

September 11, 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”) hereby submits a study that confirms that the \$2.30/square foot budget allocation method adopted by the FCC in the E-rate Modernization Order would result in the inequitable distribution of E-rate funds across urban, suburban, town and rural library systems. The study, commissioned by ULC and undertaken by a Stanford University researcher, is based on data collected by the Institute of Museum and Library Services on public libraries and has been shared with them.

Among other conclusions, the study confirms the following:

- Of the city libraries, 295 library systems represent the **majority** of the WiFi users in the United States. These 5 percent of all libraries support **63% of the WiFi user base**.
- For cities and other larger library systems (in the top 5% by usage or by size), the square footage did not increase at proportional rate to users – unlike rural, town and most suburban systems.
- For these libraries, the size of the library by square footage was the worst predictor of WiFi costs.

These findings illustrate that any equitable E-rate budget allocation metric adopted by the FCC must address the costs, needs and usage of all libraries, including the largest library systems (either by size or by usage level ). Further, any

reimbursement formula that does not account for larger systems will necessarily adversely affect cities and the majority of public library WiFi users in the United States.

ULC urges the FCC to review this important research to better understand not just the largest public library systems, but the needs across all public libraries – urban, suburban, towns and rural communities. Equitable access to adequate E-rate funds across all types of communities is essential to building healthy communities across the United States.

Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/

Susan Benton

CEO – The Urban Libraries

Council

Attachment