



Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of)	
)	
Adding Wi-Fi on School Buses to the FY 2024)	
Eligible Services List for the E-Rate Program)	WC Docket No. 13-184
)	
Schools and Libraries Universal Service Support)	
Mechanism)	
)	
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COMMENTS OF THE STATE E-RATE COORDINATORS' ALLIANCE
IN RESPONSE TO PUBLIC NOTICE DA 23-1011

November 30, 2023

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I. INTRODUCTION

The State E-rate Coordinators' Alliance ("SECA") submits these Comments to address the numerous questions raised in Public Notice DA 23-1011 and other important implementation considerations for adding Wi-Fi equipment and services on school buses to the FY 2024 E-rate Eligible Services List ("ESL"). The Public Notice was issued in conjunction with the Federal Communications Commission's ("FCC" or "Commission") Declaratory Ruling, which found that the use of Wi-Fi or similar access point technologies on school buses is an educational purpose. Prior to the FCC's issuance of the Declaratory Ruling, SECA and SHLB (the Schools, Health & Libraries Broadband Coalition) submitted ex parte filings to identify various operational and administrative considerations for this new service, and we include our recommendations on these important matters below.

In issuing its Declaratory Ruling on October 25, 2023, nearly five months into the FY 2024 application cycle, and directing that school bus Wi-Fi be included in the FY 2024 Eligible Services List ("ESL"), the Commission has undertaken an extraordinary effort that requires prompt action by the Wireline Competition Bureau ("WCB" or "Bureau") and by the Universal Service Administrative Company ("USAC" or "Administrator") to fulfill this directive.

Not only is prompt action necessary to identify exactly what non-recurring equipment and related costs as well as recurring service costs will qualify for E-rate funding, applicants also need to know precisely what other special conditions and requirements, if any, will govern the procurement and use of the equipment and services, including, but not limited to, competitive bidding, eligible use restrictions, applicability of CIPA, and document retention. SECA encourages the Bureau to include the implementation guidance in the Order issued in response to the current Public Notice so that Applicants are fully informed of their obligations and responsibilities governing the purchase and installation of this equipment and service on buses. In other words, applicants need to understand the ground rules up front so they can make informed decisions whether they want to apply for school bus Wi-Fi funding.

Equally as important, the operational requirements governing the application process need to be published simultaneously with the release of the ESL supplemental Order. Below, SECA sets forth its recommendations on these operational matters and encourages the Bureau to address these in the Order.

II. SUMMARY OF COMMENTS

SECA makes the following recommendations in these Comments:

- Non-recurring eligible costs should include the router, antenna, cabling, license, installation and upfront maintenance/support costs. Recurring eligible costs should include the service to access wireless internet service via a commercially available wireless or satellite vendor using the Wi-Fi equipment.
- All Wi-Fi equipment and service costs should be identified as Category One.
- SECA's analysis shows that the average bus Wi-Fi non-recurring cost is likely to be about \$3,000 per bus and the annual recurring cost will be around \$420. Our anecdotal information suggests that of the approximately 500,000 school buses nationwide, no more than 25% or 125,000 are likely to apply for E-rate in the upcoming year. Using an average E-rate discount percentage of 71% obtained from the USAC Open Data, we forecast that the school bus Wi-Fi demand for funding, when added to the demand for all other funding, will not exceed the annual funding cap for FY 2024.
- In light of the forthcoming Notice of Proposed Rulemaking to add off-campus hotspot service to the Eligible Services List, SECA suggests that the FCC establish rules of priority for funding of on-campus services and equipment first, if total demand in a year exceeds available funding. The funding of the off-campus equipment and service should follow the existing rules of priority for funding of Category Two requests.
- SECA recommends that both the equipment and service associated with bus Wi-Fi should qualify for the existing competitive bidding exemption (i.e., \$3,600) for commercially available broadband internet access service ("CABIO") per bus. At a minimum, the recurring service costs of Wi-Fi service should qualify for the CABIO exemption since there are limited wireless vendors in the market and their prices do not vary significantly.
- There should be no additional restrictions on the use of school bus Wi-Fi service than the limitations applied to E-rate funded on-campus internet access service.
- All school buses, whether owned or leased by the school, should qualify for E-rate funding for Wi-Fi. The billed entity will retain ultimate responsibility for compliance with all E-rate program rules and regulations.
- We encourage the Commission to allow the district to determine vehicle eligibility within certain broad parameters. In addition to buses, there may be other vehicles that regularly transport students to and from school and school related events.
- There should be no minimum usage requirement once service is activated.
- The existing forms can be used to apply for school bus Wi-Fi and do not require modifications that could delay the ability of applicants to apply for this funding, and potentially delay the beginning of the FCC Form 471 filing window for all funding requests. SECA has attached screenshots with suggestions on how to apply for the service and equipment on FCC Form 471, and encourages the FCC to provide guidance to applicants in the ESL Order.
- SECA also recommends that the school bus Wi-Fi funding requests must be applied for on a separate FCC Form 471 application that lists "Bus Wi-Fi" in the application nickname and in each funding request nickname.

