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July 2, 2014

Tom Wheeler
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Chairman:

I have been asked about my view regarding using square footage of buildings to determine the amount of money a public library can receive from the FCC through the E-Rate program at the rate of \$1 per square foot.

I believe that using square footage is unfair to urban libraries, and to our customers who are disproportionately low-income, unemployed, or underemployed. Our libraries total approximately 220,000 square feet and the cost over the last three years of delivering access to digital information is approximately \$4 per square foot. In general, urban libraries are more crowded and serve many more customers in smaller spaces than our suburban or rural counterparts. Moreover, using square footage ignores most factors relevant to Wi-Fi performance.

We are investing at this level because Wi-Fi is essential for our urban customers. Increasingly, many users bring their own devices to our buildings for downloading our material, engaging in employment-related activities, researching medical concerns, participating in educational and training sessions, and doing their course work. In addition, many public libraries, including our own, are using and providing more and more wireless devices for use by our customers to meet the demands of an increasingly mobile technology landscape.

If the FCC allocates money to libraries on a per square footage basis it will send much more money to space-abundant, un-crowded suburban libraries and less money to smaller, crowded urban libraries whose customers often have no other practical way to obtain access to the Internet for seeking employment, education, or participation in society.

Wi-Fi costs are not merely a function of the square footage of a room with wireless connectivity. Wi-Fi performance is a function of users, interference from adjacent networks in other buildings, and architectural impediments. A room of a certain size with many users will have poorer Wi-Fi service than the same room with the same network that has fewer users. Resolving these capacity and technology problems requires a larger expenditure for expanding a Wi-Fi infrastructure.

Chairman Tom Wheeler

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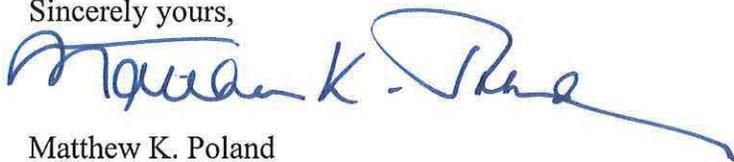
In order to address the variables, please consider giving libraries a choice between two formulas that best meets their needs:

1. Fund public libraries at the rate of no less than \$4 per square foot;
2. Fund public libraries at the rate of \$150 per average daily visitor (a formula proposed for schools).

Please give libraries the money we need to deliver what is typically the only free public Internet access available in our cities. Of course, we encourage the development of program rules to help or require libraries to have efficient procurement processes and clear program guidelines that will enable all libraries to participate in available E-rate program opportunities.

Thank you for your consideration. Your decision will impact the lives of tens of millions of Americans who depend on their public libraries everyday for access to the digital universe. That access changes lives.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Matthew K. Poland". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Matthew K. Poland
Chief Executive Officer