

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of:

International Comparison and Consumer)	GN Docket No. 09-47
Survey Requirements in the Broadband Data)	
Improvement Act)	
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Inquiry Concerning the Deployment of)	GN Docket No. 09-137
Advanced Telecommunications Capability to)	
All Americans in a Reasonable and Timely)	
Fashion, and Possible Steps to Accelerate)	
Such Deployment Pursuant to Section 706)	
of the Telecommunications Act of 1996, as)	
Amended by the Broadband Data)	
Improvement Act)	

**COMMENTS OF THE AMERICAN LIBRARY ASSOCIATION
IN RESPONSE TO NBP PUBLIC NOTICE # 18**

The American Library Association (ALA), the world’s oldest and largest professional library association, is pleased to provide comments on this Public Notice seeking comments on the relationship between broadband and economic opportunity especially as it relates to advancing community development, worker training, entrepreneurial activity, job creation, and economic growth.

There are currently 16,543 public library outlets in communities across the nation. Libraries are found in virtually every community in the United States.¹ These libraries play a vital role in their communities in supporting workforce development, small business creation, education from the cradle through higher and continuing education, and access to government resources through public access computer terminals. Communities throughout the nation are reporting an increase in patron visits to the library as the economy continues to suffer, unemployment continues to

¹ Henderson, E., et al. (2009). *Public Libraries Survey: Fiscal Year 2007* (IMLS-2009–PLS-02). Institute of Museum and Library Services. Washington, DC. Available: http://harvester.census.gov/imls/pubs/Publications/fy2007_pls_report.pdf.

rise, and workers increasingly need to retool or refine skills. One library patron in Cincinnati stated, "... It just means so much to me to be able to use a computer here. You can't find or apply for jobs without one."² The public is increasingly turning to the library to use its free resources. This important access to information and services that libraries provide promotes the economic development in those communities. Public libraries are available to all people; this is directly in line with the National Broadband Plan's (NBP's) goals of maximizing the utilization of broadband infrastructure and service and thereby aiding local economies by providing no-fee broadband enabled applications and services.

These comments seek to demonstrate the unique position of public libraries as broadband anchor institutions with a mission to serve the information needs of the community. By providing access to online resources and services, libraries directly strengthen the economic stability and quality of life in communities across the country. Recent studies identify the positive impact libraries have on local, state, and the national economies. For example, at the local level, Carnegie Mellon University's Center for Economic Development for the Carnegie Library of Pittsburgh found the library was "the most visited regional asset, attracting 500 thousand more visitors than the Carnegie Science Center and the Pittsburgh Steelers combined."³

Furthermore, libraries have a keen understanding of the information needs particular to their community and develop innovative services that meet those needs. Libraries across the country incorporate purposeful uses of the Internet to develop critical services—basic computer and Internet skills training, employment and continuing education preparation, and small business and entrepreneurial resources—for the community patrons. Libraries recognize that for the public to be able to fully engage in and contribute to civic society, every individual must have access to the Internet via a broadband connection and the skills necessary to utilize its resources. As the Commission develops the NBP, ALA respectfully reminds the Commission that libraries serve multiple purposes in their communities. They provide no-fee access to a wide variety of resources; they provide information and digital literacy training to patrons; they support business entrepreneurs; and they are a small business employer.

I. Community Hubs

Public libraries go beyond stopgap measures in creating and supporting economic opportunity

² Cornwell, Lisa (January 27, 2009). *Economic woes boost library job resource use*. The Associated Press State & Local Wire, Cincinnati, Section; State and Regional. The Cincinnati/Hamilton County library saw use of its online resources reach an all-time high in 2008. Library Patrons at several Cincinnati area libraries come almost daily to search online for jobs and fill out online applications. See also: Suarez, Pamela. (December 29, 2008). *Library cards lend hand to businesses; Libraries offer plenty of free resources that can help businesses survive a recession -- without a government bailout*. The Miami Herald, section G; Pg. 8. South Florida librarians report they see an increase in the number of people coming in to the libraries for the business resources.