- USAC should designate a special PIA team devoted to reviewing these FRNs since the novelty of the service may require different review procedures and specific expertise. Segregating these funding requests as separate applications will enable applicants' other funding requests to be processed in the normal course of business and will, hopefully, avoid delays that may occur with the review of the novel bus Wi-Fi service and equipment funding requests.
- School buses should not be assigned separate entity numbers in order to simplify the application process and avoid an administrative logjam that would be inevitable if each applicant had to contact the Customer Service Center and request the assignment of an entity number for each vehicle.
- The timing of the release of the supplemental ESL order is extremely important in determining whether applicants will have sufficient time to meet the FY 2024 Form 471 filing window deadline, SECA anticipates, based on prior years' experience, that if the ESL Order is released by December 15, 2023, applicants should have sufficient time to meet the typical FCC Form 471 application deadline in late March, 2024 (which is pending an announcement). If the ESL Order is issued later than December 15 – during the winter break when many school officials are on vacation -- SECA recommends that there be a modest extension of time provided *only for* the bus Wi-Fi FCC Form 471 applications and not extend the Form 471 window dates for all other funding requests.

III. SPECIFIC QUESTIONS POSED IN PUBLIC NOTICE DA 23-1011

A. What equipment and services are needed for school bus Wi-Fi?

Wi-Fi routers, antennas and associated cables should be eligible equipment because some or all of these components are necessary to implement Wi-Fi service. The installation and maintenance/support of the routers also should be eligible as part of the equipment purchase. All of these costs should be considered as Category One non-recurring costs. Recurring wireless internet access service costs and any associated vendor recurring licenses also should be eligible. Manufacturer basic maintenance — technical support, bug fixes and security patches — should be treated as non-recurring costs and be reimbursable upon payment. Service-based support agreements for eligible equipment should be governed by the existing BMIC rules where reimbursement is limited to actual use of the service for other eligible equipment.

Portable routers/antennas should also be eligible for funding, subject to the applicant needing and using the equipment regularly during the funding year. Equipment should not be supported by E-rate if warehoused or kept in inventory as spare equipment.

B. Should the Wi-Fi equipment and services be considered Category One and/or Category Two?

Wi-Fi equipment and services for school buses should be considered Category One, similar to the classification of wireless internet equipment and service costs for library bookmobiles. The alternative, treating Wi-Fi services as Category One and the router and antenna equipment as Category Two, would unduly complicate the application process by requiring separate FCC Form 471s for each category of service and imposing all of the downstream distinct variations for different categories of service. Most importantly, classifying this equipment as Category 2 without any increase in the current budget multiplier would impose an added strain on schools' existing, fixed, Category 2 budgets.

C. Are there additional requirements needed to ensure the use of school bus Wi-Fi equipment and service is consistent with E-rate program rules and limitations?

The Public Notice specifically asked whether use of the bus Wi-Fi service should be restricted to students and staff, thereby prohibiting any use of the service by others for non-educational purposes. This restriction would be narrower than the provisions governing on-campus usage of E-rate supported services and equipment by the community and other ineligible users while school is in session and also during other times.

SECA believes that the primary purpose of school bus Wi-Fi is to meet the educational needs of students traveling to and from school or school activities. It should be recognized, however, that such usage may often involve other individuals related to the school activities — not just school staff — such as third-party bus drivers, parent chaperones, volunteer coaches or assistants, security, or medical personnel. Any individuals traveling with or transporting groups of students should be deemed eligible users and their access to Wi-Fi service should be included in the definition of “educational purpose.”

