

ALA American Library Association

June 21, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Letter in Support of the State E-rate Coordinators' Alliance Petition for Reconsideration of Order DA 16-448, Petition for Waiver and Petition for Rulemaking, CC Docket No. 02-6

Dear Secretary Dortch:

The American Library Association submits this filing with the Commission in support of the petition submitted on May 12, 2016, by the State E-rate Coordinators' Alliance (SECA). The SECA Petition asks the Federal Communications Commission's (FCC) Wireline Competition Bureau to reconsider and grant relief to the more than 120 E-rate applicants—including nineteen libraries—that missed an invoice deadline and are unable to file reimbursement forms and receive their E-rate funding. A solution is also requested for other affected stakeholders that missed the invoice deadline.

We understand that the FCC tightened the invoice deadline procedures with the intent to improve program efficiency. Unfortunately the new regulation and procedures do not also balance the need to be flexible when applicants miss a ministerial deadline. For the other major forms required to be filed in the E-rate program, such as Forms 470, 471 and 486, the FCC has adopted a more flexible approach. Reminders of upcoming deadlines are sent to applicants and grace periods are provided when deadlines are missed. We request that the Commission consider adopting similar measures for the invoice deadline.

The new regulation and procedures have a very detrimental impact. Applicants may do everything right and if they miss the invoice deadline or do not ask for an extension by the original deadline, they will lose all of their funding. In the context of all the problems and issues our libraries and schools have experienced in this current 2016 application year, to now be denied funding for a past year issue is too extreme. It also does not align with the intent of the third goal of the E-rate modernization effort.

We hope that the FCC grants the SECA Petition and grants relief to our libraries and schools.

Respectfully submitted,

Emily Sheketoff

Emily Sheketoff
Executive Director
ALA Washington Office