



CHIEF OFFICERS OF STATE LIBRARY AGENCIES
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Ann Joslin
State Librarian
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April 21, 2014

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State Librarian
Connecticut State Library

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

Treasurer
Sandra Treadway
Librarian of Virginia
Library of Virginia

Re: **Modernizing the E-rate Program for Schools and Libraries WC Docket No. 13-184**

Secretary
Wayne Onkst
State Librarian & Commissioner
Kentucky Department for Libraries
and Archives

Dear Secretary Dortch:

Director
Stacey Aldrich
State Librarian
Commonwealth Libraries of
Pennsylvania

COSLA (Chief Officers of State Library Agencies) is an independent organization of the state librarians of state library agencies (SLAs) which are responsible for statewide library development. COSLA's mission is to provide leadership on issues of common concern and national interest, to further state library agency relationships with the federal government and national organizations, and to initiate, maintain and support cooperative action for the improvement of library services.

Director
Martha Reld
State Librarian
Vermont Department of Libraries

State libraries are the primary agencies providing leadership, education and technology support to our nation's public libraries. As the organization representing state library agencies, **COSLA supports the comments of the American Library Association (ALA) on Modernizing the E-rate Program for schools and libraries.**

Immediate Past President
Lamar Veatch
State Librarian
Georgia Public Library Service

The E-rate Program provides critical support for digital learning and public access to online information through America's 16,415 public libraries. The Institute for Museum and Library Services recently concluded that more than 90% of libraries have used E-rate ([see April 16 blog post](#)). For this reason, COSLA welcomes the Federal Communications Commission's efforts to update the program and supports the American Library Association's (ALA) proposal to advance cost-efficient library network development via technical support enabled by state library agencies.

State library agencies provide critical communication links between federal policies, state and local telecommunications providers and local, independent library systems. We know that the FCC's interest is in improving library participation in and value from the E-rate program, as well as improving cost efficiencies and streamlined administration of the program overall. We also know that local library access to trained IT staff who can support network planning and broadband procurement is essential if libraries and the E-rate program are to achieve these goals. Unfortunately this kind of staffing is a luxury many American libraries do not have. In Montana, for example, Broadband Technology Opportunity Program grant funds were used to train SLA staff to perform network assessments as a way to maintain network upgrades in libraries, beyond the life of the BTOP grant.

Further, many small and rural libraries without dedicated IT staff rely on their vendors for advice and guidance. Additional technical support coordinated by the state library agency would help them better assess their own needs, evaluate their service and equipment options, and strengthen their ability to negotiate solutions.

We believe ALA's proposed demonstration project can bring multiple benefits to our state(s), including:

- increased local library participation in the E-rate program and/or improved purchasing decisions through the E-rate program;
- increased knowledge at both the local and state level of barriers to high-capacity broadband to and within library buildings;
- improved capacity within state library agencies to look across libraries of different sizes and circumstances to identify common concerns that may yield scalable opportunities for infrastructure development to overcome identified barriers;
- increased opportunities to identify and inform public/private sector partnerships at both local, statewide, and regional levels; and
- improved opportunities to better inform future action by the Commission or other entities supporting local library technology.

This two-year demonstration will directly support library E-rate applicants in the near-term, as well as increase opportunities for developing state, regional and national solutions over the longer term.

Where applicable, COSLA supports ALA's proposals to upgrade library broadband capacity via school-library wide area network partnerships and deployment of scalable technologies at affordable construction and recurring costs.

We also agree with ALA's proposed phasing down of support for voice services. COSLA endorses the proposed focus on broadband services. However, many states have a number of public libraries that rely on E-rate support for voice services, so a planned phase-out with exemptions where alternatives to voice are not available, reliable, or reasonably priced will ease the transition for them.

Finally, COSLA supports ALA's additional recommendations to improve library participation in the E-rate program as described in its April 7, 2014 comments:

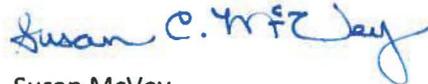
- Using the Institute of Museum and Library Services' (IMLS) version of the geo-coding created by NCES for determining library rurality.
- Revising the method for determining library discounts that more accurately reflects the demographics of a library's patrons.
- Enforcing the Lowest Corresponding Price rule.
- Removing the E-rate technology plan requirement for Priority 2 services and move development of technology plans to the state and/or local level.
- Simplifying the E-rate application process by replacing E-rate program procurement rules with those of the applicable state or locality; allowing applicants to receive their E-rate funds directly from USAC; and eliminating the Form 470 and allowing applicants to file an evergreen Form 471 for multi-year contracts.

Our nation's libraries represent an investment in lifelong learning and Internet access for all—especially for the roughly 30 percent of Americans who lack home broadband access. The E-rate program is the engine powering much of our work to ensure no one is excluded from digital opportunity. COSLA looks forward to continuing to help fulfill our nation's Universal Service goals through a future-focused and robust E-rate 2.0. Thank you for the opportunity to comment and for your consideration of our recommendations.

Sincerely,



Ann Joslin
Idaho State Librarian
President, COSLA



Susan McVey
Oklahoma State Librarian
Chair, COSLA Legislation Committee