



September 6, 2022

SUBMITTED ELECTRONICALLY VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Ex Parte Filing
Modernizing the E-rate Program for Schools and Libraries,
WC Docket No. 13-184

Dear Madam Secretary:

Pursuant to the Federal Communications Commission's ex parte rules, I hereby submit the following summary of our September 1, 2022, conversation with Marco Peraza, Legal Advisor to FCC Commissioner Nathan Simington, to discuss the proposed declaratory ruling circulated 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; Rachele Chong, SHLB Chair and Law Office of Rachele Chong; and Michael Flood, SVP & GM, Public Sector, Kajeet, Inc.

The participants on the call made the following points:

- SHLB's membership is comprised of a diverse mix of libraries, schools, and other anchor institutions, as well as for-profit and non-profit companies. Our mission as a public interest organization seeks to promote the advancement of technology and make it equitable to help solve the digital divide.
- SHLB supports the proposal to make Wi-Fi on school buses eligible for E-Rate support. SHLB urges the Commission to approve the draft Declaratory Ruling so that comments may be gathered on its implementation. School Bus Wi-Fi services could provide critical

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>.

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.

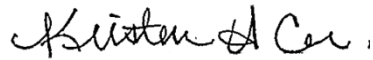
- SHLB hasn't taken an official position on whether Wi-Fi expenses would fall under Category 1 or Category 2. We understand that the Commission would first issue the Declaratory Ruling and then administer a rulemaking proceeding to answer this question and other questions. SHLB encourages the Commission to adopt the Declaratory Ruling as soon as possible so that the questions concerning implementation can be resolved in time for the 2023 E-rate application funding year. Schools tend to install Wi-Fi equipment over the summer months, so it would be helpful for the Commission to resolve these issues quickly to allow for schools to apply for this funding in early 2023.
- As an example,² California suffers greatly from connectivity problems in the rural Central Valley area (as well as in far northern, southeastern and Central Coast parts of the state). Wi-Fi availability on school buses would help students without Internet access at home 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 Internet-enabled homework assignments. The School District plans to outfit 90 additional buses.
- The Coachella Valley example is analogous to a library bookmobile. 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 extend classroom learning onto the school bus during rides to and from school.
- The average retail cost of Internet in the Central Valley area of California ranges from \$40 - \$65 dollars, depending on the broadband provider, so affordability can be a barrier for low-income families. Residents would likely be able to receive a discount if they are registered for ACP or the California Lifeline Program. However, many of these residents are English language learners, so signing them up to these programs and proving eligibility is often a challenge.
- Kajeet, Inc. works with anchor institutions to provide connectivity for residents and school students. A significant portion of students ride the school bus (just under 50%). The average school bus ride is just under 45 minutes, which results in students spending a

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

significant amount of time daily on the bus. We also see both rural and urban uses for Wi-Fi on school buses. Lengthy bus rides can occur in urban areas, especially in areas where school choice programs exist. The length of school bus rides has been increasing due to the current school bus driver shortage.

- Kajeet, Inc.'s networks are also CIPA compliant. 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.
- Kajeet, Inc. notes that many school districts are sensitive to deploying Wi-Fi connectivity to the buses or fleets with the highest need. First, deployment can start with the activity buses (those that transport football, band, debate teams, etc.) that transport students long distances. Second, deployment can focus on long routes, which Kajeet determines to be anything over 30 minutes each way. For buses with commutes under 30 minutes, the material benefit of having Wi-Fi comes when schools park them in lots to extend Wi-Fi beyond only the ride time. It may be easier for a district to install the technology in all buses, however, because the same physical bus might not run the same route every day.
- We believe that about 10% of school buses are now equipped with Wi-Fi connectivity through the FCC's ECF Program. The ECF program is a temporary program, however. We understand that many of the school districts that deployed Wi-Fi under the ECF Program are looking for sustainable solutions after the program ends. Many school districts would need school bus Wi-Fi to become E-Rate eligible for long-term sustainability.
- We note that student behavior on school buses improves due to Wi-Fi availability. Districts have noted a decrease in inappropriate student behavior on a Wi-Fi enabled bus, which can lead to less liability on the district, an increase in homework completion, and an increase in school bus driver satisfaction and retention.
- Kajeet, Inc. has also seen (through collected data) that once Wi-Fi is installed on the bus, students actively use it – even those that have Internet access at home (they may rather work on homework on the bus rather than at home, for example). Homework completion impacts all students in the classroom; the entire class cannot move forward until the teacher first addresses the students that didn't complete their homework.
- The articles linked below were not discussed but shared during the meeting:
 - <https://www.kajeet.net/resource/beekmantown-wifi-on-school-buses/>
 - <https://www.kajeet.net/resource/raytown-improve-bus-behavior/>
 - <https://www.kajeet.net/resource/kajeet-and-google-power-rolling-study-halls/>
 - <https://www.kajeet.net/resource/how-to-decrease-student-behavior-incidents/>

Sincerely,



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