



The Seattle Public Library

Tom Wheeler
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

1 July 2014

Dear Mr. Chairman and Commissioners:

I have been asked two questions:

- 1) How much did it cost The Seattle Public Library – with a central library and 26 branches – to provide wireline and wireless Internet access to our patrons?
- 2) What is our view about using square footage of buildings to limit the amount of money a public library to obtain from the FCC through the E-Rate program?

The answer to the first question is approximately \$2 million to \$3 million over five years. We have spent or plan to spend about \$2 million from 2011 through 2014 on routers, switches, power management, wireless controllers, wireless access points, firewalls, internal cabling, installation, software, and licenses. These costs reflect discounts ranging from 50% to 70% on equipment and using our own personnel for much of the installations. We also expect that maintenance and service fees will add at least another \$1 million in additional expenses over the next five years. Our costs are, in fact, comparatively low because we are able to draw on a very skilled workforce and reside in a technology-rich region with high levels of competition and opportunities for negotiation.

The answer to the second question is that using square footage is unfair to urban libraries, and to our patrons who are disproportionately low-income, unemployed, or underemployed. Our libraries total approximately 633,000 square feet; thus, the cost over five years of delivering access to digital information is between \$4 and \$5 per square foot. In general, urban libraries are more crowded and serve many more patrons in smaller spaces than our suburban or rural counterparts. Moreover, using square footage ignores most factors relevant to Wi-Fi performance.

We are investing at this level because Wi-Fi is essential for our urban patrons. Increasingly, many users bring their own devices to our buildings for downloading our material, engaging in employment-related activities, researching medical concerns, participating in educational and training sessions, and doing their course work. In addition, many public libraries, including our own, are ourselves using and providing more and more wireless devices for use by our patrons to meet the demands of an increasingly mobile technology landscape.

If the FCC allocates money to libraries on a per square footage basis it will send much more money to capacious, uncrowded suburban libraries and less money available for smaller,

crowded urban libraries whose patrons often have no other practical way to obtain access to the Internet for seeking employment, education, or participation in society.

Wi-Fi costs are not merely a function of the square footage of a room with wireless connectivity. Wi-Fi performance is a function of users, interference from adjacent networks in other buildings, and architectural impediments. A room of a certain size with many users will have poorer Wi-Fi service than the same room with the same network that has fewer users. Resolving these capacity and technology problems requires a larger expenditure for expanding a Wi-Fi infrastructure.

If you asked me how the FCC should fund digital access for libraries, I would say there are two viable alternative methods and libraries should be allowed to choose the method that benefits them more:

1. Fund public libraries at the rate of no less than \$4 per square foot;
2. Fund public libraries at the rate of \$150 per average daily visitor.

Give libraries the money we need to deliver what is typically the only free public Internet access available in the social landscape. Of course, develop program rules to help or require libraries to have efficient procurement processes and clear program guidelines that will enable all libraries to participate in available E-rate program opportunities.

We are happy to share our practices and outcomes with anyone.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jim Loter". The signature is stylized and cursive.

Jim Loter
Director, Information Technology
The Seattle Public Library