

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Ensuring Children’s Safe Use of Screens WC Docket No. 26-133
and E-Rate-Funded Services

Modernizing the E-Rate Program for WC Docket No. 13-184
Schools and Libraries

Establishing the Emergency Connectivity WC Docket No. 21-93
Fund to Close the Homework Gap

Promoting Fair and Open Competitive WC Docket No. 21-455
Bidding in the E-Rate Program

**COMMENTS OF THE ASSOCIATION FOR RURAL AND SMALL LIBRARIES AND
THE URBAN LIBRARIES COUNCIL**

I. INTRODUCTION AND SUMMARY

The Association for Rural and Small Libraries (“ARSL”) and the Urban Libraries Council (“ULC”) respectfully submit these comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, FCC 26-41, concerning the future of the E-Rate program.

ARSL and ULC collectively represent a significant portion of all public libraries across the United States and urge the Commission to preserve and strengthen E-Rate for all eligible public libraries—urban, suburban, rural and Tribal. Further, ARSL and ULC ask the Commission to reject proposals that would limit, phase out or sunset support based on generalized measures of broadband availability rather than reliability, affordability and community need.

I. Introduction

Public libraries are essential public infrastructure that must be preserved for future generations. They are trusted, accessible institutions that advance literacy across a lifetime, support economic opportunity, and strengthen the nation’s civic and social fabric. Libraries are leaders in workforce development, small-business support, digital inclusion, and career navigation. They provide essential access to physical and mental health resources, and support families. In communities across the country, libraries are often the only reliable and welcoming places where people can use technology, develop skills, and connect to public services.

- Numerous studies find a high economic rate of return for investment in public libraries. A recent study from the University of South Carolina found that that return to generally be \$5-6 for every \$1 invested, and that critically, such funding remains “an excellent investment in good times and bad. "[Furthering Our Understanding of the Economic Value of Public Libraries](#)"
- A September 2026 poll by the [Knight Foundation](#) and NORC at the University of Chicago found that 93% of Americans view their local public library as an essential or valuable public service.
- Public libraries are the gold standard for highly efficient use of public funds. In Arkansas, a federal block grant provided libraries statewide with access to 50 databases for a total of \$850,000. Individually, institutions in the state would pay \$53 million in taxpayer funds for the same resources, according to the state library.

Like state passthrough funds, **many libraries rely on collective negotiation of broadband service and discounts by participating in E-Rate application networks and cooperatives.** This is highly efficient use of taxpayer funds, especially in rural communities served by small libraries who cannot negotiate individual service and urban communities where cost is driven by the necessity of enterprise level connectivity.

These functions depend on robust, affordable, and continuously evolving broadband connectivity. E-Rate is a foundational public investment that enables libraries to deliver essential services to students, workers, entrepreneurs, families, older adults, and residents who otherwise may be unable to participate fully in education, employment, health care, government and civic life. Any reduction or elimination of essential E-Rate funding would have ripple effects across the economy and public library systems including closures of libraries, who rely on E-Rate to have the ability to check out books and provide public access to the internet.

- The Stonington Free Library in Connecticut demonstrates the essential need for E-Rate continues. “This funding makes it possible for a small library like ours to provide 21st-century technology to our patrons. As a small stand-alone library, we do not have the resources of an IT department, or a dedicated budget for technology initiatives.”
- In Fulton County, Georgia, for example, where users log 36,000 hours a month of PC usage, the elimination of E-Rate funding would have significant budget implications of approximately \$200,000. Without this funding, the library would be limited to reduced broadband speeds through the county provider.
- Additionally, Fulton County’s central library in Atlanta is home to the only Teen Tech Center in the state that serves as a model nationwide.
 - Teens in the community do not merely see the center as a place to meet friends. Each year, young people that use the center compete for scholarships, with one teen receiving a \$40,000 scholarship.