While ineligible usage of school bus Wi-Fi service is not likely to be substantial, we do anticipate that there may be equipment or uses of the Wi-Fi service that may not fit squarely within the definition of eligible purpose. For example, there may be other equipment connected to the Wi-Fi service such as onboard cameras or bus tracking devices that may be considered ineligible. This use should be considered ancillary and not require any measurement or cost allocation. Alternatively, ineligible use that falls outside the educational purpose definition – whether it be attributed to ineligible purposes or ineligible users -- should be subject to the 90% eligible safe harbor rule adopted in the Tribal Library E-rate Order.¹ If ineligible usage exceeds 10% then the associated costs must be deducted from the pre-discount amount of the associated funding requests.

The adoption of different and more stringent ineligibility rules and procedures for bus Wi-Fi is unnecessary and will cause confusion among applicants, service providers and the administrator. Further, such added restrictions may require the creation of a new FCC Form 471 to revise the “primarily for educational purposes” certifications prescribed in 47 C.F.R. §§ 54.503(c)(2)(v) and 54.504(a)(1)(vii) and change the certifications to “solely for educational purposes” which will further delay the implementation of the eligibility of this service for FY 2024. SECA therefore recommends that new or special restrictions not be imposed on school bus Wi-Fi service.

D. What will be the impact of discounted school bus Wi-Fi funding on E-rate funding?

The fiscal impact of funding Wi-Fi on buses through E-rate obviously depends upon the assumptions made with regard to applicant demand, initial installation and ongoing services costs, average discount rates, and the final eligibility rules enacted by the Commission.

¹ *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6 *et seq.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 23-56 (released July 21, 2023), para. 26.

Public Notice DA 23-1011, as well as the text of the Declaratory Ruling, cite an estimated cost of providing Wi-Fi on school buses as averaging \$1,840.00 per year. We believe this estimate is too low. SECA considered two different data sets in making this determination:

- 1) A third party analysis of ECF Open Data, performed by E-rate Profit Works, found that the average one-time cost per bus was \$2,360.28 and the average annual recurring cost was \$421.24, which is \$2,782.00 in total. They estimated that if equipment was purchased for 450,000 buses and service was purchased for approximately 506,520 buses, the total prediscount cost would be \$422 million. Applying the nationwide average discount of 71%, the E-rate demand would be approximately \$299 million.
- 2) SECA members also conducted independent research by contacting several ECF recipients of bus Wi-Fi funding, and asked for a detailed breakdown of their costs. Our analysis produced the following costs:

Description	Non-Recurring Cost	Annual Recurring Cost
Router (Cradlepoint IBR 1700)	\$1,588.00	
Antenna	\$383.00	
Installation	\$1,150.00	
Maintenance/Support	\$207.00	
Subtotal – Non-Recurring Cost	\$3,328.00	
Wireless Internet Service (T-Mobile and Verizon)		\$353.00 - \$420.00
Total – Low Range	\$3,328.00 + \$353.00 =	\$3,681.00
Total – High Range	\$3,328.00 + \$420.00 =	\$3,748.00

Notably, these costs are closer to the average costs computed by E-rate Profit Works from the ECF Open Data.

Based on these two analyses, we believe that the demand estimate should be based on the average cost per bus of \$3,420.00, comprised of non-recurring costs of \$3,000.00 and \$420.00 for the annual recurring costs. These amounts reflect an average of the cost data reported by E-rate Profit Works and the data that SECA members independently researched. We also believe that the likely percentage of school buses for which E-rate Wi-Fi funding will be requested will be 25% or less, based on anecdotal information as well as surveys conducted by South Dakota and Ohio.

Common estimates of the number of school buses in the United States range from 480,000 to 500,000. Were 25% of these buses (125,000) be equipped with E-rate funded Wi-Fi systems at an average cost of \$3,420.00 in FY 2024, and applying the average E-rate discount rate of 71%,² the FY 2024 E-rate demand would be \$303,525,000 which, when added to historic demand for other services, would be well within the existing

² USAC’s E-rate Search Commitments Tool in Open Data reports an average discount of 71% since FY 2021.

annual cap. This demand will likely decrease in future years as the majority of school bus Wi-Fi costs will be for recurring services only.

E. Rules of priority should be established in the event that demand for off-campus services causes overall demand to exceed the annual E-rate funding cap.

