

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal Services Support)	WC Docket No. 09-197
)	
Connect America Fund)	WC Docket No. 10-90
_____)	

COMMENTS OF THE URBAN LIBRARIES COUNCIL

The Urban Libraries Council (“ULC”) hereby responds to the Notice of Proposed Rulemaking released on June 22, 2015 in the above-captioned proceeding.¹ ULC commends the FCC for launching this ambitious and bold review of the Lifeline program and welcomes the opportunity to comment on the *Notice*.

I. BACKGROUND

Public libraries utilize a variety of services and capabilities to improve the lives of people in their communities and broadband services have become essential to their mission. As the Commission is well aware, libraries have been at the forefront of broadband adoption and digital inclusion efforts for many years and provide not only free and open Internet access, but also the training and guidance needed to support meaningful broadband use in the broader community

¹ See *Lifeline and Link-Up Reform and Modernization*, WC Docket No. 11-42, Notice of Proposed Rulemaking, FCC 15-71 (2015) (“Notice”).

and at home. Urban libraries, in particular, are acutely aware of the transformative role that the widespread availability of broadband services and technologies play in the lives of community members—especially lower-income individuals. Urban libraries work with partners across their communities on a daily basis to ensure that the services offered in the libraries, including broadband access, are continued at home.

ULC is currently developing a briefing paper on the role that public libraries play in broadband adoption. The paper, which ULC will file in this proceeding, will highlight the innovative practices urban libraries are implementing to ensure that home broadband adoption rates increase in low-income households. This briefing paper will also explore why leading urban libraries believe that home broadband is essential, provide a detailed look into library-led local broadband adoption strategies and discuss how libraries are allocating resources for their broadband adoption work.

II. OVERVIEW

ULC recently participated in the Commission's proceeding to reimagine the E-rate program and this experience provides it with a unique perspective on the reforms needed to modernize the Lifeline program. By increasing E-rate funding and providing much-needed flexibility for funding applicants, the newly reformed E-rate program is allowing public libraries to better serve their communities through increased broadband services and technologies. Because of the increase in E-rate funding, urban libraries are now able to expand their broadband services and capacity to the great benefit of their communities.

Much like it did in its E-rate proceeding, the Commission's view of the strategic mission of the Lifeline program must evolve. While Lifeline has been vital in increasing the availability of traditional telecommunications services to lower-income individuals, the program now must

focus on broadband services given their importance to the daily lives of individuals. Affordable broadband services are a compliment to the cost-free broadband services that public libraries provide in their communities every day, and the Commission must update the program to broaden the deployment of these services to lower-income individuals. ULC agrees with the Commission's conclusion in the *Notice* that including broadband as an allowable service will benefit lower-income individuals by ensuring that they can more easily access such services.

As it did in the E-rate proceeding, the Commission should also provide funding flexibility to allow the Lifeline program to better serve local needs. In particular, the Commission should strongly consider funding pilot programs to review different funding models. In the absence of low-cost commercial broadband service in many urban areas, some libraries have created programs such as Wi-Fi hot-spot lending programs in New York, St. Paul and Chicago. The FCC should consider funding these community-based programs when looking for solutions to increase home broadband adoption.