³ Manjarrez, C.A., Cigna, J. & Bajaj, B. (2008). *Making Cities Stronger Public Library Contributions to Local Economic Development*, the Urban League. This report also discusses library impacts and return on investment studies at the state and national levels. Available: http://www.urban.org/uploadedpdf/1001075_stronger_cities.pdf.

The public library has a long history of meeting the information needs of its community. As local communities change, so do the services libraries offer so that patrons are able to access the most relevant information resources they need to live full and productive lives. In today's economy, libraries across the nation are experiencing a constant demand for services related to job seeking and other employment issues. Today, library services commonly include, but are not limited to: job training and continuing education, resume writing, career counseling, and basic information literacy training, including digital literacy. These services most often require access to robust broadband.

At present, nearly 100% of public libraries are connected to the Internet, and in 71% of communities the public library provides the only no-fee public computer access. In 2008, 45% of libraries reported a connection speed of 1.5 Mbps or greater. Rural libraries are the most likely to report a low maximum connection speed of 768 Mbps (14%).⁴

By definition, the public library is a multi-user environment with patrons accessing a variety of websites and using a variety of applications. One patron might be downloading a large document while others upload pictures to a website from a personal storage device, file an online-only employment application, or read a website with multi-media applications embedded in it. All such uses are bandwidth intensive. In a multi-user environment such as the library, rather than determine a per workstation speed, it is more important to ensure the library itself has high capacity connectivity that allows for the fluctuating uses of bandwidth.

In 2007, there were 1.4 billion library visits or 4.9 thousand per capita. This demonstrates a continuation of an upward trend and an overall increase in library visits of 17% since 1998.⁵ Without question, libraries in all our communities are seeing an increase in use, particularly of their online resources. Because of the range of library services and the variation in size of the physical library, the number of patrons served varies by individual library outlet. In addition to stationary buildings, many libraries have book mobiles (often equipped with digital resources), or provide resources off-site in nursing homes, Boys and Girls clubs, and correctional facilities, for example. Some libraries incorporate employment training resources in their mobile branches bringing both broadband and valuable job related resources into the communities that need those the most.

Libraries average eleven workstations per building. In urban areas with high poverty levels this average rises to twenty-eight and in rural areas with high poverty rates the average is seven. Libraries across the board report the public access computers are almost always in use. In managing a public access workstation, the reality is that demand for a computer often out paces

⁴ Davis, et al. (2009). *Libraries Connect Communities 3: Public Library Funding & Technology Access Study*. Chicago: American Library Association. ("Libraries Connect Communities 3"). Available: http://ala.org/ala/research/initiatives/plftas/2008_2009/index.cfm.

⁵Henderson, E., et al. (2009). *Public Libraries Survey: Fiscal Year 2007* (IMLS-2009-PLS-02). Institute of Museum and Library Services. Washington, DC. Available: http://harvester.census.gov/imls/pubs/Publications/fy2007_pls_report.pdf. (state by state data is also available).

the number of computers available. Libraries are making every effort to accommodate the increase in patron demand for Internet access with 94% of libraries having some sort of time limit on the public access computers—about half limit use to 30-60 minutes.

Although 62% of libraries report there are fewer workstations than patrons who wish to use them at different times during the day, libraries recognize this challenge and are seeking creative solutions to increase availability for their patrons. Many successfully stretch their resources, by allowing patrons to use personal laptops (76% of libraries offer wireless Internet access) and personal Universal Serial Bus (USB) drives to extend library services. About three quarters of libraries report cost and space limitations are the main factors that influence whether to add computer work stations.⁶

Despite the very real challenges libraries face, they continue to offer patrons access to critical information resources. Libraries report providing access to educational resources, including online databases for K-12 and continuing education, is a critical library service. Also noteworthy is an increase in libraries reporting providing job-related services as a critical library service—increasing from 45% in 2006 to 66% in 2008.⁷