While SECA is not immediately concerned that the addition of bus Wi-Fi service and equipment to the E-rate program will cause overall demand to exceed the annual E-rate funding cap, SECA, however, is aware of the pending NPRM to add off campus hot spot service to E-rate. Not knowing what those costs are or what the demand will be for that service (should the Commission order so decide), SECA urges the FCC to consider what actions will be necessary should the annual total demand exceed the cap. SECA recommends that funding for all other current on-campus services and equipment in Categories One and Two be prioritized before funding of off-campus services for bus Wi-Fi and hotspots. Should it become necessary to scale back funding requests, the reduction of any off-campus funded requests should be pro-rated according to the Category Two rules of priority. In no circumstances should the demand for off-campus internet access cause a reduction in approved funding for on-campus broadband services and equipment. SECA agrees that expanding the eligible services list to include limited off-campus connectivity is an enhancement to the E-rate program, but care must be taken to ensure that such additions do not inadvertently negatively impact the foundation of the program - to support broadband connectivity to and within school and library buildings.

F. What changes need to be made in the Eligible Services List's Eligibility Explanations?

SECA agrees with the Commission's proposal in Public Notice DA 23-1011 to explicitly cover mobile broadband connectivity for school buses by modifying the ESL's Category One's list of data transmission and internet service by including the word "mobile" under the "Wireless" service.

If, as SECA recommends, school bus Wi-Fi is to be considered a Category One service, then one sentence in section "C. Eligibility Explanations for Certain Category One and Category Two Services" must be changed, clarified, or eliminated. The problematic sentence, in the subsection "Wireless services and wireless Internet access," currently reads: "Off-campus use **even if used for an educational purpose** is generally ineligible for support, and must be cost allocated out of any funding request" (emphasis added).

SECA suggests that this sentence be eliminated in its entirety. An alternative — crafting language to define what types of off-campus educational purposes are or are not eligible — will be overly complicated for

ESL purposes. Such language would become further complicated if and when the hotspot NPRM is adopted. Should *any* off-campus internet services for educational purposes be deemed ineligible in the future, SECA recommends that the Commission release a separate clarifying notice.

IV. OTHER IMPORTANT IMPLEMENTATION ISSUES TO ADDRESS IN THE ESL ORDER

In addition to the issues raised in Public Notice DA 23-1011, questions related to E-rate funding of school bus Wi-Fi have been raised by SECA and others in the months leading up to the Public Notice. We encourage the Commission to address these issues and to incorporate SECA's recommendations into the final FY 2024 ESL supplement for school bus Wi-Fi.

A. The existing competitive bidding exemption for commercially available high-speed internet access should be applied to school bus Wi-Fi.

Applicants whose total costs for bus Wi-Fi equipment and service, including installation, basic maintenance, taxes and fees, will be at or below a pre-discount amount of \$3,600.00 per bus should be permitted to use the commercially available broadband internet access service competitive bidding exemption, at 47 C.F.R. §54.504(e) (commonly referred to as "CABIO"). Applicants whose costs are expected to exceed this amount would still be able to apply for E-rate, but would have to comply with the E-rate competitive bidding rules and justify higher costs during PIA review.

The language of the CABIO regulation is technologically neutral and does not differentiate between fixed wireline internet service and wireless internet service. In view of the Commission's principle of technology neutrality, the wireless Wi-Fi internet service and equipment for buses should qualify for the exemption. Further, the Commission previously found that the CABIO exemption includes both recurring service and non-recurring service such as the equipment needed for internet access.³

The FCC already found that Wi-Fi service and equipment is commercially available in both the Emergency Connectivity Fund proceeding, and in the E-Rate Notice of Proposed Rulemaking in which off-campus use of hotspots is proposed to be eligible for E-Rate funding when used for educational purposes.⁴ In the recent NPRM, the Commission stated:

³ In the *First 2014 E-rate Order*, the Commission stated, "An Internet access service will be eligible for this exemption only if it offers bandwidth speeds of at least 100 Mbps downstream and 10 Mbps upstream for a pre-discount price of \$3,600 or less annually, *including* any one-time installation *and equipment charges*, and the service and price are commercially available. (emphasis added), para. 199.

⁴ *Establishing the Emergency Connectivity Fund to Close the Homework Gap*; WC Docket No. 21-93, Report and Order, 36 FCC Rcd 8696, 8708, 8712-13, paras. 29, 35 (2021) (*Emergency Connectivity Fund Report and Order*); *Addressing the Homework Gap through the E-rate Program*, WC Docket 21-31, Notice of Proposed Rulemaking (*Off-Campus Wireless Connectivity NPRM*) (FCC Order 23-91)(Order released November 8, 2023).