- Teens also routinely use the center for innovative projects, including the creation of software that was nationally recognized last year.
- The center is a strong example of public-private partnerships and is sponsored by Best Buy, which provides equipment and other resources. In addition, a core requirement of the partnership is that the library provides the infrastructure necessary to support it.
- **Greatly reduced connectivity poses a serious threat to programs like these that are proven effective.**

Nearly three decades of progress connecting libraries to broadband should be understood as evidence that E-Rate works—not as evidence that its work is finished, as lack of connectivity remains an ongoing concern for millions of Americans in communities rural and urban.

The Commission’s inquiry appropriately recognizes that schools and libraries will require increasing levels of connectivity over the next five to ten years, including connectivity sufficient to support artificial intelligence (“AI”) tools and other emerging technologies. Those anticipated needs demonstrate why the Commission should preserve and modernize E-Rate rather than narrow or sunset the program.

The Commission should preserve a universal E-Rate program that recognizes the substantial impact of ensuring connectivity by providing discounts to libraries in every type of community.

II. Broadband Availability Does Not Equal Affordability, Reliability, Capacity, or Competition

A. Institutional broadband needs differ from residential broadband availability

The Commission should not equate the presence of residential broadband providers in a community with the cost or adequate institutional library connectivity. Public libraries are community anchor institutions that require customized, enterprise-grade service capable of supporting large numbers of simultaneous users, public-access computers, wireless networks, staff operations, digital programming, cybersecurity protections and increasingly sophisticated online applications.

A broadband map may show service availability at a location, but does not demonstrate the library has access to affordable, secure, scalable enterprise-grade service. In addition, residential broadband may be technically available while remaining unaffordable to the residents who depend on the library for Internet access, devices, digital skills, and assistance.

According to a [report by Broadband Clusters](#), in Orlando, Florida, 22% of households in the area remain without access to broadband, and in Houston, Texas, that number is 28%. The same report found that in FY 2024, 77% of E-Rate funds went to communities where 14.2 million households lack home internet. With those figures in mind, the study raises an essential question: “With \$1.8 billion (64%) of 2024 E-Rate spending going to recurring internet bills rather than

one-time infrastructure, and with 14.2 million households in those communities still lacking home internet access, can E-Rate's core objectives be considered met?"

The relevant question is not simply whether broadband is technically available somewhere in the surrounding area. It is whether the library can obtain the level of service necessary to fulfill its public mission at a sustainable cost. Libraries also face recurring connectivity expenses. Bandwidth, network equipment, cybersecurity, maintenance, upgrades and technical support must be funded year after year.

Further, public libraries increasingly operate in a Bring Your Own Device environment. E-Rate does not subsidize the laptops, tablets, and smartphones patrons bring into library buildings. Instead, it supports the shared connectivity infrastructure that allows those school and privately purchased devices to become useful tools for education, homework, employment, government services, entrepreneurship, and increasingly AI-enabled applications. This model is inherently efficient: a single investment by E-Rate in robust public broadband at a library and internal connections can support thousands of patron devices without requiring public funds to purchase individual endpoints. The growth of BYOD therefore increases cost-effectiveness of E-Rate.

Connectivity is not a one-time construction project that can be declared complete once fiber reaches a building. It is an ongoing operating necessity whose cost and capacity requirements increase as libraries expand their services and as residents rely on them for more aspects of daily life.

B. Residential availability does not mean that residents can afford service

Broadband may be available in a populated census tract or neighborhood while remaining unaffordable for many households. Rural coverage has become more available but is still inadequate and often unaffordable not just for libraries but for the families they serve. This is shown by:

- This experience is shared by Live Oak Public Library, which has 14 branches in Chatham County, largely rural Liberty County, and the City of Savannah. According to CGIC, the Broadband Quality Score (BQS) measures the quality of broadband services in a local area. In 2025, the Chatham County score was 53.3 and the Liberty County score was 59.9 out of a possible 100. As high-speed internet is increasingly seen as a “super determinant of health” the public library’s ability to provide high-speed broadband internet to its patrons remains an important service to this community.

