

ALA American Library Association

May 22, 2014

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

RE: WC Docket No. 13-184

Dear Secretary Dortch:

On May 19, 2014, Emily Sheketoff, Executive Director, ALA Washington Office, Marijke Visser, Assistant Director, ALA Office for Information Technology Policy (OITP), Larra Clark, Director, Program on Networks, OITP, and Alan Fishel, Senior Counsel, OITP met with Commissioner Ajit Pai and Nicholas Degani, Wireline Legal Advisor to the Commissioner. The following topics were discussed:

ALA proposed focusing a significant portion of the \$2 billion “down payment” on those libraries and schools that are furthest behind and have the most challenges in securing affordable high-capacity broadband. As of 2012, for instance, fully *half* of Kansas public libraries reported speeds of 1.5 Mbps or less and an average of eight public Internet access computers. ALA provided a map of internet connection speeds for Kansas public libraries also filed in this docket.

Designating a portion of the down payment toward building out scalable and affordable technologies where high-capacity broadband is not available, ensuring it is affordable, and enabling libraries and schools to develop cost-efficient and effective networks through state-centric planning and guidance, will result in a “two-for-one” investment of these critical resources. Investments made in rural areas will increase library participation in the E-rate program; dramatically move libraries toward the capacity goal of 1 gigabit per second speeds for libraries by 2018—if not earlier; and provide evidence for cost-effective practices that will ultimately lead to more efficient use of E-rate funds.

ALA discussed the nature of internal wiring and wireless access in libraries and proposed that the Commission also designate a portion of the \$2 billion down payment toward ensuring library LAN and Wi-Fi networks are sufficient for both public access computers and the increasing proliferation of patron-owned devices. Increased library broadband capacity to and within our buildings supports the *E's of libraries*TM in communities nationwide: completing educational offerings beyond the traditional school day for learners of all ages, jumpstarting employment and entrepreneurial opportunities, engaging community partners and empowering millions of people who rely on public libraries for their only or best access to the internet and internet-enabled resources and services.

ALA also advocated that the Commission use locale code designations from the Institute of Museum and Library Services (IMLS) to more accurately identify rural libraries. ALA recommends using IMLS locale code designations for “rural” areas along with “town, remote” and “town, distant” to define “rural” for purposes of the E-rate program to ensure greater funding to libraries in truly rural areas and communities distant from urban cores. IMLS uses the same methodology and definitions for locale codes that the National Center for Education Statistics created for schools.

If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Marijke Visser', followed by a horizontal flourish.

Marijke Visser
Assistant Director, Office for Information Technology Policy
American Library Association
Washington Office