



September 2, 2022

SUBMITTED ELECTRONICALLY VIA ECFS

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

Re: Ex Parte Filing

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

Dear Madam Secretary:

Pursuant to Federal Communications Commission's ex parte rules, I hereby submit the following summary of our August 30, 2022, conversation with Gregory Watson, Policy Advisor to FCC Commissioner Brendan Carr, to discuss the proposed declaratory ruling announced by Chairwoman Rosenworcel on May 11, 2022 making Wi-Fi on school buses eligible for E-rate funding.¹

The following individuals participated in the call along with the undersigned: John Windhausen, Jr., Executive Director, SHLB Coalition; Rachelle Chong, SHLB Chair and Law Office of Rachelle Chong; and Michael Flood, SVP & GM, Public Sector, Kajeet, Inc.

The participants on the call made the following points:

- SHLB supports the proposal to make Wi-Fi on school buses eligible for E-Rate support. SHLB urges the Commission to move to issue the draft Declaratory Ruling so that comments may be gathered. School Bus Wi-Fi services could provide critical Internet access to school children who don't have adequate access at home, and to those who have a long commute to and from school. E-rate already supports library bookmobiles which extends the ability to borrow a book into areas lacking libraries; like bookmobiles, school bus Wi-Fi services extends classroom learning onto the bus ride home. Many school districts have issued tablets to their students, and Internet access is necessary by students to perform Internet-enabled work in order to keep up with their peers. In the evening, the

¹ See Press Release, Federal Communications Commission, Chairwoman Rosenworcel Circulates Ruling Making Wi-Fi on School Buses Eligible for E-Rate Funding (May 11, 2022), <https://www.fcc.gov/document/chair-rosenworcel-proposes-using-e-rate-fund-school-bus-wi-fi>.

school bus may be placed out in the community to provide Wi-Fi access for students to complete more lengthy projects, like term papers or Internet-aided research.

- As an example,² California suffers greatly from connectivity problems in the rural Central Valley area (as well as in far northern and southeastern parts of the state). Wi-Fi availability on school buses would help students tremendously, as they are riding the bus for long periods at a time. In Coachella Valley, which is one of the poorest areas in the country, the Coachella Valley Unified School District began an initiative that provided tablet devices to students, which was funded through a technology bond. All the students are eligible for school lunch, and 60% lack Internet at home. To help provide Internet connectivity to students at home, the School District outfitted two of its school buses with Wi-Fi, to be used as mobile hotspots. The buses are parked overnight at community sites like trailer parks, and allow students to connect in order to complete homework assignments. The School District plans to outfit 90 additional buses.
- Kajeet, Inc. (a managed IoT connectivity services provider) has deployed Wi-Fi on school buses for about six years. There are three major configurations that Kajeet customers use:
 - Install a high capacity router into the school bus that is able to withstand its specific environment (such as high temperatures, dust, vibration), antennas on top of the bus to receive the cell signals from various providers, and antennas within the bus to propagate the Wi-Fi signal. Service costs averaging approximately \$30/month for 4G LTE broadband via any major carrier network.
 - Install a multi-carrier router with multiple modems that can aggregate and/or switch between carriers whether parked or while in transit.
 - Outfit the school bus for 5G broadband that can be used on any major 5G carrier network.

Kajeet also provides business options for districts, including professional installation and managed services.

- Kajeet, Inc. and its customers are concerned about protecting students and keeping them in a safe environment. Its Sentinel platform provides security and filtering for inappropriate content or security/privacy risks that the school district wants to block. It can also filter anything additional that is (more broadly) non-educational (e.g. consumer games or entertainment) if the district wishes. The most opportune window for installation usually occurs during the summer months, which Kajeet would like the Commission to take into consideration regarding the E-Rate cycle.

² This example was contributed by Rachelle Chong (SHLB Chair and Law Office of Rachelle Chong).

- We believe that about 10% of school buses have been connected through the ECF Program. The ECF program is a temporary program, however. Many school districts would welcome having school bus Wi-Fi be E-Rate eligible for long-term solutions.
- We also note that student behavior on school buses improves due to Wi-Fi availability. We also heard from a Kansas school IT director that having Wi-Fi on the bus helped the school recruit and retain bus drivers.
- SHLB hasn't taken an official position on whether Wi-Fi eligibility would fall under a Category 1 or Category 2 expense. We understand that the Commission would first issue the Declaratory Ruling and then administer a rulemaking proceeding to answer this question.

Sincerely,



Kristen Corra
Policy Counsel
Schools, Health & Libraries Broadband (SHLB) Coalition
1250 Connecticut Ave. NW Suite 700
Washington, DC 20036
kcorra@shlb.org
571-306-3757

cc: Gregory Watson
John Windhausen, Jr.
Rachelle Chong
Michael Flood