With respect to wireless Internet access services, we propose to limit the use of services to those that can be supported by and delivered with Wi-Fi hotspots provided to an individual user (as opposed to multi-user hotspots). Pursuant to this proposal, schools and libraries would be able to seek E-Rate support for *commercially available Internet access services* (e.g., a data plan) that will be used on any individual user Wi-Fi hotspot, including E-Rate- or ECF-funded hotspots, previously purchased hotspots, and/or student-, staff member-, or patron-owned hotspots. (emphasis added).⁵

Indeed, the Commission's experience to date with the competitive bidding exemption for Internet access has been so positive that the exemption was recently expanded to apply to libraries' purchases of Category Two items at or below the same threshold. Further, the limited exemption balances the need to ensure cost-effective purchases and the goal of streamlining the E-rate program, particularly for smaller applicants.⁶

It also appears that costs for school bus Wi-Fi equipment and services requested in the ECF program were generally cost-effective, despite the lack of competitive bidding requirements.⁷ The same can be expected in the E-rate program, especially because of the additional built-in cost control measure that requires applicants to pay for a portion of the costs from their own budget, compared to the 100% reimbursement of costs in the ECF program.

There are several public policy considerations in favor of allowing the use of the CABIO exemption for these costs, particularly for recurring service costs to connect to a commercial cellular or satellite vendor's network. First, many rural applicants have limited competitive options for cellular Wi-Fi service that will work for them. Because geographic variations can impact the service coverage, schools often need the services of specific carriers for specific bus routes. Schools reported that they learned through the ECF process that services that work along one school bus route may not necessarily work along another school bus route.

Second, schools that have already installed Wi-Fi on their buses, whether through ECF or other funding sources, have already selected the wireless internet service providers that work for their specific bus routes. They should not be forced to undergo a bidding process after having already determined which carrier's network works on which bus routes, not to mention that such services may already be under contract.⁸

⁵ *Off-campus Wireless Internet Connectivity NPRM*, para. 21.

⁶ *Id.*

⁷ Although competitive bidding was not required due to the emergency nature of the program, SECA believes that we have presented other equally valid reasons for allowing applicants to use the existing commercially available high-speed internet access bidding exemption.

⁸ SECA does not believe that the CABIO bidding exemption should just apply for existing multi-year contracts.

Requiring applicants to conduct a bidding process increases administrative costs without any added cost control benefit such as reducing the price of the most cost-effective option.

Finally, as outlined in these comments, the cost of cellular service only varies by a few dollars each month and therefore any such variations will have a negligible impact on the E-rate program at most.

The bidding exemption has the added benefit of allowing applicants to swiftly procure the equipment and service needed for their buses and to request funding in FY 2024. This is especially important in light of the shortened time frame to do so given the timing of the anticipated order. Funding requests can be submitted earlier in the application window thus greatly reducing the need for additional filing days for these applications.

We believe that utilizing the existing bidding exemption for commercially available internet access, the requirement to pay the non-discounted share, and ECF experience, along with complying with any applicable state, local or Tribal procurement requirements, will enable applicants to cost-effectively procure the equipment and service, and enable them to begin benefiting from this new initiative in FY 2024.

B. The FCC should defer to schools to identify eligible school buses and school transportation vehicles.

While “school bus” is a generic term, there are many nuances across state laws, and even at the local level, as to which vehicles are classified as buses and other school vehicles that are used to transport students to and from school and to school related events. The standard federal definition of school bus and activity bus includes any motor vehicle that has capacity of 11 persons (including the driver) and is likely to be used significantly to transport preprimary, primary and secondary students to and from school and school related events.⁹ This definition, however, does not encompass additional school transportation vehicles that transport fewer students, but fulfill the same function as a school bus. These vehicles should also qualify for Wi-Fi equipment and service if the school decides it is in their best interest to equip these vehicles with Wi-Fi service. Many smaller vehicles transport students with special medical needs or are experiencing homelessness or are in

⁹ 49 C.F.R. § 571.3 (c) National Highway Transportation Safety Administration’s definitions: “School bus means a bus that is sold, or introduced in interstate commerce, for purposes that include carrying students to and from school or related events, but does not include a bus designed and sold for operation as a common carrier in urban transportation.” “Multifunction school activity bus (MFSAB) means a school bus whose purposes do not include transporting students to and from home or school bus stops.”

foster care.¹⁰ The National Congress on School Transportation uses the definition of “**school vehicle**” that we believe should be adopted for this purpose:

Any vehicle owned, leased, contracted to or operated by a school or school district and regularly used to transport students to and from school or school-related activities. Includes school buses, activity buses, vans and passenger cars, but does not include transit or charter buses.¹¹

Given that schools are responsible for paying the non-discounted share of the Wi-Fi costs, they can be relied on to make prudent decisions concerning which student-transportation vehicles in which the Wi-Fi equipment and service should be installed. Because many special populations of students are transported with smaller vehicles than school buses, this broader definition is essential to ensure that all students can benefit from this initiative.

