



---

July 2, 2014

Tom Wheeler  
Chairman, Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Mr. Chairman and Commissioners:

The Rochester Public Library (RPL) has participated in discussions and feedback on proposed changes to E-rate eligibility and programming at the New York State level, as well as through our participation in the Urban Libraries Council.

We wish to comment directly on the FCC's inquiry and pending recommendation for levels of funding for public library digital access and infrastructure.

Several colleagues have submitted cogent and thoughtful testimony as well as written arguments for the need for accurate cost assumptions for wireless access. We agree with statements provided July 1, 2014 from the Seattle Public Library asking for consideration of true wireless costs, and the folly of square footage funding assumptions. Several additional considerations the RPL wishes to highlight on cost:

- Many urban libraries, who have demonstrated need for equitable and robust public internet access, are located in buildings older than 50 years. The cost of retrofitting existing buildings for modern technology infrastructure is not without considerable expense beyond wireless capacity - such as asbestos testing and remediation.
- The municipalities in which urban libraries engage services often incorporate legislation to support sustainable wage rates for professional services and public works projects. While a commendable effort, this further distances the gap in private costs for technology infrastructure versus public costs.

We echo the comments from Seattle Public on selecting an alternative to fund wireless infrastructure, specifically the rate per daily visitor. Our central and branch libraries vary significantly by square footage, from 300,000 to 4,000 square feet, and wireless capacity is planned primarily as a function of patron usage patterns, not facility size. We request the FCC fund public libraries at the rate of \$150 per average daily visitor.

Sincerely,

Patricia Uttaro  
Director, Rochester Public Library