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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 brief telephone conversation with Ruth Milkman, Chief of Staff to Chairman Tom Wheeler, 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 in setting an internal connections funding cap for libraries, Mr. Hundt stated that the Commission must first compile a complete record of the actual costs of public libraries, especially large urban libraries, in deploying WiFi services. Mr. Hundt maintained that the Commission should not move forward with its contemplated reforms of the E-rate program without this data. To assist the Commission in

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compiling this record, ULC has requested that its members provide data on their actual costs in deploying and providing WiFi services in their communities.

The data collected in response to this request confirms that a \$1/square foot funding amount would be entirely insufficient to meet the needs of the nation's public libraries, especially cramped and crowded urban libraries. According to ULC members, a funding amount of \$4/square foot would reflect the actual costs that they incur in deploying and providing WiFi networks that meet the needs of their communities. Mr. Hundt noted that ULC members will be publicly filing this data with the Commission.

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

Respectfully submitted,

/s/

John M. Beahn

*Counsel to Urban Libraries Council*