May 15, 2014

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

RE: WC Docket No. 13-184

Dear Secretary Dortch:

COSLA is an independent organization of the chief officers of state and territorial agencies designated as the State Library Administrative Agency (SLAA). Each has responsibility for statewide development of public libraries in their respective state, whether the libraries be large, small, remote, rural, suburban, or urban. 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.

On May 7, 2014, Commissioner Jessica Rosenworcel and her Legal Advisor Priscilla Delgado Argeris attended a portion of the annual Spring Meeting of COSLA in Washington D.C. The meeting participants included COSLA members, member designates, association staff, and invited guests. A complete list of meeting participants is attached.

COSLA invited Commissioner Rosenworcel to attend the meeting to share her views on E-rate modernization and to learn from the experiences and priorities of state library agencies given the current E-rate proceeding. Commissioner Rosenworcel presented public remarks about the future of libraries and technology. After a few questions, COSLA introduced its top priorities for the modernization of the E-rate program. These priorities are captured below along with a further explanation of COSLA’s position on each one:
1. Simplification

COSLA is in agreement on the need for simplification of the process for filing for E-rate funding. To simplify and expedite the E-rate process for libraries and schools we see value in having just one application process (e.g., one form 470 and 471) for multi-year contracts, allowing applicants to follow state purchasing rules, and providing payment directly to the applicant without payments going through the vendor. In addition, eliminating the technology plan requirement for Priority Two funding for libraries would increase library applications for this critical funding.

2. Scalable and affordable

The E-rate funding should be designed in a manner that offers scalability for growth into higher broadband capacity. Libraries are experiencing the need to increase their bandwidth in shorter intervals today. As libraries and schools hit the maximum capacity of their broadband connectivity, there needs to be a process that enables them to simply and affordably upgrade their connections in real-time to support the growing demands of their community.

3. Transparency in procurement: cost and actual bandwidth delivered

The cost and speed of broadband connectivity provided by vendors under E-rate service contracts should be collected and made transparent in a timely manner to all stakeholders. This would ensure information is available to make informed decisions that improve performance. To help ensure that our libraries and schools are getting the lowest cost for their broadband, the FCC must take more aggressive action to enforce its Lowest Corresponding Price rule.

4. Broadband build out: outside and inside the library

We have rural, suburban, and some urban libraries that still require funding to build out the middle and last mile broadband network to obtain high speed broadband connectivity. And according to an ALA survey approximately 60% of our libraries still do not have fiber, which is essential to meet both their broadband needs and the National Broadband Plan’s goal of 1Gbps to anchor institutions. A one-time build out fund would allow these libraries to migrate to fiber connectivity with likely lower annualized services costs and higher levels of service to their customers.

In addition, many libraries cannot afford the internal equipment upgrades to provide robust Wi-Fi access and make optimal use of the broadband that comes into the library. For example, five (5) libraries in one state were purchasing 45 to 100 mbps but only delivering 4 to 17 mbps due to inadequate in-building wiring, routers, computers, and wireless access points. After a network assessment and remediation by the SLAA, the in-building delivery was increased three to ten times to realize the full capacity of their...
purchased broadband speeds. Like the need for external bandwidth, a one-time build out fund would allow these libraries to upgrade their internal networks. Without this financial support, many of our libraries cannot move forward with advanced technology given their limited annual budgets. Therefore, we encourage the continuation of E-rate funding to support broadband connectivity both outside and inside the library.

5. Explore new methods for determining library discount rates

We are interested in working with the FCC to explore and financially model potential new methods for determining library discount rates that incorporate measures more suitable for public library outlets. The current method of tying library discount rates to the number of students in local school districts qualified for free and reduced lunch programs presents challenges for libraries. Public libraries serve a wider population base that often brings one or more devices into the library (or library parking lot) to access services and resources via the Wi-Fi network. Also, some large library systems have multiple school districts in their service area and they have the added complexity of aggregating the E-rate application data. If other discount rate methods are studied, we need to extensively model them to understand the financial impact and ensure that they will not add complexity to the E-rate application process.

6. State Library Administrative Agencies: technical assistance, network assessments and procurement

SLAAs are committed to the success of high speed broadband supported by the E-rate program to ensure a connected America. For over 10 years, SLAAs have been providing technical assistance and direct support to public libraries in terms of computing hardware, digital applications, connectivity and network equipment, and digital literacy training. Public libraries have been able to leverage the knowledge, skills and resources of SLAAs as needed - given their own level of expertise - to make the most of scarce E-rate funds. This support is critical especially for small and rural libraries that do not have the expertise or capacity to manage an RFP process, conduct vendor outreach, or negotiate contracts that best meet their local needs.

SLAAs have proven their ability to provide statewide technical assistance, network assessments, and procurement programs for broadband connectivity and equipment upgrades. SLAAs have developed and managed major statewide programs that have successfully advanced technology, increased service levels, and lowered connectivity costs for public libraries. For example, twenty-three (23) SLAAs were direct recipients or sub-recipients of the Broadband Technology Opportunities Program (BTOP) grants. Prior to the introduction of BTOP, seven (7) states implemented Opportunity Online Broadband Projects with the Bill & Melinda Gates Foundation.

As stated in our letter dated April 21, 2014 on this same matter, COSLA supports the American Library Association’s proposal to advance cost-efficient library network
development via technical support enabled or coordinated in some manner by state library administrative agencies. We’ve seen a variety of successful statewide support models through these recent projects, typically funded by grant and federal programs. To raise broadband connectivity, SLAAs have connected public libraries to state research and education networks, managed statewide bid and purchase agreements, as well as facilitated unified bidding and evaluation support with separate contracts. For network assessments and Wi-Fi upgrades, SLAAs have directly contracted or worked with state partners to conduct public library assessments, fund circuit rider activities, or provide software tools for connectivity assessments.

COSLA will be capturing these and other examples in technology planning blueprints for (a) broadband network connectivity planning and acquisition and (b) public library network and Wi-Fi assessments to guide and streamline the replication of these practices by SLAAs if funding becomes available to do so. We believe that using E-rate funds for these types of technical support by SLAAs will accelerate upgrades to high capacity broadband while improving the overall cost-effectiveness of public library spending. We need to scale up the application of our accumulated expertise to provide technical support to all public libraries to achieve these significant gains.

If you have any questions or need additional information, please do not hesitate to contact me at Ann.Joslin@libraries.idaho.gov.

Respectfully submitted,

[Signature]

Ann Joslin
President
Chief Officers of State Library Agencies