



June 9, 2014

Dear Chairman Wheeler and Commissioners,

The members of the Urban Libraries Council (ULC) appreciate the deliberative process underway at the Commission to modernize the nation's E-rate program. We recognize the many voices and opinions which must be considered and are pleased to participate in representing the views of our over 130 public library members across the country. To that end, we want to make two critical observations that have relevance to the restructuring of E-rate.

**1) Public Libraries = Education**

When the E-rate was created in 1997 for libraries and schools, its focus was on providing access to the universe of knowledge and information that was just beginning to be made available by broadband technologies.

The Great Recession provided a harsh reminder that education must be a lifelong pursuit in the 21<sup>st</sup> century Knowledge Economy. We now recognize that we must be 'students for life,' continuously leveling-up our knowledge and skills to meet the ever-changing needs of today's workplace.

Throughout the recession, the public library became the *one* place that millions of Americans could learn how – without having to pay out-of-pocket – to use a computer, to complete on-line job applications, to conduct job searches and to acquire computer skills that could lead to employment.

As this country's most trusted and accessed civic organization, public libraries meet users at whatever age and life stage (from toddler to student to worker) they enter the library and advance the individual's learning and development. To be sure, libraries are not responsible for presenting the K-12 school curriculum. Yet, public libraries have always been – and are ever more critical as – a key institution within our education infrastructure.

By preparing toddlers to enter school, supporting traditional K-12 school curriculums through organized homework help centers, advancing programs that address summer learning loss, and providing resources and programs to catalyze adult skills development (particularly adults who have been unsuccessful in the traditional school setting), public libraries are key to our country's education infrastructure and must be seen as equal in importance to schools for receiving their share of E-rate.

**2) Connectivity for All Public Libraries – No Matter the Location**

The Urban Libraries Council believes that all public libraries – no matter their location – require immediate and comprehensive support in acquiring broadband connectivity. The Commission should not be led into a false argument of urban libraries over suburban or rural. In reality, ULC member library systems, like many others across the United States,

have library branches in all three settings. (Please see attached Document A.) Funds provided to these systems are used in all three settings.

ULC stands firmly with Chairman Wheeler and endorses his statement on January 16, 2014 that all public libraries should receive one gigabyte by 2016. All means all – no matter the location.

We recognize, however, that we do not live in a country of limitless funds and that upgrading connectivity in the nation's libraries must be done in a manner that correlates to *need* not location. That is why ULC is suggesting a two-part needs formula calculating: 1) income of the user group (weighted by cost of living), and 2) number of daily users of the building (the user number provides the basis for assessing the required Wi-Fi and desktop connectivity).

Thank you for the consideration you are giving the E-rate modernization. ULC understands the complexity of the effort. Similar to this submission, past ULC filings have provided data gathered from member libraries. We are willing to provide any additional data that can be of use to the Commission as it continues its work in the weeks and months ahead.

Thank you for all of your work to ensure that public libraries have the best resources possible to ensure the brightest possible future for our country.

Sincerely,

A handwritten signature in black ink, appearing to read "SBenton". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Susan Benton  
President and CEO