Persistent driver shortages and scarcity of the inventory of new school buses due to COVID supply chain limitations are other factors underlying schools' increasing reliance on these kinds of school vehicles for transporting students. Accordingly, these vehicles should also qualify for E-rate funding of Wi-Fi equipment and service.

Further, consistent with the proposed definition of eligible school vehicle, there should be no distinction between buses that are owned by schools or where school transportation is a contracted service. Many schools have outsourced busing to private companies for a multitude of reasons, including but not limited to staffing flexibility, cost effectiveness, and lack of internal bus maintenance expertise. These students need to be able to access Wi-Fi service just as much as those students traveling on a school-owned bus.¹² As the billed entity, the school will purchase and own the equipment and will be billed for the monthly wireless internet service costs, whether the equipment is installed on a bus that the district owns or leases. The school is also responsible for E-

¹⁰ See, e.g., <https://www.schoolbusfleet.com/10111958/school-bus-alternatives-meet-a-range-of-standards-student-needs> which states, “In 2017, the U.S. Department of Education amended part of the ESSA to require that all local education agencies that receive funding under Title I, Part A of the act coordinate transportation with state or local child welfare agencies for students in foster care. The amendment also included changes to the McKinney-Vento Homeless Assistance Act, which allows homeless students free transportation to their school of origin, even if they live in a different school district.

¹¹ 2015 (16th NCST) National School Transportation Specifications and Procedures; Appendix A, Definitions; <https://nasdpts.org/resources/Documents/NCSTFiles/NCST%202015%20Specifications%20and%20Procedures%204.20.18.pdf>.

¹² For example, in Pennsylvania, approximately 80% of school bus fleets are outsourced to third party companies. In South Dakota, the largest district in the state, the Sioux Falls School District, leases its 150 buses from a private company. Of the 70 districts (nearly one-half of total number) that responded to a survey, approximately 31% of their buses are leased from a third party.

rate compliance and will have to undertake appropriate measures to ensure that the vehicle owner is familiar with and will abide by the E-rate program requirements.

C. School buses should not be required to be assigned entity numbers.

SECA believes that treating individual buses as separate entities would be a logistical nightmare for USAC and for the schools. We recommend that no separate entity numbers be required, and instead the FRN should list the recipients of service as all the schools that are part of the school or school district billed entity.

In order to obtain entity numbers, and have their entity numbers connected with the billed entity in EPC, it is necessary for each applicant to contact the Customer Service Center and provide the specific information necessary to create the entity numbers. To be absolutely clear, applicants ***cannot*** do this on their own without the involvement and action of the Customer Service Center.

Multiplying a bus entity update process for tens of thousands of school buses each year will cause a tremendous administrative quagmire. Whether the applicant requests the entity numbers before or after the close of the administrative window, these requests could flood the Customer Service Center. If this scenario is not already sufficiently dismal, consider too that the EPC profile fields for entities require a substantial amount of information that is not relevant to school buses and will undoubtedly cause more confusion among applicants and the customer service representatives trying to process these requests. In short, SECA strongly encourages the FCC to make clear in the Order finalizing the bus Wi-Fi ESL that entity numbers are not required for school buses.

D. Once the bus Wi-Fi equipment and service is installed and activated during the funding year, there should not be a minimum usage requirement.

Once Wi-Fi equipment is installed on a bus (or portable units are purchased) and service is initiated, a school's costs are largely fixed. Unlike the ECF program, for which expenses were reimbursed at the 100% level, E-rate applicants have an additional incentive to limit both their own and the E-rate program's costs because of the non-discounted cost requirement that they must pay. Schools must make a significant investment from their local budgets to implement bus Wi-Fi: they must pay not only their non-discounted cost of the Wi-Fi equipment and services, but also the full costs of related services and software that do not qualify for E rate, such as tracking and monitoring systems that coordinate and monitor bus routes, as well as the allocation of personnel resources to oversee the initiative and ensure E-rate compliance.

