

Before the  
**Federal Communications Commission**  
Washington, DC 20054

In the Matter of: ) GN Docket No. 17-199  
Inquiry Concerning the Deployment of )  
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  
American Library Association**

Our nation’s 120,000 libraries are leaders in creating, fostering, using, extending and maximizing the potential of the internet for research, education, economic opportunity and the public good generally. We appreciate the opportunity to comment on this important proceeding. These reply comments will focus on two specific areas particularly relevant to libraries and their public missions: 1. the criteria and standards for broadband deployment to public institutions like libraries and schools, and 2. the role of mobile internet access in the advanced telecommunications ecosystem.

**The Broadband Benchmark Target for Libraries Articulated In The E-rate Program’s  
*Modernization Order* Should Be Refined.**

As the Commission states, this inquiry is to determine if “advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion.”<sup>1</sup> The federal E-rate program is critical in helping make this determination for our libraries and schools. The Commission’s *Thirteenth Section 706 Report Notice of Inquiry* is an important milestone in the effort to fulfill its responsibility to connect America’s libraries to the advanced telecommunications services they need to provide communities with critical access to the internet.

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<sup>1</sup> 47 U.S.C. § 1302(b).

Over the last three years, the Commission's 2014 modernization of the E-rate program has catalyzed tremendous progress in making advanced telecommunications services available in America's libraries. During the major review and modernization process of the E-rate program in 2014, ALA filed numerous comments and overall we are pleased with the Commission's consequent reforms made to the program. Thanks to E-rate modernization, for the first time in years libraries are filing for and receiving Category 2 funds. And ALA supports more options for fiber that encourage applicants to pursue higher capacity broadband and increase competition to address lack of availability/affordability which is a huge historical barrier for libraries.

Our purpose in this filing is not to review or reiterate the many E-rate reforms, but to focus on one particular subject that is highlighted in this Section 706 inquiry. In Section II D of the Section 706 Inquiry the Commission asks for comments on the "deployment of advanced telecommunications capability to schools and classrooms." For schools the ALA supports the comments filed by the State Educational Technology Directors Association (SETDA)<sup>2</sup> and EdLiNC<sup>3</sup>. In brief, both these organizations support the broadband benchmarks established by the FCC in 2014 as part of the E-rate Modernization process. Specifically, EdLiNC states that, it "Endorsed these [broadband] goals in 2014, asserts that they remain valid and useful now, and urges the Commission to allow them to remain in place."<sup>4</sup> In addition to school bandwidth targets the 2014 E-rate Modernization process also established a library bandwidth target based on community population. For libraries serving less than 50,000 population the FCC recommended a minimal broadband speed of 100 Mbps; for libraries serving more than 50,000 population it recommended a speed of at least 1 Gbps.<sup>5</sup>

On September 7, 2016, the ALA filed comments<sup>6</sup> in response to the Commission's 2016 *Broadband Progress Report NOI*. We encourage the Commission to review our 2016

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<sup>2</sup> SETDA Comments on the *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, GN Docket No. 17-199, Thirteenth Section 706 Report Notice of Inquiry (2017). Comments filed September 20, 2017 (<https://ecfsapi.fcc.gov/file/10920496725796/SETDA%20706%20NOI%20Comments%20Final%202017.docx>).

<sup>3</sup> EdLiNC Comments (<https://ecfsapi.fcc.gov/file/1092182507327/EdLiNC%20Section%20706%20Filing.docx>).

<sup>4</sup> EdLiNC Comments, p 2

<sup>5</sup> *Modernizing the E-rate Program for Schools and Libraries*. WC Docket No. 13-184. July 11, 2014. ([https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-14-99A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-14-99A1.pdf)).

<sup>6</sup> ALA Comments *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, GN Docket No. 16-245, Twelfth Section 706 Report Notice of Inquiry (2016). Comments filed on September 7, 2016.

comments, most of which are still relevant today. While we will not—verbatim— repeat our 2016 comments here we do want to reiterate these key points:

- We ask that reference to the library broadband targets be included in the final report that will be published as a result of this inquiry; and
- Though these library broadband targets are useful at the aggregate level for public policy purposes, more granular bandwidth targets are needed for the library practitioner community.

Regarding the second bullet above, the ALA proposes to work cooperatively with the Commission to explore various alternatives to the current bandwidth targets. (For example, basing bandwidth targets on Internet connected devices will be a useful metric because it is flexible and can thus change as Internet services continue to evolve.) We think changes are needed to both better serve the library community and better inform the Commission on the progress of our libraries to attain the bandwidth they need.

