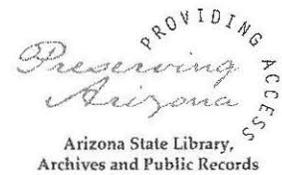




ARIZONA STATE
LIBRARY, ARCHIVES AND PUBLIC RECORDS
A DIVISION OF THE ARIZONA SECRETARY OF STATE



Joan Clark, State Librarian & Director

May 1, 2014

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

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

Dear Secretary Dortch:

The E-rate Program provides critical support for digital learning and public access to online information through America's 16,415 public libraries. For this reason, the Arizona State Library, Archives and Public Records welcomes the Federal Communications Commission's (FCC) 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. We also support the 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.

State library agencies provide a critical link between federal policies and local, independent library systems, many of which have limited information technology (IT) staff in place to support network planning and broadband procurement. In Arizona, for instance, our E-rate Coordinator works with the State Procurement Office to ensure that a State Master Contract is in place for E-rate eligible services so that all Libraries get the best possible rates for their bandwidth needs. Applicants are trained and updated about the latest development and guidelines. Timely reminders and assistance during PIA reviews has helped Arizona libraries maximize their E-rate reimbursements. Currently 96% of our Public Libraries are successfully applying for E-rate dollars.

We believe this demonstration project can bring multiple benefits to our state, including:

- increase knowledge at both the local and state level of barriers to high-capacity broadband to and within library buildings;
- allow the state library agency to look across libraries of different sizes and circumstances to identify common concerns, bulk purchasing opportunities and other interventions;
- increase local library participation in the E-rate program and/or improve purchasing decisions through the E-rate program;
- provide evaluation of interventions 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.

Libraries that have had dedicated IT staff, with E-rate training and responsibilities, have often fared better in securing affordable and required bandwidth for their libraries while one of the challenges for the smaller libraries is that they share IT staff with their local government and often libraries needs are not the top priority.

In order to address the lack of affordable access to scalable, high-capacity broadband Arizona Strategic Enterprise Technology, Arizona State Procurement Office and the Arizona State Library are working on an RFP for service providers to address the gaps in high capacity, affordable, broadband in rural Arizona. Arizona Broadband Mapping BTOP project, paints the current picture and show where these gaps are.

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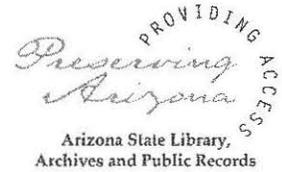
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Senate Bill (SB) 1402, known as the Arizona Digital Highways bill, was signed into law by Governor Janice K. Brewer. The bill establishes a sustainable broadband deployment program that will better enable economic growth, education, public safety, healthcare, and business across Arizona. Private sector providers will now be able to more economically extend broadband services to poorly served rural Arizonians by expanding the use of existing state roadway rights-of-way (ROW). This will be accomplished under the guidance of the Arizona Department of Transportation (ADOT) in partnership with the Arizona Strategic Enterprise Technology (ASET) office in the Department of Administration. Multiple empty fiber-optic conduits will be buried along specified state highways. These multiple separate conduits will be leased to broadband providers to install fiber before conduits are constructed. The outcome will be streamlined access to rural communities, at a significantly lower cost to providers for constructing long distance digital capacity. These lowered costs are expected to encourage new investments by provider's thereby accelerating and improving availability of high-capacity digital services in poorly served areas of Arizona. It will ensure that the schools, libraries and healthcare institutions will have available high capacity bandwidth, and at an affordable rate. It is expected to take a number of years to fully implement this program throughout the rural areas of the state.

We welcome the opportunity to work with our local libraries to identify potential school partners and broadband providers that, with limited special construction, may greatly increase capacity and reduce costs.

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. Arizona State Library, Archives and Public Records along with libraries across our state look forward to helping 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,

Joan Clark
Arizona State Librarian

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