For the school bus Wi-Fi program, this is important because schools cannot predict with any degree of certainty how often specific buses, much less the Wi-Fi services on those buses, will be used. At any given time, a certain percentage of buses may be out of service. Bus and Wi-Fi usage may drop dramatically in the summer months and during vacation weeks. Schools should not be required to continually monitor bus Wi-Fi usage and adjust wireless usage costs accordingly.

For these reasons, the Commission should be confident that schools will seek funding when they anticipate students will benefit from it. But because schools cannot predict the future, and there may be numerous reasons why there may not be usage recorded of an activated Wi-Fi service, there should be no minimum usage requirement as a prerequisite to obtaining payment of the associated E-rate discount funding.

E. Documentation and asset inventory records should be based on the Wi-Fi router and not the ancillary equipment such as antennas or cabling.

SECA recommends that bus Wi-Fi equipment purchased by schools be tracked and inventoried for long-term record retention purposes by the primary router units (portable or installed), not by associated equipment such as antennas, SIM cards, etc. This will permit E-rate applicants to keep track of the basic units of mobile operability as buses are replaced or redeployed without requiring detailed inventories of associated accessories. Leased equipment, not owned by the schools, can be tracked via contract records that are maintained during the required retention period. Service records should be similarly retained.

F. The application process for school bus Wi-Fi should be incorporated into the existing forms and be subject to the same schedule as all other funding requests.

SECA has attached screenshots with suggestions on how to apply for the service and equipment on both the FCC Form 471, and encourages the FCC to provide guidance to applicants in the ESL Order. Our recommendations work within the existing form, thereby avoiding the need for and potential delay of changing the online filing system. SECA also recommends that the school bus Wi-Fi funding requests must be applied for on a separate FCC Form 471 application that lists “Bus Wi-Fi” in the application nickname and in each funding request nickname. We also recommend that USAC appoint a special PIA team devoted to reviewing these FRNs since the novelty of the service may require different review procedures. Segregating these funding requests in separate applications will enable applicants’ other funding requests to be processed in the normal course of

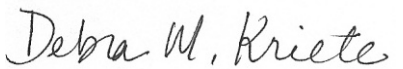
business and will hopefully avoid delays that may occur with the review of the novel bus Wi-Fi service and equipment funding request.

Last, the timing of the release of the supplemental ESL order is extremely important in determining whether applicants will have sufficient time to meet the FY 2024 Form 471 filing window deadline, which is typically scheduled for the last week in March. SECA anticipates based on prior years' experience that if the ESL Order is released by December 15, 2023, applicants should have sufficient time to meet the usual FCC Form 471 application deadline. If, however, the ESL Order is issued later than December 15 – during the winter break when many school officials are on vacation -- SECA recommends that there be a modest extension of time provided only for the bus Wi-Fi FCC Form 471 applications and not delay the Form 471 window dates for all other funding requests.

V. CONCLUSION

SECA respectfully requests the FCC to amend the E-Rate FY 2024 Eligible Services List to add bus Wi-Fi and to adopt an Order consistent with the recommendations in our Comments.

Respectfully Submitted by:



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Form 471 Filing Instructions for School Bus W-Fi and Related Equipment

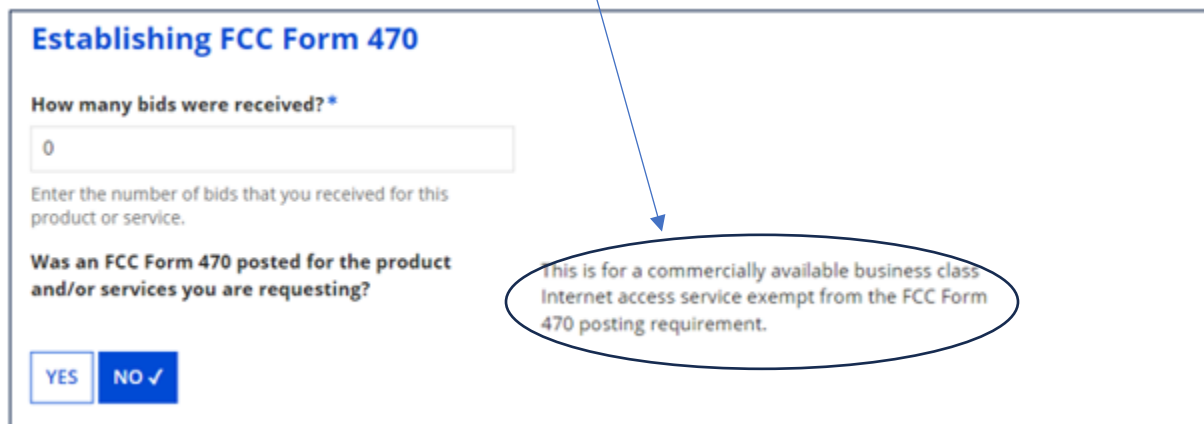
A) Basic Filing Requirements:

