

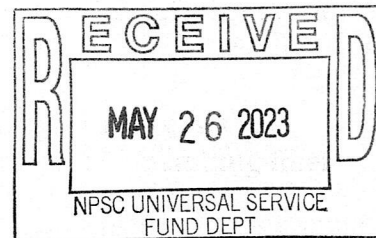
Nebraska Library Commission

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May 26, 2023

Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, NE 68508



RE: NUSF-117 P.O. 1

Commissioners:

On behalf of the Nebraska Library Commission, I am submitting comments regarding the Nebraska Universal Service Fund and the E-Rate Special Construction matching program in response to NUSF-117 P.O. 1. The Nebraska Library Commission (hereinafter "NLC") is the state library administrative agency and is charged by state statute with responsibility for statewide promotion, development, and coordination of library services.

1. What opportunities can the PSC pursue to increase participation and cover costs incurred by schools, libraries, and Consortiums ("participating entities") in installing fiber networks?

According to data collected by NLC, in 2020 60 libraries reported fiber optic connections. In FY2021, this number increased to 78, and in FY2022 increased further to 95. Inroads have been made but there is still work to do, as 95 is only 41% of all Nebraska public libraries reporting data. Initial fiber builds are challenging for some libraries. The current PSC special construction matching fund has helped some libraries move to fiber connections, but barriers exist with fiber adoption by many libraries, resulting in lower numbers of libraries not taking advantage of the benefits of the special construction program. Many Nebraska libraries are understaffed, lack the capability to assess the library's technological needs, and lack the time and expertise to file necessary forms. A number of these libraries face other challenges, such as the inability to pay costs not covered by E-rate and special construction funds, and the inability to pay monthly recurring service costs after E-rate discounts. Many libraries lack the technical support necessary to install and maintain secure networks.

NLC is now providing some additional technical assistance to libraries. An IT Infrastructure Analyst position has been added so that staff is available (at least in some capacity) to assist libraries with assessments of current equipment and planning for future upgrades. Increasing the special construction matching funds may accelerate libraries participating in the program, as well as provide additional assistance to libraries with filing the necessary forms. NLC believes it is beneficial for local libraries to develop working relationships with local tech support, and is exploring ways to encourage and aid those support systems.

2. What barriers do participating entities currently face in relation to participation in the E-rate program? Examples may be help with the E-rate forms/filing, filtering support, lack of or cost of tech support, knowledge or help with what are eligible reimbursements/costs (e.g. project planning).

The largest barrier facing most libraries is the necessary time involved with filing the forms, and a lack of understanding of the process. NLC currently has allocated one staff member as E-rate coordinator, but that person has *many* other duties (is also library development director).

3. Are there any partnerships or outreach opportunities which the PSC should pursue?

None that we are aware of.

4. Category One: The federally defined E-rate Category One includes costs for monthly charges, installation and activation charges, network equipment necessary to make a Category One wired or wireless broadband service functional, and maintenance and operation charges. Should the PSC consider expanding eligible expenses to include any of these categories?

As mentioned previously, monthly recurring costs, network equipment costs above what is covered by E-rate, and cost of security and filtering are all barriers for many libraries to install and maintain fiber networks.

5. What items or services are most needed by eligible entities in Nebraska? What additional eligible expenses might be reimbursable?

Our data indicates that about 41% of libraries currently have fiber connections, and a handful have indicated they are currently working on the switch to fiber. Assistance with the monthly recurring costs is an obstacle in some instances, and upgrades to currently used (and often outdated) network equipment, filtering software/hardware, security systems, and firewalls, are all needed.

6. Category Two: The federally defined Category Two of E-rate includes internal connections needed for broadband connectivity within schools and libraries. This includes repair, upkeep, and maintenance of networks, software upgrades, and third-party support. *The PSC seeks comment as to which, if any, of these services would most increase participation in the E-rate program.* Should any of these services be eligible for reimbursement in Nebraska as well? If so, what considerations or limitations should the PSC consider in allowing these expenses to be reimbursable? Conversely, are there any expenses that should be specifically excluded from E-rate reimbursement?

Yes. These are all needs of Nebraska libraries.

7. Nebraska's E-rate special construction program was originally planned to be available for a four-year period, for E-rate program years 2021 through 2024. The program is therefore set to end after E-rate program year 2024, which ends June 30, 2025. The PSC seeks comment on whether the program should be continued. Would it be appropriate to extend the project for another four years? Alternatively, should the program be set to automatically continue on an annual basis?

Yes. The biggest barriers thus far to participation are marketing to libraries, consulting with them regarding their needs, selling the benefits of fiber to them, and assistance with the process (e.g. forms and filing). Additionally, the response to COVID (library reduced hours, closures, etc.), and an increase in other programs and funding (ARPA) pushed many of the special construction projects to the back burners. Extending the program would offer those libraries additional time needed to apply for these benefits.

Sincerely,

Rod Wagner

Rod Wagner
Director