Before the
Federal Communications Commission
Washington, DC 20054

In the Matter of:

E-Rate Program Amortization Requirement	)	**WC Docket No. 19-2**
(Modernizing the E-Rate Program for	)	**WC Docket No. 13-184**
Schools and Libraries)	)	

Comments of the American Library Association

The American Library Association (ALA) is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. For more than 140 years, ALA has been the trusted voice for academic, public, school, government and special libraries, advocating for the profession and the library's role in enhancing learning and ensuring access to information for all. ALA represents the nation's 120,000 libraries, which includes 17,566 public libraries. We appreciate this opportunity to comment on the E-rate's Amortization Requirement.

The American Library Association strongly endorses the Commission's proposal in this Notice of Proposed Rulemaking (NPRM) to eliminate the amortization requirement which applies to one-time, special construction Category 1 funding requests exceeding $500,000. While it is understandable why the Commission issued the Amortization Order in 2000, several circumstances have changed in the intervening years to make this rule unnecessary. First—and likely most importantly—with the 2014 Modernization Order's increase in E-rate funding to $3.9 billion, the concerns in 2000 about a "drain" on the then limited funding (just $2.25 billion) are no longer relevant. Second, the broadband infrastructure landscape for libraries (and schools) has changed dramatically since 2000. In the nearly two decades since the Amortization Order was adopted many libraries have used E-rate and other funding sources to replace their legacy copper connections with fiber-optic based connectivity. Certainly there is still a need for some libraries to upgrade their connectivity significantly but the total number is considerably less than in 2000. We think the lower number of applicants needing infrastructure upgrades is reflected in the Commission's own statistics as documented in paragraph nine of the NPRM.

Permanent removal of the Amortization Order is also another step toward program simplicity which was the third goal of the Modernization effort. The Commission acknowledges this in paragraph six of the NPRM in that the current suspension of the Amortization rule has "decreased the administrative burdens associated with applying for E-Rate support." And as the Commission correctly notes, removal of the rule has provided both applicants and providers with more funding certainty.

In conclusion, we do not believe the circumstances that led to the Commission's 2000 Amortization requirement still exist and permanently eliminating the rule will be beneficial to both applicants and service providers. Thus, we encourage the Commission to permanently eliminate the amortization requirement it suspended in 2014 and look forward to its decision on this important issue.

Respectfully submitted,

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