

Massachusetts Libraries

BOARD OF LIBRARY COMMISSIONERS

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October 5, 2026

SUBMITTED ELECTRONICALLY VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Ensuring Children's Safe Use of Screens and E-Rate-Funded Services, WC Docket No. 26-133

Modernizing the E-Rate Program for Schools and Libraries, WC Docket No. 13-184

Establishing the Emergency Connectivity Fund to Close the Homework Gap, WC Docket No. 21-93

Promoting Fair and Open Competitive Bidding in the E-Rate Program, WC Docket No. 21-455

Dear Ms. Dortch:

The Massachusetts Board of Library Commissioners (MBLC) has the statutory authority and responsibility to organize, develop, coordinate, certify, and support libraries across the Commonwealth of Massachusetts. We write to address the Federal Communications Commission's (FCC) Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking regarding the E-Rate program, including whether the FCC should eliminate E-Rate altogether or cut out urban areas from E-Rate eligibility. We urge the FCC to reject any proposal that would terminate or limit the E-Rate Program.

E-Rate is critical for schools and libraries to maintain affordable, reliable access to the Internet. Terminating that support represents a cut to school and library budgets, jeopardizing years of

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progress building and upgrading those networks. Cutting E-Rate also threatens to leave vulnerable communities behind that don't have dedicated resources to fill the gap.

More than 126 libraries, serving more than 2,600,000 residents, across the Commonwealth of Massachusetts applied for and received \$1,560,570.31 in E-Rate funding last year alone. Each week, more than 46,000 patrons use free internet services in public libraries, which does not include the thousands more who use free library Wi-Fi on their personal devices. The E-Rate program is critical to building and maintaining the infrastructure patrons and librarians rely on to expand access to not only digital resources but also the foundational systems that keep libraries open, safe, and comfortable. Security systems, heating and cooling technology, cataloging, workforce development programming, and more, rely increasingly on high-speed broadband internet connections to and within our libraries.

As the entity responsible for certifying and administering federal and state funding for public, academic, and special libraries, we can attest that last year the networks and libraries that participated in E-Rate received \$1,900,963.37 in upgrades and services at a discounted cost to them of only \$340,392.97. State and local budgets cannot absorb the deficit if E-Rate is reduced or eliminated.

Through the MBLC, all libraries have access to research databases that provide every Massachusetts resident with trustworthy online content covering topics such as science, health, history, biographies and more. Last year, there were over 9 million full text downloads from research databases, an increase of 12% in just one year. Overall, sixty percent of database usage comes from schools, where databases are integrated into curriculum. Eliminating or reducing E-Rate would negatively impact students' ability to conduct online research from reliable sources and would constrict resources available to teachers.

A resident served by the SAILS regional network, which encompasses the Southeast part of the Commonwealth, shared with the MBLC that the potential elimination of the E-Rate program is "terrifying," noting that the library catalogs provide access to the resources she needs to support the special needs children in her program. As both a researcher and advocate, she uses the online

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catalog daily, and if it was restricted or eliminated, the knowledge she relies on would be out of reach for her and the students that rely on her.

E-Rate funding has been fundamental in ensuring schools and libraries have affordable access to reliable and sustainable service. Continued support of the program is essential if we want to build on these advancements and meet the evolving educational needs of those we serve.

The Massachusetts Board of Library Commissioners respectfully urges the Federal Communications Commission to consider the millions of patrons served by the E-Rate program here in the Commonwealth and reject any policy change that reduces the investment or number of libraries served by the E-Rate program.

Sincerely,



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Chair, MBLC



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Vice Chair, MBLC



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