 days and not have to wait for a “window.” In the system we are proposing, USAC would approve 471s within 8 weeks of receipt with service commencing within 4 weeks of receiving the

Funding Commitment Decision Letter. This would allow libraries and schools to respond quickly to changing bandwidth requirements.

5. Paragraph 40 mentions “the prospect of eliminating or reducing support for voice...” We have no problem with this if more aggressive discounts for Internet bandwidth compensate for reduced or no discounts for voice.