

Delete, Delete, Delete



The American Library Association's Five Recommendations for the FCC's Streamlining Proceeding

The American Library Association (ALA) follows a two-prong approach to increase library participation in the E-Rate program with an emphasis on reducing the gap between urban and rural libraries:

First, ALA advocates for robust, targeted outreach and education programs through the FCC and USAC to ensure libraries have the resources necessary for success.

Second, ALA consistently pursues ways to reduce program complexity for applicants and identify opportunities to leverage the program to accommodate evolving technology applications and use. Much of this work is done by communicating directly with the FCC on ways to streamline the program, thus making it easier for all libraries to apply.

In March 2025 the FCC opened the “**Delete, Delete, Delete**” proceeding seeking comment on how to alleviate the regulatory burden of its rules, regulations, and guidance. The goals of the proceeding are well aligned with ALA’s simplification goals for the E-Rate program, and thus, ALA submitted comments reviewing the program’s procedures and forms. The comments are based on a common sense approach refined by years of research and by the experiences of library stakeholder groups. The following recommendations are straightforward rule changes to eliminate unnecessary steps that have plagued applicants for years.

ALA's Five Recommendations

1. Replace FCC competitive bidding requirements with standing state and local rules. Libraries typically purchase goods and services of far more value than the amount they receive from the E-Rate program. These purchases are made following long established state and local procurement procedures. Libraries, as public institutions, are subject to regular audits following procedures defined by the Governmental Accounting Standards Board (GASB). With procurement procedures already in-place and with audits conducted on a regular basis, there is no need to require an additional layer of federal bidding requirements. To act now, the Commission could pilot the concept and exempt those purchases under \$10,000 from the current competitive bidding requirements.

2. Eliminate the form 486. Applicants use this form to certify that they comply with the Children’s Internet Protection Act and to indicate the start of service. These certifications can be added to the form 471 thus reducing the number of forms applicants and PIA reviewers must track.



3. Establish a 5-year standard for National School Lunch Program (NSLP) data. The requirement to collect NSLP data annually to determine a library’s E-Rate discount contributes to countless hours applicants spend confirming

About the ALA and America's Libraries

The 123,000 libraries across the United States are a powerful force in addressing public policy priorities. Libraries advance Education, Employment, Entrepreneurship, Empowerment, and Engagement for Everyone, Everywhere—The E’s of Libraries®. 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 145 years, the 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 American Library Association

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the data. Since these data seldom change very much from year to year, collecting this information once every 5 years eliminates wasted hours and reduces repetitive PIA review questions.

4. Allow a rolling application window for category 2 (C2) purchases. The five year funding allocation for C2 enables built-in flexibility to accommodate mid-year equipment needs and reduces unnecessary PIA review.

5. Allow service substitutions mid-year. Current rules prevent applicants from increasing bandwidth or other needed service changes even from the same provider and

even if the change does not increase the approved funding amount. This is overly restrictive and can negatively impact library services.

ALA stands firm

Since the inception of the E-Rate program in 1998, ALA has been the primary voice for libraries at the FCC.

ALA consistently calls to simplify the program and strike a balance between program integrity and applicant burden. ALA also monitors congressional and regulatory actions that could harm the sustainability of program.



E-Rate in Libraries

The E-Rate program is a critical source of broadband funding that about half of the nation's public library locations depend on each year. Many factors contribute to whether a library decides to apply for E-Rate funding. A perennial barrier is that it is an overly complex program with a structure that has struggled to find balance between regulatory oversight and applicant accountability. The challenge to comply with program requirements disproportionately affects small, often rural, libraries that have fewer staff and less access to IT support or in-house technical expertise, than their suburban and urban counterparts. While the FCC has taken steps to simplify the program, more can, and should, be done.



Who applies to the E-Rate program?

- About half of the nation's 17,000 public libraries apply for E-Rate funding (individually or part of a consortium)
- **Note the gap: 61% are urban libraries and 21% are town/rural libraries**

The complexity hurdle. Of the libraries that do not apply:

- 45% say the program is too complicated or time-consuming
- 41% report that the discount is not worth the time to apply

The stakes

- 28% of libraries do not meet the FCC's definition of broadband (100/20 Mbps)
- **Note the gap: 5% of urban libraries fall below this threshold, compared to 35% of town/rural libraries**

FURTHER RESOURCES



Scan this code to read the American Library Association's full comments to the FCC regarding the "Delete, Delete, Delete" proceeding.



For additional information on ALA's position on USF and E-Rate, please visit ALA's Resource Page on E-Rate: tinyurl.com/ALA-e-rate