In addition, 15 million of the 18 million U.S. households lacking broadband were located in urban areas where service was available but unaffordable for many families already confronting housing and food insecurity. For these residents, the public library is not a redundant internet provider. It is essential community digital infrastructure.

- The Nashville Public Library attests to this need in its own community: “Whether paying bills, filing taxes, applying for jobs, completing schoolwork, accessing government services, or connecting to essential resources, public libraries help fill the very real

internet gap within our communities—and are often the only institution providing this level of reliable, free, high-quality and trusted access to those who need it.”

A decision to reduce E-Rate support based on generalized measures of residential broadband availability would therefore risk withdrawing support precisely where libraries are needed most: in communities where service may exist in theory but remains inaccessible, unaffordable or inadequate in practice.

III. E-Rate is Essential to all Public Libraries

E-Rate should recognize library realities not just based on location, usage, or population, but on the fairest marker of community need, free lunch. Instead of focusing on whether rural or urban challenges are more substantial, the commission should continue to be a needs-based program for low-income communities.

Further, rural and urban libraries each have significant if at time different cost challenges in providing adequate service for their communities.

- It has been well documented including by the Commission that rural communities experience provider scarcity, long distances, high construction costs and a smaller tax base. In addition, the recent disruption of federal passthrough funds supporting state libraries demonstrated that rural libraries will not be able to remain open if existing federal programs like E-Rate sunset.
- In urban areas, a branch serving hundreds of thousands of visits and digital connections annually does not have the same network requirements as a facility serving a fraction of that demand. These large libraries have also been the direct target of cyber-attacks and ransoms. Without ongoing investment in systems and internal connections, the cyber threat to all types of libraries will increase exponentially.

IV. E-Rate Is an Operating Necessity, Not Simply an Infrastructure Program

For all libraries and schools, connectivity is an ongoing service with recurring costs and continuously increasing capacity requirements. It is not a project that can be considered complete.

Public libraries are trusted community anchors essential to access, to broadband, devices, digital skill building, new technologies, and technical support. They also must protect patron privacy, staff systems, and public networks against increasingly sophisticated cybersecurity threats.

Adequate internet and internal connections ensure not just public access computers but often the HVAC system, the software to check out physical books, customer data and personnel records that keep the doors open, patron’s safe, and the lights on.

The need for continuing support is especially clear as libraries expand digital services. Libraries now provide online learning, virtual programming, telehealth access, digital government services, workforce platforms, business resources, media production, technology training, and

public access to increasingly data-intensive applications. These services require reliable internal networks, sufficient bandwidth, modern equipment, cybersecurity protections, and trained technical support.

The reliance on both libraries and access to connectivity has been growing as demonstrated by:

- Across the United States, library systems reported **418,415,077 total wireless sessions** in 2024 alone.
- The ULC 2025 Library Insights Survey documented that **171 million wireless sessions** were reported on library provided wireless networks in predominantly urban areas. Some systems provided as many as 20 million wireless sessions.

This connectivity is only made possible because of E-Rate. E-Rate should therefore be understood as a continuing investment in the operational capacity of public libraries and schools. The achievement of basic connectivity is the beginning of effective digital service, not the end.

V. Libraries Face Growing Cybersecurity Threats

Public libraries face the same rapidly evolving cybersecurity environment confronting other public institutions, including ransomware, phishing, credential theft, malware, denial-of-service attacks, data breaches, supply-chain vulnerabilities and attacks against networked devices. ULC has previously urged the Commission to modernize Category 2 support so libraries can maintain secure networks and protect patron information.

Libraries are particularly attractive targets because they operate open, heavily used public networks while also maintaining staff systems, administrative records, digital collections, payment systems, and other services that must remain available to the public.