The added value libraries offer includes job training, information, and digital literacy programs

Libraries are uniquely qualified to offer additional services that make broadband access more useful to their patrons. Many libraries report that patrons filling out job applications are often first-time computer users and need basic skills to be able to complete the application. 91% of libraries offer formal training classes in general computer skills, 71% have formal classes in using software applications and 93% have training in general Internet use.⁸ It is important to note that in addition to providing access to the Internet, libraries subscribe to numerous online databases that provide patrons with access to current research and information on a variety of topics including: economic development, starting a small business, legal information, and career counseling. Libraries offer this suite of services to help ensure their patrons not only have access to valuable information, but have the skills necessary to evaluate and utilize them. In response to the economic downturn, many libraries are creating workshops and training classes on specific employment related topics. The following examples highlight the services and instruction provided by librarians in libraries.

- The H&R Block Business & Career Center provides patrons at the Central Kansas City Public Library with desktop and laptop computers, e-books and other online business resources, such as newspapers and business journals from around the country. For

⁶ Davis, et al. (2009). *Libraries Connect Communities 3: Public Library Funding & Technology Access Study*. Chicago: American Library Association. (“Libraries Connect Communities 3”). Available: http://ala.org/ala/research/initiatives/plftas/2008_2009/index.cfm.

⁷ *ibid*

⁸ Note: 91% of libraries offer formal *or informal* classes

patrons who need assistance, the Business Center staffs two business librarians, trained in resume and business plan writing as well as helping navigate the library's databases and traditional print resources.⁹

- The Cuyahoga County Public Library in Ohio runs The Library Career Center where career counselors employed by the library and certified in rehabilitation counseling, offer workshops in resume writing, interviewing techniques, career planning, basic computer skills for job hunters, social networking and job searching, and special workshops for “over 50 and out of work.”¹⁰
- The Business Library of the Brooklyn Public Library in New York has a number of business databases that provide up-to-date information for small business owners, as well as entrepreneurs just starting out. The library holds workshops that are open to the public with professional career counselors and other business experts. The library also has a “business telephone reference” help desk for people to call in and get help with business related questions (e.g., those on financial markets, companies and products, and business structure). Finally the Business Library sponsors, in partnership with Citi Foundation “PowerUP!” a contest for local entrepreneurs to enter a business plan where winners receive cash seed money to actually put the plan into action.¹¹
- The State Library of North Carolina (SLNC) was the recent recipient of a grant from the Institute of Museum and Library Services (IMLS) to launch a program, “to gather and share best practices for providing library-based employment services and programs to the unemployed.”¹² SLNC coordinated a statewide response to the severe unemployment crisis in the state by partnering with work force development organizations and public libraries across the state. The collaborative effort hosted regional workshops with North Carolina's Employment Services Commission and Department of Commerce workforce development professionals and librarians. The workshops drew on these professionals to provide information on employment related resources. JobSearch Workshops were presented from March 16-30, 2009 to 298 participants, representing 66 of North Carolina's 77 public library systems and two community colleges. Because of the success of the workshops, SLNC will be using the grant to help other state library agencies replicate the program in their states.

These are only a few examples of the ways in which libraries are responding to the economic crises in communities throughout the nation. There are programs by New York Public Library,

⁹ Stafford, Diane. (June 11, 2009). *Library's new Business & Career Center offers wealth of resources*. The Kansas City Star, Section A; pg. 12.

¹⁰ <http://www.cuyahogalibrary.org/careerexpert.aspx>

¹¹ <http://www.brooklynpubliclibrary.org/business/>

¹² <http://www.imls.gov/news/2009/091009.shtm>

King County Library System in Washington, Pima County Public Library in Arizona (one of 27 statewide Economic Development Centers), and others that have extensive career planning and business development related resources available to their patrons. Additionally, news sources around the country are providing testimonials from individual business entrepreneurs and job seekers using the library to either boost current business or better prepare for new employment.¹³

II. Business adoption and usage

The library as a small business

Libraries have a dual role of serving the information needs of the public while many also operate as a small business. As a small business libraries have broadband needs that are unique when compared to those of other types of small businesses. Clearly, libraries need high capacity broadband connectivity to provide the services that their patrons need. In today's library, broadband is no longer a luxury; it is as critical to run the "behind the scenes" library operations as it is to provide patrons the front end services they require. ALA urges the Commission to afford libraries the same consideration as other small business enterprises as it implements the NBP.

