



URBAN
LIBRARIES
COUNCIL

INSPIRING LIBRARIES.
TRANSFORMING COMMUNITIES.

May 5, 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 behalf of the Urban Libraries Council (“ULC”), I am writing to submit additional consideration regarding the above-captioned proceeding.

I currently serve as the Director of Administration and Chief Technology Officer at the Boston Public Library (“BPL”) and act as the head of the Metro Boston Library Network (“MBLN”), one of the statewide automated networks in Massachusetts, which qualifies as a consortium for E-rate funding application purposes. I have overseen the BPL and MBLN’s participation in the E-rate program for the last five years. I manage our relationship with the other statewide networks and the statewide E-rate coordinator at the Massachusetts Board of Library Commissioners.

As ULC has noted in its other filings, public libraries serve a distinctive and critical need in every American community. For millions of Americans, public libraries are now commonly the sole source of free Internet access in their communities. The BPL, in coordination with the MBLN, serves residents with free Internet access at 28 public library locations in its region. In doing so, the BPL is helping residents continue their educational pursuits, access online governmental services and search for employment. For example, we offer free computer access sessions on the library’s approximately 1200 systems, access to Wi-Fi sessions at all locations for patrons with their own devices, basic technology skills training, and support in resume creation and job applications.

To ensure that public libraries can continue to meet the needs of the more than 100 million adults and children who use them for Internet access every year, connectivity to and inside America’s 17,000 public library buildings needs to be significantly upgraded. This upgrade should ensure that every public library has at least a 1 GBPS connection to the building and the ability to offer sufficient internal connectivity to all users at peak hours (which ULC believes to be at least 5 MBPS download and 1 MBPS upload speeds). Funding connectivity at these levels is necessary because these speeds allow reasonable file download times, as well as access to video and other streaming services without significant disruption or delay. Whether for simple technology literacy, media creation skills, or access to online training services, this is the new minimum standard in basic access to technology. A network is only ever as good as its weakest link. Thus, comprehensive funding must cover Internet access, routing and switching equipment, site-to-site connectivity, and endpoint bandwidth delivery—both wired and wireless.

In its recent comments, ULC also provided diagnostic data on connectivity within a number of library systems. This data confirmed that 1 GBPS connections to library buildings are extremely rare. As discussed more fully below, public libraries lack sufficient to-the-building and internal Wi-Fi connectivity because they have obtained an insignificant amount of E-Rate funds for many years. At BPL, due to the unpredictable nature of E-rate funding and the continuing decrease in available funding, specifically for priority two maintenance and initiatives (or internal connections), we have been unable to maintain an optimal maintenance program for our network infrastructure and unable to continue increasing bandwidth speeds to keep pace with demand (a demand that can only be met with concomitant upgrades in supporting equipment). We have also lacked the funds necessary to provide a regular schedule of equipment upgrades for endpoint capacity, such as wireless access points or the infrastructure required to further support greater Internet access capacity.

Upgrading internal connectivity is furthermore critically important given that the dominant modern use case for library Internet access is internal Wi-Fi connectivity to a high-speed broadband connection. Like many other library systems, the BPL has seen its internal Wi-Fi usage skyrocket in recent years. As we have moved towards greater library-lent or user-brought mobile devices (*e.g.*, laptops, tablets, smartphones and other devices), the number of users, the types of devices and the services consumed all have contributed to a 10-20 fold increase in demand.

Public libraries operate in approximately 17,000 buildings throughout the country. This compares to nearly 100,000 public school buildings. Even though there are fewer library buildings, libraries in Boston, neighboring communities and many other cities have more users per day than most schools. Libraries could have received program funding in generally the same proportion as the number of library buildings to school buildings. Instead, recent data from the Institute of Museum and Library Services indicates that libraries only have received between 3-5 percent of allocated funds. While schools currently receive approximately \$2.3 billion out of the \$2.4 billion in available funds, ULC agrees that schools should be receiving much higher amounts immediately because of inflation indexing. That being said, public libraries should receive *their* fair proportion to ensure that funding is available to achieve a minimum of 1 GBPS external connectivity and 5 MBPS internal connectivity.

In this proceeding, the FCC also inevitably must decide how to prioritize its funding. In ULC's view, the Commission should allocate and prioritize funds by focusing on the greatest economic need. Defining the correct parameters of need, therefore, is critical. ULC submits that prioritizing funds according to number of users, served population, and income will ensure that the neediest libraries receive funding priority. In no way should such prioritizations pit urban against rural or library against school; this is rather an opportunity to further ensure that the playing field is leveled for all simultaneously.

By recognizing the critical role of the public library, setting solid, achievable targets for upgrading connectivity and all its supporting components, and serving the neediest communities first wherever they may be found, the FCC can fulfill its statutory mission of providing advanced communications services to every American.

Respectfully submitted for the Urban Libraries Council,

David Leonard
Boston Public Library – Director of Administration & Chief Technology Officer