



November 28, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Notice of Ex Parte Communication, WC Docket No. 13-184

Dear Secretary Dortch:

The Urban Libraries Council ("ULC") applauds the FCC's recognition of the unique funding needs that large city libraries encounter to provide robust WiFi services in their communities. The attached research, commissioned by ULC and undertaken by a Stanford University researcher, demonstrates that a small number of libraries provide WiFi service to a large percentage of the nation's users. These libraries require a budgetary allocation for internal connections significantly higher than the Commission proposed in its July E-Rate Modernization Order.

As the ULC-commissioned research demonstrates, libraries with the highest number of users should be eligible for a higher level of support. Using user levels, along with population, aligns with the goal of providing increased funding for public WiFi service to those libraries that need it: **libraries systems that serve the most users**. Including libraries with a reported user level in the top 5% of the data would ensure that all outlier libraries are included, incorporating the additional libraries with heavy usage of WiFi that are not necessarily in the largest cities. **Allowing the heaviest users to qualify for needed funding guarantees that the top 7% of libraries, which serve over 63% of all public WiFi users, are eligible to receive the requisite funding.**

If the FCC ultimately chooses to use population levels as the sole basis for determining the higher budgetary allocation, it still should ensure that libraries serving the majority of WiFi users are eligible for the increased funding. As the enclosed analysis confirms including libraries in the Institute of Museum and Library Sciences ("IMLS") locale category 11 would make only 24% of the outlier libraries eligible. Many libraries in large cities and urban communities would not be eligible. These include libraries in major cities such as Miami and Orlando, Florida; Cincinnati, Ohio; Minneapolis, Minnesota; and Columbia, South Carolina.

To ameliorate such a result, the Commission should make additional libraries eligible, such as libraries in IMLS classification 12 locales with populations above 100,000. These libraries, added together with libraries in classification 11, serve 90% of the outlier library users in all IMLS city classifications. The Commission should also include an additional 122 outlier libraries that are in urban counties with populations over 250,000 (IMLS classification 21). Many of these libraries serve major cities with populations above 250,000 and neighboring urban counties.

By adjusting the formula to include libraries in Category 21 areas with populations over 250,000 and libraries in medium-size cities with populations exceeding 100,000 (Category 12), the FCC can capture 300 of the outlier libraries across all cities, suburbs, towns, and rural areas. These libraries represent a large portion of the nation's library WiFi user base. Libraries in the following areas now would be eligible for the higher budgetary allocation:

IMLS Classification 21

City and County System

- Miami Dade County Public Library
- Richland Library
- The Public Library of Cincinnati/Hamilton County
- Hennepin County Public Library
- Orange County Library System

Serving

Miami, FL
Columbia, SC
Cincinnati, OH
Minneapolis, MN
Orlando, FL

Urban County System

- Howard County Public Library
- Prince Georges' County Public Library
- Baltimore County Public Library
- County of Los Angeles Public Library
- St. Louis County Public Library

Serving

Howard County, MD
Prince Georges' County, MD
Baltimore County, MD
Los Angeles County, CA
St. Louis County, MO

IMLS Classification 12

- | | |
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| • Madison, WI | • Mobile, AL |
| • Syracuse, NY | • Little Rock, AR |
| • Baton Rouge, LA | • Hartford, CT |
| • Savannah, GA | |

In order to focus funding on where it is most needed, the FCC must ensure that library systems that provide the highest levels of WiFi service be eligible for the highest budgetary allocation. The enclosed analysis confirms that including library systems in IMLS locale categories 11, 12 and 21 would ensure that libraries that most need the higher reimbursements are eligible to receive them.

Sincerely,

A handwritten signature in black ink, appearing to read "SBenton", with a large, stylized "S" and "B" at the beginning.

Susan Benton
CEO and President, Urban Libraries Council

cc: Jon Wilkins
Reed Hundt