Before the
Federal Communications Commission
Washington, DC 20054

In the Matter of:

Schools and Libraries Universal Support Mechanism
Federal-State Joint Board on Universal Service
Changes to the Board of Directors of the National Exchange Carrier Association, Inc.

CC Docket No. 02-6
CC Docket No. 96-45
CC Docket No. 97-21

Reply Comments of the American Library Association

The American Library Association (ALA), which represents the nation’s 123,000 libraries of all types, commends the Federal Communications Commission (FCC) for moving forward with a Tribal library Notice of Proposed Rulemaking (NPRM) to address the long-standing barriers to Tribal library participation in the E-rate program. We are pleased to see that of the six initial comments filed, including our own, all support tribal library E-rate eligibility and many suggest various program reforms to increase participation by small and rural libraries.

In alignment with all commentors, we reiterate in this response that the best way to support Tribal libraries and other small and rural libraries in accessing E-rate funding is to simplify the program rules. We propose simplifying the process by clarifying the Eligible Services List,
reducing forms, enabling flexibility for competitive bidding for small dollar amounts with an exemption of $10,000, and providing guidance and structure for navigating the process for applicants. In our initial comments, we detail these suggestions. Comments from other parties also support streamlining and simplifying the E-rate program rules as a critical way to increase participation, boost equity and inclusion, and create access for entities with limited capacity.

In conclusion, E-rate funding is imperative to close the digital divide and advance digital equity across the nation. Simplifying and streamlining the E-rate process would remove barriers to access for Tribal libraries and other small and rural libraries. Thus, the American Library Association strongly encourages the Commission to advance these new regulations.

Respectfully submitted,

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