Broadband-enabled library services go beyond connectivity at public access terminals. Libraries also enable patrons who do have home access the ability to log on to the library's website from an outside location. Providing access to databases and other resources through their websites, libraries extend their reach beyond their walls. This service, however, requires a robust broadband connection on the part of the library.

Libraries need high capacity broadband to provide essential services to the general public

Libraries require stable and high capacity broadband service. As a multi-user setting, patrons access a variety of applications, websites, and other online resources at the same time the library's integrated library system (ILS) operates the online public access catalog (OPAC) and other activities necessary to running the library (e.g., managing a local area network). Many libraries are incorporating Web 2.0 applications into their websites to encourage patron participation. Libraries host blogs, use Twitter, Facebook and Second Life, post podcasts, and hold webinars to bring their resources to where their patrons are. All of these complex functions require broadband. In a multi-user environment, broadband must be high capacity that allows for fluctuating demand and scalability as demand increases in the future.

Libraries require access to broadband service that is scalable as needs increase. With many libraries reporting a steady increase in use, a connection that appears adequate today is likely to

¹³ One small business owner in Pikes Peak used the local library's new electronic database, BusinessDecision, to determine where to locate her store front based on demographic information she gleaned from the database. Tonn, Rebecca. (December 12, 2008). *Pikes Peak Library District offering demographic data for budding entrepreneurs*. Colorado Springs Business Journal. Dolan Media Newswires.

be inadequate in the near future. This fact is compounded when patrons routinely access bandwidth heavy applications and complex websites (e.g., websites that incorporate multi-media or high-definition online video). ALA advocates that libraries seek forward-thinking solutions to their connectivity needs to allow for future growth, to help make them more “future-proof.” In many cases, this is a fiber-optic cable based solution.¹⁴ In fact, ALA contends that by providing a library with a fiber connection the entire community is likely to benefit from additional build-out from the library to both businesses and residential areas. Providing anchor institutions such as the library with high capacity broadband service will result in greater broadband availability and bring service to areas where availability is currently inadequate. Such action will also ensure a more robust infrastructure in areas where service is more readily available. The Commission should support the high capacity bandwidth needs of the library in the NBP.

Effective negotiation requires open dialog between service providers and small businesses

ALA commends the Commission for seeking input on the types of information disclosures broadband service providers should make to potential customers. Though libraries provide access to advanced applications, many libraries are not equipped with adequate IT support, nor are librarians necessarily familiar with negotiating with service providers (this is especially true in small and rural libraries). Libraries would be able to make better informed decisions regarding the most cost effective service options if service providers readily disclosed information regarding availability, upstream and downstream speeds, and other information affecting quality of service. ALA wishes to point out that these libraries should not be unintentionally penalized by their lack of negotiation skills as the Commission develops the NBP and considers the valid business concerns of service providers and those of entities that depend on fair and open negotiations to be able to provide quality service to their constituents—i.e., the public library and its patrons. ALA supports the Commission in establishing fair disclosure measures for service providers.

III. Broadband’s role in regional economic development

Libraries are critical institutions in supporting regional economic development

Libraries that partner with local or state economic development agencies redouble the reach and impact of these efforts. At the same time, libraries are “reducing the operation costs and broadening the outreach of other local workforce development agencies, contributing to a stronger community network for job readiness and worker “retooling.”¹⁵ Library staffs continue to develop innovative programs and services to meet the growing demand of their patrons,

¹⁴ Windhausen and Visser (2009). *Fiber to the Library: How Public Libraries Can Benefit from Using Fiber Optics for their Broadband Internet Connection*. Available: http://www.wo.ala.org/districtdispatch/wp-content/uploads/2009/11/fiberbrief_-published.pdf.

