Matt Schmit
Director, Illinois Office of Broadband
Department of Commerce and Economic Opportunity

October 20, 2023

Dear Director Schmit and the Illinois Office of Broadband,

We are submitting this letter as public comment on your BEAD Initial Proposal (volumes one and two) on behalf of our respective organizations and the broader statewide Illinois library community. Our three organizations collectively serve Illinois's 1,760 public, academic, K-12 school, and specialized libraries. Illinois Heartland Library System (IHLS) and Reaching Across Illinois Library System (RAILS) are multitype regional library systems, which were established by the Illinois Library System Act (75 ILCS 10/) and are funded by annual system area and per capita grants from the Illinois State Library through the Secretary of State's office with funds appropriated by the Illinois General Assembly. The Consortium of Academic and Research Libraries in Illinois (CARLI) is supported by the University of Illinois System and serves 128 academic libraries throughout the state.

We commend your work to ensure that Illinois has robust plans for broadband deployment and digital equity efforts and your continued consideration of libraries as critical partners in these endeavors. We share your dedication to ensuring that Illinois libraries are well-represented and well-served by these efforts throughout the plan timeline and beyond. For this reason, we are committed to ongoing engagement with and promotion of your office's plans and programming. Illinois is a leader in support for broadband expansion and digital equity, as well as support for libraries and library cooperation, and we see a great deal of mutual benefit in joining forces around our shared priorities.

With our shared goals in mind, we hope you will consider our concerns regarding the following issues in the BEAD Initial Proposal before submitting it to NTIA:
1. clarification on how libraries are defined in Illinois;
2. library needs related to the deployment of broadband to their locations; and
3. prioritization of community anchor institutions.

Defining libraries

Please consider an alternate definition of "libraries" to the one used on page 13 of vol. 1 ("all public libraries, including those participating in the FCC E-Rate program as well as all member libraries, and their branches, of the American Library Association (ALA)"). Not all libraries participate in the E-rate program, and not all library agencies maintain membership with ALA, which is a national organization requiring a paid membership that is primarily at the individual level. Thus, the definition you provide is too narrow. It excludes many rural and small libraries vital to Illinois's broadband expansion and digital equity efforts.

In Illinois, the authoritative definition of a library is found in the Illinois Library System Act [75 ILCS 10] and in the Illinois Administrative Code [Ill. Admin. Code tit. 23, § 3030]. We suggest, "all libraries that are members of ILLINET." ILLINET, a network of cooperative library resource sharing accessible to Illinois residents, is composed of all multitype and public library system (IHLS, RAILS, or Chicago Public Library System) member library agencies.[i] Membership in library systems is defined by Administrative Code (23 Ill. Adm. Code 3030.200), does not require a fee, and is an eligibility requirement for grants from the Illinois Secretary of State/Illinois State Library. Library systems administer an annual certification process to verify ongoing eligibility for membership, which is then confirmed by the Illinois State Library. This annual certification must be completed

by all types of libraries. These processes, definitions, and requirements produce the authoritative roster of Illinois libraries.

Additionally, a focus on ILLINET members makes for more straightforward data collection. All certified ILLINET member libraries are listed in the Library Directory at https://librarylearning.org/directory. Data collected annually from these libraries via the required Illinois Public Library Annual Report and other surveys are available upon request from the library systems or Illinois State Library.

It is the case in Illinois that libraries of all types—public, academic, K-12, and special—cooperatively form a fabric of support and services to school children, adult learners, retirees, college students, and every other type of resident. Thanks to a statutory foundation built long ago, Illinois provides a network of resource sharing that is the envy of many other states.

Broadband needs in libraries

The Connect Illinois Five Year Action Plan recognizes the value of libraries in broadband expansion as key providers of digital inclusion services. But it does not account for their needs as agents of digital equity—a critical oversight that could compromise broadband adoption efforts.

Digital inclusion services require resources that many of our libraries lack. The Illinois Library Association provides detailed guidance to libraries in "ensuring adequate technological access and maintaining appropriate hardware/software that effectively accommodates both library operations and patron needs."[ii] However, public library funding levels vary widely, and many public libraries either don't have access to or can't afford adequate broadband. Many struggle to purchase and maintain updated technology equipment sufficient to meet their communities' needs. Some also experience digital skill gaps among their staff. E-rate is one way that some libraries can reduce costs, but that program does not fully resolve hardware and digital inclusion needs within library operations.

