

**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)
)
Modernizing the E-rate) WC Docket No. 13-184
Program for Schools and Libraries)

COMMENTS OF THE DIGITAL PUBLIC LIBRARY OF AMERICA

E-rate has been incredibly successful in bringing Internet access to the nation’s schools and libraries. But with the Web now more than twenty years old, and a new generation of services and devices becoming critical to the present and future of education, whether in school or as part of the lifelong learning of our citizens at community libraries, it is now necessary to move beyond simple digital access. What is strongly needed is a national-scale project that helps local libraries provide new, forward-looking services easily, effectively, and inexpensively, which build upon the infrastructure that the E-rate program underwrites. We wholeheartedly agree with the statement of Commissioner Rosenworcel, that we should “do something audacious” with the “powerful combination of broadband, plummeting device costs, and increasing opportunity for cloud-based educational content” that combines and extends the noble goals of ConnectED and E-rate.¹

The American public expects libraries in particular to take on new roles in a digital age that relate directly to those goals, including but not limited to:

- 1) Serving digital content (such as e-books) in addition to physical content to their millions of patrons;
- 2) Digitizing, storing, and presenting content from their community, including local history, government documents, and educational materials;
- 3) Making such crucial materials available on new platforms beyond the fixed personal computer, such as mobile phones and tablets;

¹ FCC 13-100.

- 4) Providing digital access to information that improves the health, safety, education, civic life, and workforce success of our citizens;
- 5) Supporting e-government by meeting the needs of the many individuals who go to their libraries for information; for help in gaining online access to government agencies; and to conduct business with their government;
- 6) Modernizing their public and online spaces to support high-capacity wireless and mobile access, and to take full advantage of the capabilities of location-aware devices;
- 7) Providing learners with connections to content, wherever that content may be—locally available or on the network;
- 8) Offering cloud services that take advantage of higher bandwidth and more powerful computation.

In short, libraries are striving to address the larger meaning of “connectivity” in today’s world, and all of this must be done under significant resource constraints. This is a tall order.

We believe that the Digital Public Library of America (DPLA), a 501(c)(3) non-profit corporation, is perfectly situated to provide the above services at scale and efficiently, and to provide a framework for others who wish to assist libraries in their digital work. In doing so, we can bring to the nation “cutting-edge educational tools and learning platforms,” as Acting Chairwoman Clyburn has envisioned, while at the same time adhering to the E-rate modernization program’s effort to engage in cost-effective purchasing and bulk buying opportunities.²

The DPLA (<http://dp.la>) runs a fully modern, future-ready platform for e-learning and library services. Through a sophisticated cloud platform that natively supports customized digital access on any device, it brings together the riches of America’s libraries, archives, museums, and cultural heritage institutions and makes them freely available through contemporary interfaces such as an interactive map and timeline, which can be extended easily using our open technology. We believe that this platform could be repurposed for use on the local level, with any library taking advantage of DPLA’s ability to

² FCC 13-100.

serve digital content. *DPLA Local*, as we call this proposal, will allow public libraries to maintain their independence and to host and shape their own collections, while taking advantage of our advanced, open platform and a common cloud architecture. Without hiring programmers or running their own servers, libraries will gain access to all of today's and tomorrow's connected potential.

Importantly for a national effort, DPLA has achieved the recognition and support of America's libraries, with hundreds of libraries already partnering with, or contributing content to, DPLA. At the 2013 meeting of the American Library Association, DPLA was named a Best Website for Teaching and Learning by the American Association of School Librarians.³ We already serve over 4,500,000 digital works, from books to videos to photographs to scientific materials to government documents, from every state in the Union, and we continue to grow rapidly.

DPLA stands ready to provide our infrastructure and array of digital services to all public libraries in the United States, without each library independently trying to procure these at significant cost. We believe that at this national scale DPLA Local can bring services that would normally cost tens of thousands of dollars per year per library—that is, hundreds of millions of dollars a year for America's 17,000 public libraries—down to just \$1,000 per year per library. With this very small fraction of E-rate funding DPLA can have an outsized effect, bringing forward with far less effort and cost a common platform to enable libraries to achieve their educational mission and ensure the equality that E-rate was created to support.

We believe this cost-effective and ambitious program can be part of a much-needed extension and expansion of E-rate support to libraries so that they can build out the advanced networks and telecommunications services to serve their patrons in the twenty-first century. Such services are absolutely vital to our democracy, economy, and culture. An increase to the E-rate cap is essential to this proposal and will benefit the American public greatly, through higher bandwidth, more optimal use of

³ <http://www.ala.org/aasl/standards-guidelines/best-websites/2013>.

that bandwidth, and new, sophisticated uses for Internet connectivity that match today's technology and society.

The Digital Public Library of America looks forward to discussing this proposal with the Federal Communications Commission.

Respectfully Submitted,

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