Dayton Metro
LIBRARY

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Timothy G. Kambitsch, Executive Director

July 7, 2014

Mr. Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Dear Chairman Wheeler,

I am writing to share the impact of proposed E-Rate funding changes under consideration by the Federal Communications Commission. The Dayton Metro Library supports a revised formula for allocation of E-Rate Funds to public libraries based on the number of visitors.

Wired and Wi-Fi access by residents has become an essential part of modern life. As I am certain you agree, success in a digital world is impossible without ready access to broadband Internet services. The Dayton Metro Library is the number one provider of free access to the Internet in the Dayton area with over 700,000 unique visits by resident per year. With nearly one third of its 450,000 patrons without broadband access from home, it is their public library that opens doors for personal, family, and community success.

Library patrons expect more than "Starbuck quality" Internet access. Our users do much more than merely use library Internet access for checking email and updating social networking sites. Demand for bandwidth continues to grow at an increasingly faster pace. This demand requires frequent and expensive upgrades to our capacity; not just in terms of data rates from carriers but also replacement of capital components from the desktop to routers and data switches.

A proposal to limit funding of internal connections to one dollar per square foot over a five year time frame creates an artificial limit and does not correspond to the digital access needs of our library's community. The Dayton Metro Library spends approximately $500,000 on an annual basis for internal connections and the proposal to limit it to one dollar per square foot within a five year is just plain inadequate. If a per square foot formula is used, it needs to be four times that amount or merely make that an annual limit.

However, even at a higher limit, this measure is flawed as it is essentially making decisions about digital access based substantially upon the number of books on library shelves. Determining digital access allocations on the size of building creates an inequity for urban libraries where small and crowded branches predominate. This formula will leave the residents that need public access to computers the most disadvantaged and potentially further away from the equitable access desired by all including the leadership in Congress and at the FCC.

Number of annual visitors is a much more logical measure by which to allocate funds and, if necessary, to establish limits. Our main library and its 20 branch libraries see scores of patrons, those most in need of digital access, waiting at their front doors every day. Residents of all ages seeking Internet access make up a significant percentage of those visiting our libraries. E-Rate funding based upon visitor counts will allow those with the greatest demand to see the most financial support. I endorse funding formula based on $150 per annual average visit as recommended by the Urban Libraries Council.

If I can do more to help illustrate the impact of proposed changes to E-Rate funding on public library patrons, please do not hesitate to ask.

Sincerely,

Tim Kambitsch
Executive Director