¹⁵ Manjarrez, C.A., Cigna, J. & Bajaj, B. (2008). *Making Cities Stronger Public Library Contributions to Local Economic Development*, the Urban League. Available at http://www.urban.org/uploadedpdf/1001075_stronger_cities.pdf.

evidenced by the previous examples. Libraries also report an increase in patrons coming to the library to access government forms to apply for unemployment benefits, social security, and other government services.¹⁶

- The St. Tammany Parish Library designed a new Business Resource Center in response to local devastation from hurricane Katrina. Not only does the Resource Center provide patrons access to a wealth of local, regional, and national resources for entrepreneurial enterprise including “competitive analyses of specific industry sectors, demographic information and consumer spending profiles so that business owners can better identify their customer base to start or expand their businesses,” but the Center also makes available two meeting rooms for use by local business entrepreneurs at no cost. “The meeting rooms provide home-based businesses to have a professional setting for meetings with potential clients or investors for activities like employee training and hiring interviews.”¹⁷
- Michigan Works! An area employment services agency, partners with a branch library to staff a one-day-a-week satellite office where community members can register for unemployment benefits and seek job search counseling. “The partnership with the library branch has expanded employment services” to counties outside the agency’s original service area.¹⁸

These two libraries exemplify efforts of many libraries that create innovative responses to local economic strife. Even as economies begin to show signs of rebounding, the business centers will continue to provide new workers and those changing careers with valuable resources. Libraries contribute to the long term economic recovery of their communities responding during times of crisis, while also staying the course as long-standing and stable community anchor institutions.

IV. Government-provided social benefit programs

Information literacy skills are critical to navigating online social benefit forms

ALA notes many libraries report the complexity of official websites and the forms required for government services are often so complex that many patrons cannot successfully complete an application. This problem is likely exacerbated in vulnerable populations that may be accessing the Internet for the first time when filing for social services. As discussed in more detail below, the library is augmenting its information services with social services support—particularly as many government agencies move to online applications and referrals.

V. Workforce development

¹⁶ U.S. Public Libraries and E-Government Services. (2009). Available:

<http://www.ala.org/ala/research/initiatives/plftas/issuesbriefs/IssuesBrief-Egov.pdf>

¹⁷ Devine, Carroll. (July, 6 2008). *Business resource makes its big debut; Library's new center has tips, meeting site.* Times-Picayune, St. Tammany Picayune; Pg. 99. The Times-Picayune Publishing Company.

¹⁸ Reiter, Mark. (May 13, 2009). *Library a resource for area job seekers.* Toledo Blade, Neighbors; Pg. M11. The Blade.

The value of the public library's suite of services cannot be overstated

The Commission seeks input on the various ways broadband services advance community development, worker training, entrepreneurial, activity, and economic growth. ALA respectfully reiterates the unique and critical role of the public library in supporting local communities as they struggle to stay viable as our society shifts from an industrial market to a knowledge-based economy.

Beyond providing basic services, libraries enrich their patron's information needs with resources in a variety of formats. Librarians, experts in search technique, know that with the move to online resources, individuals seeking employment, business information, and skills training, may need assistance now more than ever. Specific populations, such as people recently laid off from long term employment, non-native English speakers, the older workforce, and new graduates often need targeted support.

Libraries not only provide access to federally supported job training and placement programs, they are also creating locally relevant employment services—often in conjunction with local or regional employment and workforce development agencies. The success of many workforce development initiatives requires the participants have basic skills necessary to navigate online resources.

ALA commends the Commission for soliciting input on a wide range of critical issues as it assembles the National Broadband Plan. ALA recognizes the many challenges faced by the Commission and applauds its efforts to put into place a comprehensive plan that will bring lasting social and economic benefit to all areas of the nation.

Thank you for considering our comments.

Respectfully submitted,



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