Libraries must protect patron privacy and confidentiality while providing broad public access. They must secure public computers, wireless networks, servers, staff devices, authentication systems, online resources, and increasingly connected facilities. At the same time, library staff often must manage these risks with limited budgets, small information-technology teams, and equipment that may be difficult to replace or upgrade without outside support.

The experience of the Seattle Public Library demonstrates that cybersecurity incidents can disrupt core library operations and affect an entire community.

- The Seattle Public Library Memorial Day ransomware attack struck on May 25, 2024, knocking out online catalogs, public Wi-Fi, and computers across all 27 branches. The cost to address was over \$1 million dollars.

A major cyberattack can interrupt public computer access, wireless service, online catalogs, digital collections, staff communications, payment systems, program registration, and other essential services. Recovery may require emergency expenditures for forensic investigation, system restoration, replacement equipment, security improvements, staff support, and public

communication. The effects can continue long after the initial intrusion. Seattle's experience should not be viewed as an isolated problem limited to large urban systems. **It is a warning of what any library may face if its network infrastructure and security protections are not adequately modernized.**

Large systems may be more visible targets, but small, rural and Tribal libraries also operate public-facing networks, hold sensitive information, and serve communities that have less technology infrastructure, expertise, and support. A ransomware attack or other serious incident can therefore have an outsized effect on a small community, particularly where the library is the only public location offering reliable broadband, public computers, digital assistance, and access to online government, health, education, and employment services.

Without Category 2 modernization, outdated switches, firewalls, wireless access points, cabling, authentication systems, endpoint protections, and network-management tools can create vulnerabilities that attackers exploit. Libraries need support not only to connect to the Internet, but also to maintain secure internal networks capable of segmenting public and administrative traffic, monitoring threats, controlling access, protecting devices, and responding quickly to incidents.

Cybersecurity is not separate from connectivity and any reduction in E-Rate funding will increase the very real threat. A library cannot fulfill its public mission if its network is unavailable, compromised, or unsafe. Nor can a library responsibly expand access to AI tools, telehealth, digital government, workforce platforms, or online learning without protecting the systems through which those services are delivered.

The Commission should make clear that Category 2 modernization is a core component of E-Rate's mission. Supporting secure internal networks is necessary to preserve reliable public access, protect patron privacy, maintain continuity of operations, and ensure that libraries of every size can participate safely in the digital economy.

VI. The Age of Artificial Intelligence Makes Connectivity More Important, Not Less

Artificial intelligence is rapidly changing education, work, information access, and civic life. The question facing public libraries is no longer simply whether residents can connect to the Internet. It is whether everyone—regardless of income, geography or ZIP code—has safe and reliable access to the connectivity, tools, knowledge, and trusted guidance necessary to participate in an AI-enabled society.

At the Kansas City Public Library in Missouri, staff shared that importance of affordable broadband access like that made possible through E-Rate is only increasing in its community:

“As artificial intelligence technologies rapidly transform the economy, workforce, education, healthcare, and the broader information environment, reliable high-speed connectivity is becoming even more essential for meaningful participation in modern society. Public libraries remain one of the few universally accessible institutions where individuals can obtain both the connectivity and the support needed to engage with these

emerging technologies. E-Rate helps ensure that libraries can continue serving as trusted access points to opportunity, innovation, digital inclusion, and economic participation for all citizens.

Kansas City continues to experience significant digital inclusion challenges, and demand for technology assistance remains high. One example of how KCPL has responded to this need is through our AmeriCorps Library Corps program in which members provide digital skills training and technology troubleshooting support for patrons seeking help with everything from creating email accounts and submitting job applications to accessing healthcare portals and printing or scanning required documents. Over the last two years alone, Library Corps members facilitated more than 9,000 digital literacy interactions, helping patrons build confidence, knowledge, and greater participation in their communities.”

ULC’s 2025 Library Insights Report identifies AI literacy as an emerging need and recommends that libraries establish AI-literacy and digital-skills programming as core offerings, including instruction in AI tools. Continuing [research with the University at Albany’s Center for Technology in Government](#) similarly demonstrates that public libraries are becoming important hubs for learning about AI, using AI tools and engaging in decisions about how AI is deployed.