As broadband deployment to Community Anchor Institutions (CAIs) is planned, **we ask you to consider capacity assessment and support for capacity building as an essential element of this work** so libraries can truly benefit from this expansion and serve as expected to advance digital equity in Illinois. In addition to fiber deployment in unserved and underserved areas, **we see baseline library needs as including the following items**:
- 1Gb/s symmetrical access supplied by ICN;
- Updated network, Wi-Fi, and computer hardware[iii] to support increased speeds and use;
- Tech support for implementation and management; and
- Rigorous attention to affordability issues with enterprise-level service used by libraries but subject to pricing scaled to corporate customers.

More information regarding libraries' needs will be available soon. The Illinois Secretary of State is currently administering a survey (closing in November 2023) that is expected to illustrate public libraries' current internet service speeds and costs along with technology services and equipment availability and gaps. We look forward to sharing the data and analysis with the Illinois Office of Broadband when it's available.

Prioritization of community anchor institutions

As residential broadband access is expanded and digital inclusion programming becomes a priority in communities, libraries will be expected to support a growing number of residents using their devices and modern web services. Yet libraries, and by extension, the communities they serve, are at risk of not realizing the benefits of this historic funding if their existing capacity issues (bandwidth, equipment, staff) are not attended

to. We intend to offer support to libraries in securing and using grant funding to help address some of these issues. However, baseline connectivity is still subject to the BEAD process, and as you have observed in your draft Connect Illinois Five Year Action Plan:

- "CAIs are essential to residents' participation in the digital economy and society." (p. 117)
- "The Illinois Broadband Map currently shows the location of every library in Illinois. The gigabit symmetrical service map shows that many libraries lack access to this service." (p. 119)
- "CAIs like public libraries and municipal facilities are crucial to providing public Wi-Fi, networks, and access points in Illinois." (p. 172)

We are concerned about your interpretation of the CAI priority level as consecutive to (rather than concurrent with) residential deployment. This prioritization and the associated delay or absence of reimbursements for outlay to connect CAIs could have unintended consequences for libraries and their multifaceted role in the state's Digital Equity Plan. In addition to perpetuating a limited ability to provide digital inclusion services, it may hamper or even prevent efficiencies in broadband deployment planning where libraries or other municipal facilities could potentially comprise part of the infrastructure serving residents. **Therefore, we urge you to reconsider the consecutive prioritization of CAI funding eligibility, require subgrantees to engage with CAIs in communities impacted by deployment projects, and prioritize 1 Gb/s service to all public libraries in Illinois where practical as a component of residential deployment planning.**

We additionally encourage you to thoroughly review and consider incorporating the recommendations for state broadband leaders provided by the Schools, Health & Libraries Broadband (SHLB) Coalition, particularly recommendation #4 which illustrates our position on more nuanced CAI prioritization. We support these recommendations and believe that they will strengthen the state's plan and solidify its inclusion of CAIs.

Thank you for your consideration of these requests, your ongoing work to equitably provide Illinois residents with the connectivity required to fully participate in modern society, and the value you place on the role of libraries in this work. We look forward to collaborating with your office, and we encourage you to consider specific outreach to libraries for stakeholder engagement opportunities and further participation in the process. Please don't hesitate to reach out to our organizations directly for follow-up on this letter or any other matters where we may be of assistance.

Sincerely,

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        Governance Board, Consortium of Academic and Research Libraries in Illinois

Board of Directors, Illinois Heartland Library System

Board of Directors, Reaching Across Illinois Library System

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ILLINET Member Libraries		
	Agencies	**Buildings**
Public	640	814
School	145	235
Academic	798	3,791
Specialized	177	183
Total	**1,760**	**5,023**

ii Illinois Library Association. (2020). *Serving our public 4.0: Standards for illinois public libraries* (pp. 35–40).

iii Hardware requirements for incoming 1Gb/s internet speeds would be a router with a physical port that supports at least 1Gbps speed, preferably 10Gbps physical port speed with throughput of 2Gbps actual speed. Additionally, a firewall that can inspect and pass traffic at the speed provided by the ISP, or with very little delay. The throughput of the firewall should be at least 1Gbps. Finally, a network switch that supports at least two 10Gbps ethernet ports, and additional 100/1000Mbps ports to support Wi-Fi and additional library services.