

**Before the  
Federal Communications Commission  
Washington D.C. 20554**

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In the Matter of Comments on the Draft	)	
Eligible Services List	)	CC Docket No. 02-6
	)	GN Docket 09-51
Modernizing the E-rate	)	WC Docket No. 13-184
Program for Schools and Libraries	)	
	)	
_____	)	

**COMMENTS OF THE URBAN LIBRARIES COUNCIL**

The Urban Libraries Council (“ULC”) hereby responds to the Public Notice issued on August 4, 2014 in the above-captioned proceedings seeking comment on the draft eligible services list (“ESL”) for the E-rate program.<sup>1</sup>

While ULC intends to submit detailed reply comments in this proceeding that will respond to the specific issues raised in the Public Notice, it urges the Commission to undertake a thorough review and update of the ESL in light of the ongoing fundamental restructuring of the E-rate program. This thorough review must ensure that the ESL includes those systems and components necessary for public libraries to offer robust broadband connectivity in their communities. As ULC has noted in its other filings, public libraries serve a distinctive and critical need in every American community. For millions of Americans, public libraries have become the sole source of free Internet access in their communities. The ESL

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<sup>1</sup> See *Wireline Competition Bureau Seeks Comment on Draft Eligible Services List for Schools and Libraries Universal Service Programs*, Public Notice, DA 14-1130 (rel. Aug. 4, 2014).

must account for this role and include all of the elements necessary for libraries to meet the ever-growing demands for broadband services.

In particular, the ESL should include those internal connections and components that urban libraries need to offer broadband connectivity within their facilities. ULC has provided the Commission with a variety of diagnostic data on the status of connectivity within a number of library systems.<sup>2</sup> This data confirmed that adequate in-building Wi-Fi connectivity is almost nonexistent. As the ULC data demonstrated, even large libraries do not provide Wi-Fi connections adequate for basic Internet-related tasks (e.g., completing job applications, filling out online unemployment forms, etc.). The Commission must update the ESL to ensure that libraries can upgrade their internal networks and systems to provide the WiFi connections needed by communities.

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<sup>2</sup> See Initial Comments of the Urban Libraries Council, WC Docket No. 13-184, at p.8 (Mar. 6, 2014).

ULC looks forward to working with the Commission in this proceeding to ensure that the ESL includes the components and systems necessary for libraries to continue their essential roles in providing broadband connectivity to their communities.

Respectfully submitted,

/s/

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