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July 7, 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 July 3, 2014, Reed Hundt, outside counsel to the Urban Libraries Council (“ULC”) had a telephone conversation with Jon Wilkins, Managing Director of the Federal Communications Commission (“FCC” or “Commission”), to discuss the above-referenced proceeding.

During the call, Mr. Hundt asserted that any use of building square footage as a metric to set an E-rate funding cap for public libraries would be grossly unfair to the millions of patrons of the nation’s urban libraries, many of whom are disproportionately low-income, unemployed or underemployed. Instead, the Commission should employ the same people-based measurement for libraries that the Commission is contemplating for schools. It would be administratively easy for libraries to track and report the number of individuals who access their buildings on a daily basis.

If the Commission were to retain building square footage as the metric for libraries, Mr. Hundt stated that the Commission must compile a complete record of the actual costs of public libraries, especially large urban libraries, in deploying WiFi services prior to establishing a set funding amount. Mr. Hundt maintained that recent data collected by public libraries confirms that a \$1/square foot funding

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amount would not meet the needs of the nation's public libraries, especially cramped and crowded urban libraries. This funding amount would limit public libraries to \$40 million in annual funding for internal connections, which is entirely insufficient to provide robust WiFi services to the 4.2 million daily library visitors.

Finally, Mr. Hundt highlighted the recent data that public libraries have collected on their actual costs in deploying and providing WiFi services. This data, including the attached letter from the Director of Information Technology at the Seattle Public Library, confirms that the appropriate funding amount should be set at \$4/square foot. This funding amount would reflect the actual costs that libraries incur in deploying and providing WiFi networks that meet the needs of their communities.

Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/

John M. Beahn

Counsel to Urban Libraries Council

Attachment