

ALA American Library Association

July 23, 2009

The Honorable Larry Strickling
Assistant Secretary of Commerce
Administrator
National Telecommunications and Information Administration
U. S. Department of Commerce
1401 Constitution Ave. NW
Washington, D. C. 20230

Dear Assistant Secretary Strickling:

The American Library Association (ALA) congratulates you on your recent confirmation as Assistant Secretary of Commerce. We would also like to applaud you and your staff on releasing the Notice of Funds Availability (NOFA) to implement the Broadband Technologies Opportunities Program (BTOP).

The ALA represents more than 100,000 libraries, including 16,542 public library outlets, in communities across the country. Each of these libraries plays a vital role in supporting job searches and career development, small business creation, homework and school research, access to online education, training, and E-government services through its no-fee public access terminals. In fact, several recent news accounts report that library users are waiting in line to use public access terminals, and research indicates that most libraries have insufficient broadband connectivity for current and anticipated needs.

Therefore, as community anchor institutions, many libraries are committed to applying for funding for broadband connectivity to better serve the increasing needs of their communities. Congress's commitment of \$7.2 billion in funding for broadband connectivity via the American Recovery and Reinvestment Act (ARRA) was viewed as an opportunity to connect all of our communities in a cost-effective, inclusive way. However, the ALA believes the release of the first-round NOFA raises significant concerns and hurdles for libraries considering applying for broadband funding. These concerns stem from what was perceived as the ARRA's giving libraries, as anchor institutions, priority with regard to the five statutory purposes. However, the NOFA in effect de-prioritizes libraries and discourages them from applying for funding in a number of ways.

The application of the unserved and underserved limitations to libraries essentially disqualifies a significant proportion from applying for broadband infrastructure funds. While the ARRA applies the terms of unserved and underserved only to household consumers, the NOFA extends those terms to libraries and other anchor institutions. The unintended consequence requires that in order for libraries, as anchor institutions, to qualify for broadband infrastructure funding, a library must serve as least one unserved or underserved

area. Libraries located in urban and suburban communities will be unduly penalized even though they are well-positioned to provide internet access via broadband connectivity to everyone in their community. The library community is hopeful that subsequent NOFA funding opportunities will take into consideration this contradiction in the ARRA's intent and the NOFA's application. To rectify this situation, we respectfully ask that the definition requirements of "unserved" or "underserved" not be applied to libraries.

The ALA perceived the ARRA as an invaluable opportunity to build out high-speed, future-proof connectivity (such as fiber-optic technology) to all public libraries in the country. As currently written, the NOFA raises considerable barriers to the realization of this shovel-ready vision. Specifically, the NOFA discourages the promotion and prioritization of high-speed connectivity by adopting a single definition of broadband (768 kbps download) that is simply inadequate for libraries – now and in the future. It is essential, in order to meet our patrons' growing demands for robust connectivity, to give priority to high-speed technologies to actualize the ARRA's challenge of investing in a broadband infrastructure that anticipates and meets future demand.

In addition, investment in high-speed connectivity (such as fiber and other technologies), is not favorably supported by the NOFA's current scoring system. Specifically, the NOFA does not give specific scoring "points" for applications that provide high-capacity broadband service to libraries. Therefore, service providers are not incentivized to build broadband networks to libraries (or other community anchor institutions). Points should be awarded to applicants (including service providers) that apply to build out high-speed broadband connectivity to libraries.

These are some of the barriers libraries currently face when considering applying for broadband funding under the NOFA. These concerns reiterate the challenges raised in a letter sent to you on July 14, 2009, from the Schools, Health and Libraries Broadband (SHLB) Coalition – for which the ALA is an active member. We anticipate you and your staff will be receptive to our situation. In your opening comments at the July 7, 2009, NTIA/RUS Broadband Application Training Workshop, you recognized the importance of libraries by stating libraries who participated in aggregate applications would be stronger under the NOFA scoring schema than those from a single library. We applaud your recognition of the central role of public libraries in all communities across the country. In fact, nearly 100% of public libraries provide public access to the Internet at no charge to their users, and in 71% of communities, they are the only source of no-fee public Internet access. This number rises to 79% in rural areas. It is unfortunate such significant barriers exist for libraries interested in applying for funding in their roles as a community anchor institution. The ability of our libraries to meet community needs is in jeopardy – especially when library use has heavily increased across the country in these difficult economic times.

We appreciate you and your colleagues' diligent efforts to date and do not underestimate the enormity and the importance of the task at hand set out by the ARRA. Inclusion of libraries in the build-out of the broadband infrastructure will contribute towards a more cohesive and efficient network infrastructure for America's communities and help ensure that high-speed

broadband will reach the greatest percentage of the population. Libraries with high-capacity broadband connections are critically important in the 21st century for providing essential services to millions of people every day.

Sincerely,

A handwritten signature in black ink that reads "Emily Sheketoff". The signature is written in a cursive, slightly slanted style.

Emily Sheketoff
Executive Director, Washington Office
American Library Association