That work cannot occur without robust connectivity. Libraries need sufficient bandwidth and modern networks to provide access to AI-enabled educational tools, workforce platforms, research resources and digital-creation technologies. They also need secure systems and trained staff who can help residents understand the benefits, limitations, risks, and implications of AI.

The implications extend directly to economic opportunity. AI is reshaping the workforce and making reliable Internet connectivity increasingly important to students and workers preparing to participate in it. Students need access to the tools and platforms that will shape future education and employment. Job seekers need to understand how AI affects hiring, training and workplace expectations. Small businesses need access to emerging technologies that can improve productivity and competitiveness. Residents need trusted institutions that can help them distinguish reliable information from misinformation.

The Commission’s proceeding recognizes this connection by asking what level of connectivity schools and libraries will need to use AI-enabled educational tools effectively. That question confirms that E-Rate remains essential. **As the nation seeks leadership in AI and advanced technologies, the importance of access to the infrastructure that supports connectivity has increased** rather than diminished.

VII. The Commission Should Preserve a Universal E-Rate Program

ARSL and ULC jointly urge the Commission to preserve E-Rate as a permanent national program serving eligible libraries in urban, suburban, rural, and Tribal communities.

A universal program is necessary because library connectivity needs cannot be reduced to a single geographic or demographic category. Rural libraries may face high construction costs,

limited provider competition, and unavailable or unaffordable residential service. Urban libraries may face usage density, high demand for simultaneous connections, aging facilities, unaffordable residential service, and limited competition for enterprise-grade institutional service.

The Commission should also reject the premise that broadband availability demonstrates that connectivity needs have been solved. Any assessment of library needs should consider:

- affordability;
- institutional-level provider competition;
- bandwidth and capacity;
- reliability and service quality;
- internal network infrastructure;
- cybersecurity requirements;
- usage density;
- number of users and devices;
- digital programming and emerging technology needs; and
- the socioeconomic conditions of the communities served.

Finally, the Commission should modernize E-Rate for the next generation of library service. This modernization should include support for the bandwidth, internal networks, cybersecurity, and infrastructure required for AI literacy, workforce development, digital learning, telehealth, small-business assistance, and other emerging services.

VIII. Recommended Commission Actions

ARSL and ULC respectfully recommend that the Commission:

1. Preserve E-Rate as a permanent national program serving eligible libraries in urban, suburban, rural and Tribal communities.
2. Continue supporting recurring connectivity and operating costs, recognizing that broadband service requires ongoing investment, maintenance, upgrades, and technical support.
3. Modernize Category 2 and related support to address internal networks, cybersecurity, privacy, and the infrastructure necessary for emerging technologies, including secure wireless networks, firewalls, network segmentation, monitoring, authentication, endpoint protection, backup and recovery capabilities, vulnerability management and technical assistance.
4. Ensure that E-Rate supports libraries' growing role in AI literacy, workforce development, digital inclusion, education, health access, and small business assistance.

IX. Conclusion

For public libraries, connectivity is now as fundamental to service and our national economy as literacy and workforce skills building.

Public libraries are essential public infrastructure. Libraries advance literacy across a lifetime, strengthen economic opportunity, support workforce development, and small businesses, expand digital inclusion, provide career navigation, and connect residents to health and mental-health resources. Their ability to perform these functions depends on reliable, affordable, and secure broadband connectivity.

In an age of AI, escalating cyber threats and rapidly changing digital demands, withdrawing support would not preserve a completed achievement. It would place that achievement—and effective participation in the next generation of the digital economy—at risk.

ARSL and ULC respectfully urges the Commission to preserve E-Rate for all eligible libraries and continue adapting the program to the changing technological and cybersecurity needs of the communities Congress intended it to serve.

Respectfully submitted,

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