1. Separate Form 471 for all School Bus Wi-Fi-related requests
2. Separate FRN for each contract record or vendor
3. Form 471 Nickname must say "School Bus Wi-Fi"
4. List 'All Schools' as Recipients of Service (no separate bus BEN)
5. FRN narrative should clearly explain the number of buses included in the request

B) Form 471, FRN Establishing Form 470, Assuming Bidding Exemption:

Use these selections for MTM service, and modify helper text to say:

"This is for commercially available business class Internet access service and related equipment that is exempt from the FCC Form 470 posting requirement."



Establishing FCC Form 470

How many bids were received? *

Enter the number of bids that you received for this product or service.

Was an FCC Form 470 posted for the product and/or services you are requesting?

YES NO ✓

This is for a commercially available business class Internet access service exempt from the FCC Form 470 posting requirement.

This can be used on the Form 471 (when using CABIO), or on the Contract Record.

For a contract service or equipment, a contract record must be created.

C. FRN Line Items Selections for these "Buckets":

- 1) Internet Access Service
- 2) Internet Service Taxes/Fees
- 3) Equipment
- 4) Installation, Activation & Initial Configuration
- 5) Basic Maintenance and Technical Support

Each 'Bucket' is shown below with FRN Line Item screenshots. Note: Wherever possible, we tried to use existing drop-down options, but did recommend two areas where a modification may be helpful.

1) Internet Access Service:

Product and Service Details for FRN Line Item #2299001610.003

[Show Help for Taxes and USF Fees](#)

Purpose ?*

- Internet access service that includes a connection from any applicant site directly to the Internet Service Provider
- Data Connection between two or more sites entirely within the applicant's network
- Data connection(s) for an applicant's hub site to an Internet Service Provider or state/regional network where Internet access service is billed separately
- Internet access service with no circuit (data circuit to ISP state/regional network is billed separately)

Function ?*

Wireless

Please select a value

Fiber

Copper

Wireless

Other

Miscellaneous

Type of Connection *

Wireless data service

Please select a value

Microwave

Satellite Service

Data plan for portable device

Wireless data service

Optional: Could add School Bus Wi-Fi Service as New Drop-Down Option, but not needed.

2) Internet Service Taxes/Fees:

Function  *

Miscellaneous 

Please select a value

Fiber


Copper

Wireless

Other

Miscellaneous

Type of Connection *

Taxes and USF Fees 

Please select a value

Maintenance and Technical Support

Installation, Activation and Initial Configuration

Taxes and USF Fees

3) Equipment:

Function ?*

Other ▼

Please select a value

Fiber

Copper

Wireless

Other

Miscellaneous

Type of Connection *

Other ▼

Please select a value

Broadband Over Power Lines

Radio Loop


Other


Enter Type of Connection, if Other was selected *

Router - Cradle Point IBR 1700

Optional Modification: Add 'School Bus Wi-Fi Equipment' as new option under Type of Connection. Would then require a new text box that says: "Enter Equipment Type, Make and Model"

4) Equipment, Installation & Activation:

Function  *

Miscellaneous 

Please select a value

Fiber


Copper

Wireless

Other

Miscellaneous

Type of Connection *

Installation, Activation and Initial Configuration 


Please select a value


Maintenance and Technical Support

Installation, Activation and Initial Configuration

Taxes and USF Fees

5) Basic Maintenance and Technical Support:

Function  *

Miscellaneous 

Please select a value

Fiber


Copper

Wireless

Other

Miscellaneous

Type of Connection *

Maintenance and Technical Support 

Please select a value

Maintenance and Technical Support

Installation, Activation and Initial Configuration

Taxes and USF Fees