

SUPERIORLAND LIBRARY COOPERATIVE

E-Rate Consortium Policies, Presented to SLC Board on 09/22/2022

Authorization for E-Rate

The Board of Directors of the Superiorland Library Cooperative designates its DIRECTOR as Purchasing Agent for the Superiorland Library Cooperative and the Superiorland Library Cooperative E-rate Consortium. The Board designates its ERATE COORDINATOR as its Authorized Representative for the federal E-Rate program; and, as its Designated Custodian for E-Rate. The ERATE COORDINATOR is also designated as the responsible authority for administering and managing interactions between the Superiorland Library Cooperative and the Superiorland Library Cooperative E-rate Consortium and the E-rate program administrators, including (but not limited to) filing for E-rate discounts, seeking reimbursements on services, and management of any necessary software tools.

E-Rate Consortium Record Retention Policy

All E-Rate Consortium records shall be retained for **the period required by the FCC** in accordance with FCC **current rules**.

E-Rate Consortium Gift Policy

The Superiorland Library Cooperative board, employees, and any E-Rate consultants shall follow the gift rules outlined in the FCC's 6th Report and Order.

This restriction on acceptance of any gift or other thing of value from a service provider participating in the E-Rate program is always in effect. The restriction is not triggered only during the period when a competitive bid is in process.

E-Rate Consortium Procurement Policy

In selecting service providers for all eligible services and/or goods for which E-Rate support will be requested, the Superiorland Library Cooperative Purchasing Agent shall request competitive bids for all such eligible services and/or goods and comply with the following local procurement process:

Net Neutrality Policy

In December 2017, the United States Federal Communications Commission dismantled the previously existing net neutrality rules governing broadband internet service providers. Although the regulations requiring net neutrality have only been in effect since 2015, net neutrality was the position of the federal government for over a decade. The 2015 rules required internet service providers to treat all websites equally. Internet service providers could not use their power over the internet infrastructure to serve their own interests or restrict access to certain information by blocking content or altering the speed at which specific information could be uploaded or downloaded. The net neutrality rules prevented internet service providers from creating choke points for the flow of information between internet users.

The Internet has become integral to the lives of most individuals and, for some, serves as the primary method of obtaining and sharing information. The end of net neutrality gives internet service providers tremendous influence over what individuals learn, how individuals communicate with each other, and what decisions individuals make. Allowing corporations unfettered discretion to restrict information is antithetical to the free exchange of ideas, which has always been the bedrock of American ideals and the goals of the library, which seeks to spread access to knowledge and information, rather than restrict them.

Therefore, the library finds that the Internet should be equal and open to all to ensure that a few corporations do not become the sole arbiters of the information individuals are able to access. Accordingly, the library has determined that the following policies should be applied to all future broadband Internet access and connectivity contracts, as applicable.

Vendors providing broadband internet access service or other connectivity services to the library shall not:

- 1) Block lawful content, applications, services, or nonharmful devices, subject to reasonable network management;
- 2) Impair or degrade lawful internet traffic on the basis of internet content, application, or service, or use of a nonharmful device, subject to reasonable network management;
- 3) Engage in paid prioritization; or
- 4) Unreasonably interfere with or unreasonably disadvantage:
 - a. End users' ability to select, access, and use broadband internet access service or the lawful internet content, applications, services, or devices of their choice; or
 - b. Edge providers' ability to make lawful content, applications, services, or devices available to end users

E-RATE CONSORTIUM BIDS FOR GOODS OR SERVICES

The Director will determine which purchase of materials, supplies, equipment and services will be by contract and which will be by purchase agreement. All contracts and agreements valued over \$5,000 will be submitted to the Board for approval, unless they were 'pre-approved' in the budget or purchased with grant funds. Approval will be a majority of the voting board. Approval may be obtained by telephone poll or email, with formal Board approval at the next regular or special Board meeting. The Director and a Board member will sign contracts valued over \$5,000.

Value under \$2000

The Director or designee is authorized to make purchases for all individual items where the cost per item is under \$2000.

Value \$2000 to under \$5,000

The Director is authorized to make purchases after obtaining pricing from a minimum of two sources, when available.

Value \$5,000 to under \$15,000

The Director will obtain pricing from a minimum of two sources, when available, and submit the pricing with a recommendation to the Superiorland Library Cooperative Board.

Value \$15,000 or more

The Director will solicit competitive bids and submit the bids with a recommendation to the Superiorland Library Cooperative Board.

The Purchasing Agent shall wait at least four weeks after the posting date of the competitive bid before making commitments with selected service providers.

The Purchasing Agent shall consider all complete bids that meet required specifications and select the most cost-effective service offered, with price being the primary factor considered.

The Purchasing Agent shall keep control of the competitive bidding process by not surrendering control to a service provider who is participating in the bidding process.

Children's Internet Protection Act (CIPA) Compliance

The Board of Directors of the Superiorland Library Cooperative reaffirms its CIPA and Internet Safety Policy adopted at its public meeting on April 19, 2002.

The E-Rate Record Retention policy shall apply to invoices proving purchase of Internet filtering software.