

July 2, 2014

Chairman Tom Wheeler
Federal Communication Commission

Dear Chairman Wheeler,

This letter addresses the two questions posed to us by the Urban Libraries Council regarding the cost of providing internet access in public libraries:

- 1) How much does it cost The Pioneer Library System headquartered in Norman, Oklahoma – serving 11 branches, some urban and some rural, in three counties– 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 obtains from the FCC through the E-Rate program?

Regarding these questions:

- 1) Given our current infrastructure for internet access we spend approximately \$380,000 to \$400,000 each year for all 11 branches some of which is reimbursed by erate. In 5 years we would expect to require in excess of \$2,000,000 to fund these services for all 11 branches. This amount includes all the devices, licenses, and software necessary to provide these services today and to do simple replacements in the future. We also use our own personnel for much of the installation of networking and wiring management, server administration, and software provision. Within the past 5 years we have seen drastically increased demands in the speed requirements for providing these services. In other words, the 10 MB service that used to be adequate for 20 to 30 computers is now not tolerable when trying to perform normal functions. We have increased speeds wherever we can, but we expect that within 5 years in order provide good services for people in our area who either have no access at all or only minimal access at home, we will need to increase speeds from our current 100 MB to gigabit or more. This will also require upgrades to all equipment that will go well beyond the above estimates for normal replacement.
- 2) Square footage is a poor indicator for fund allocation, because it does not account for vastly different arrangements in architecture and seating potential. One building that has an open structure with few seats might require minimal

needs for wireless access, for example. The recommended 2500 square feet for an access point might work there. However a building with low ceilings and many architectural barriers will require far more access points. Likewise an open architecture with dense seating will require many more access points since the amount of usage by the number of patrons drastically affects bandwidth. It would seemingly require a matrix to account for both square footage and foot traffic within the building, but of course there are other elements that also impact access. Surrounding interference from other institutions, particularly in more urban areas, requires more robust equipment within the institution. In our area of the country we also have concerns about the stability of electrical services during storms, so we have to plan for more surge equipment and more frequent replacement of hardware.

Of course, in trying to fund such services, no one would intentionally select any complicated method that reflects the complexity of the issues, so it is wise to determine a simple parameter that will also make allowances for all the things not covered specifically by that particular alternative. To have a choice between two such parameters would allow libraries some flexibility for selecting a scenario that better suits their particular community, architecture, and service levels. Two such viable alternatives would be:

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

With adequate support public libraries can deliver, sustain, and advance the internet access increasingly required for all citizens to participate in our American society. The equitable access libraries provide is and will be fundamental for our democracy and our entrepreneurial economy.

Sincerely,



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