### **Mobile Internet Access Should Not Be Considered Part Of The Deployment Of Advanced Telecommunications Capability.**

The library provides the means (computers with internet access) necessary to view and interact with content online, particularly for persons who do not have adequate (or any) broadband access at home. But also: librarians specialize in collecting and hosting robust databases of information, digitizing unique community artifacts and records, engaging community conversations through social media, recording and sharing oral histories, developing innovative media and preserving the free flow of information and research over the public internet for all people. Over 90 percent of public libraries offer their patrons access to commercial reference and periodical databases from thousands of sources, most offering that access to consumers at home.<sup>7</sup> Increasingly, the content offered is multimedia, with a heavy reliance on streaming video. As such, libraries have a vested interest in supporting robust broadband access to the home so that patrons can take full advantage of the resources offered.

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([https://ecfsapi.fcc.gov/file/1090767678599/American%20Library%20Association%20Section%20706%20Comments%209\\_7\\_16.pdf](https://ecfsapi.fcc.gov/file/1090767678599/American%20Library%20Association%20Section%20706%20Comments%209_7_16.pdf)).

<sup>7</sup> Larra Clark & Karen Archer Perry, “After access: Libraries and Digital Empowerment,” (Dec 2015), [http://www.ala.org/advocacy/sites/ala.org.advocacy/files/content/ALA%20DI%20After%20Access\\_final\\_12%2017%2015.pdf](http://www.ala.org/advocacy/sites/ala.org.advocacy/files/content/ALA%20DI%20After%20Access_final_12%2017%2015.pdf) (last visited Jul 15, 2017).

The possibility that the FCC may consider mobile internet access as part of universal deployment of advanced telecommunications capability is troubling because the capabilities of mobile service do not yet meet those of wired broadband access and many services are subject to data caps, which will disproportionately hurt consumers with lower incomes. As the comments of the North Carolina Broadband Infrastructure Office note, “[m]ost mobile wireless services do not currently offer the reliable bandwidth needed for advanced applications. Further, the imposition of data caps can make it unaffordable to run advanced applications, such as video.”<sup>8</sup>

We agree with many of the commenters that internet access via mobile services is a complement to, not a substitute for wireline broadband access to the home.<sup>9</sup> Specifically, we agree with Microsoft that, “[m]obile broadband and fixed broadband services currently are complementary, rather than substitutable, ways to achieve advanced telecommunications capability and should not be conflated in the Commission’s measurements at this time. Common restrictions on mobile usage such as tethering prohibitions and data caps as well as generally lower speeds result in use case scenarios that differ from those afforded via most fixed.”

Furthermore, altering the standard for advanced telecommunications capabilities for mobile technologies will not likely help people in rural communities. We note the comments of Sharon Stover, whose research based on rural populations in Kansas and northern Maine using a free, library-loaned hotspot program demonstrates that “mobile phone-based services are spotty and unreliable in many rural regions.”<sup>10</sup>

To the extent that the FCC explores the deployment of mobile broadband access, it must be done separately from its historic measurement of advanced fixed access deployment.

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<sup>8</sup> See Comments of North Carolina Broadband Infrastructure Office (<https://ecfsapi.fcc.gov/file/1092112089195/NCBIO%20comments%20to%2013th%20section%20706%20report%20GN%20Docket%20No%2017-199.pdf>).

<sup>9</sup> See Comments of Institute for Local Self Reliance and Next Century Cities; Comments of Public Knowledge; Comments of New America’s Open Technology Institute; Comments of INCOMPAS; Comments of Microsoft; Comments of Mimosa; Comments of NTCA

<sup>10</sup> See Comments of Sharon Stover ([https://ecfsapi.fcc.gov/file/1092167930120/FCC%20Comments%20in%20proceeding%20%2017-199%20Stover%209\\_21\\_17.pdf](https://ecfsapi.fcc.gov/file/1092167930120/FCC%20Comments%20in%20proceeding%20%2017-199%20Stover%209_21_17.pdf))

## **Conclusion**

In conclusion, we ask the Commission to explicitly incorporate the library standard into this inquiry. Moreover, as the Commission revisits these standards, we suggest it consider adoption of a standard that includes more granular guidance such as targets based on the number Internet connected devices. Further, we recommend the Commission not include mobile services in its review of the deployment of advanced telecommunications capacity.

Respectfully submitted,

/s/

Robert Bocher  
Senior Fellow, ALA Office for Information Technology Policy

/s/

Ellen Satterwhite  
Fellow, ALA Office for Information Technology Policy

/s/

Marijke Visser  
Associate Director and Senior Policy Advocate, ALA Office for Information Technology Policy

/s/

Larra Clark  
Deputy Director, ALA Office for Information Technology Policy and Public Library Association

/s/

Alan Inouye  
Director, ALA Office for Information Technology Policy