





- (b) Device make/model and serial number;
- (c) The patron to whom the device was checked-out; and
- (d) The date the device was checked-out and checked-in.

The ILS circulation module can contain all the above information, but the issue is how to retain the information for the ten years as required in the ECF regulations. Here is one scenario to meet the ECF ten-year information retention regulations.

- The above information (a-d) will be entered and maintained as part of the ILS circulation module.
- To enable devices to be checked out, each will have a cataloging (i.e., item) record and barcode, just like other items (e.g., books) that are checked out. In addition, some field(s) in the cataloging item record will store the device type and its make/model and serial number (lines a and b above). These data can then be used to determine the circulation records of ECF-purchased devices and indicate that these records should be extracted for the daily report.
- The ILS will be set to run a report daily extracting the above information (lines a through d) for items purchased with ECF funds that were checked out and checked back in. Upon check in, patron information (i.e., line c above) will no longer be associated with the circulation module.
- These daily reports will be stored with previous daily ECF reports for a period of ten years. (If the library is open 300 days annually, there will be a total of 3,000 daily reports.)
- Any request by the FCC, USAC or auditors for these reports will be honored only after patron personally identifiable information (PII) has been removed. If the FCC, USAC or their auditors request patron PII, these parties will need to follow the process outlined in
- In the event that PII is requested following the state law, the library will not be required to match the patron record to the circulation record. This will be the responsibility of the auditor, USAC, or the FCC using the information in the daily ECF funded device circulation reports.

Some ILSs will be capable of running the type of report outlined above. In other instances, it may be necessary for the ILS vendor to modify its report options to include the above type of report. Another option is that some library staff may have the expertise to develop the ECF-device required data retention report.

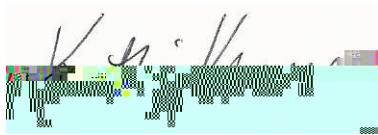
The above scenario represents one way in which libraries may approach compliance with the patron data and document retention rules. However, by offering this example, we do not intend that this is the only way libraries can provide ECF-funded devices to patrons and remain in compliance.

Finally, to allow for adequate time for libraries to implement a system that adheres to state and local privacy laws and policies in order to comply with the ECF program rules, we respectfully request the Commission allow for a reasonable delay in enforcing the data retention requirements (e.g., 90 days after the application window closes). This modest delay will help ensure libraries are well prepared to develop a reasonable system for documenting the required information.

Libraries are committed to keeping their communities connected, and the ECF program provides a significant opportunity to immediately add to their capacity. As the application window opens, we are eager to continue to work with the Commission and USAC to ensure libraries are ready.

Thank you for your consideration of these core library concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathi Kromer', is written over a light blue background. The signature is somewhat stylized and is positioned above a horizontal line of small, colorful squares.

Kathi Kromer

Associate Executive Director,  
Public Policy and Advocacy, American Library Association

cc:

FCC Interim Chairwoman Jessica Rosenworcel

FCC Commissioner Brendan Carr

FCC Commissioner Geoffrey Starks

FCC Commissioner Nathan Simington

Sue McNeil, Associate Bureau Chief, Wireline Competition Bureau

Marijke Visser, Senior Policy Advocate, American Library Association