

School Bus Wi-Fi E-rate Eligibility

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In November, 2023, the FCC released a [Declaratory Ruling](#) to make school-bus Wi-Fi service and related equipment eligible for Category 1 E-rate discounts beginning in FY 2024.

Below is a summary of the eligible services, rules and Form 470 instructions.

Equipment and Service Eligibility

- All school bus Wi-Fi equipment, mobile service and installation will qualify as Category 1.
- Eligible equipment includes modems, routers, antennas as well as the installation of the equipment.
- Maintenance and operation services are not eligible, although the FCC “may revise these eligibility determinations in a future funding year upon further review of the costs associated with these services and equipment.”
- Schools may enter into service contracts with multiple service providers, but only applicants with a rural designation can request E-rate funding for multiple services providers for the same bus.

Eligible Vehicles

- Only school buses used primarily for transporting students to and from school and school-related activities are eligible. Other school vehicles, such as vans or cars, are not eligible. Likewise, other buses such as occasionally-chartered buses (think field trips), city or municipal buses are not eligible.
- School buses may be leased by, contracted for, or owned by the school.
 - If leasing buses or contracting for busing services, schools are reminded that the school will own the E-Rate-funded equipment and are expected to work with their leased or contracted school bus providers to maintain an accurate asset inventory of the E-Rate-funded equipment.

Use Restrictions and Requirements

- When buses are not being used for educational purposes, the Wi-Fi must be disabled. This includes renting buses for private and for-profit events, as well as after-hours community usage (parking buses for community Wi-Fi).
- Content filtering and user network restrictions are required consistent with the school’s Acceptable Use Policy for internet usage inside school buildings.
- There is no monthly minimum usage requirement as long as the equipment is installed and the service is activated. This includes summer months when buses are not being used.

- Warehoused or spare equipment are not eligible for reimbursement, nor is service that has not been activated.
- Bus Wi-Fi equipment purchased with E-rate funds may not be resold, etc. for at least five years, consistent with E-rate rules.
- All document retention requirements apply, consistent with the 10-year requirement.

E-rate Bidding Requirements

- Competitive bidding is required for all equipment and services, and a bid evaluation must be conducted to select the most cost-effective option(s).
- The FCC surprisingly declined to make an exemption for pre-existing multi-year contracts; however, your current service contract may be used as a bid response that may be part of your evaluation process.
- The FCC also declined to allow the CABIO bidding exemption to be used for school bus Wi-Fi recurring services.

Filing the FCC Form 470:

- Separate Form 470 Category 1 requests for the Wi-Fi equipment and the Wi-Fi service must be made if seeking vendor proposals for both equipment and service.
- Starting in FY 2025, EPC no longer requires schools to upload an RFP document to EPC when starting a bus Wi-Fi Form 470. However, if you would like to do so, a draft RFP, vendor response template, and bid evaluation templates are available at: <https://e-ratepa.org/?p=35259>
- Although not a requirement, I encourage schools to issue a separate Form 470 for bus Wi-Fi service and use the nickname: “School Bus Wi-Fi Service” or “School Bus Wi-Fi Service and Equipment”.
- Suggested Form 470 narrative language: “Seeking bids for wireless school bus service and (if applicable) associated equipment to make the service functional to provide Wi-Fi. See RFP for additional information.”
- Beginning in FY 2025, use these Form 470 Drop Down Selections:

For Wi-Fi Service:

Add New Service Request	
<input type="radio"/>	I seek bids for internet access and/or data transmission service.
<input checked="" type="radio"/>	I seek bids for mobile service for use on school buses.
Service Type Data Transmission and/or Internet Access	
Function * Mobile Service For Use On School Buses	

For Wi-Fi Equipment:

Add New Service Request	
<input checked="" type="radio"/>	I seek bids for Category One network equipment or maintenance and operations.
<input type="radio"/>	I seek bids for school bus Wi-Fi network equipment.
Service Type Data Transmission and/or Internet Access	
Function * School Bus Wi-Fi Network Equipment	

Filing the FCC Form 471:

After waiting 28 days and selecting the most cost-effective service provider(s), the next step is to submit and certify the FCC Form 471 during the upcoming application filing window.

All School-Bus Wi-Fi funding requests are considered Category 1 and must:

- Be Filed on a separate Form 471 than other Category 1 funding requests
- Use “School Bus Wi-Fi” as the Form 471 Nickname
- Have a separate FRN for each contract or vendor
- Have a separate FRN Line Item for each different type of service
 - For example, data service, equipment, and installation would have 3 different FRN Line Items
- Select “No” to indicate that the FRN does not include a Special Fiber request
- Select ‘all schools’ as recipients of service that will be served by the buses
- The Form 471 now has a new “Function” option for FRN line items called “Wireless School Bus Service”

- Once chosen, a “Type of Connection” value must be chosen, such as “Wireless data service,” “Equipment,” or “Installation.”

Use these selections on the Form 471 FRN for School Bus Wi-Fi:

Please enter a Funding Request Nickname here ?*

School Bus Wi-Fi Equipment and Installation ← Enter a nickname for this FRN

Purpose ?*

Select first option (*always*) → 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 Inter~~

~~Internet access service with no circuit (data circuit to ISP state/regional network is billed separately)~~

Function ?*

Please select a value

Please select a value

Fiber

Copper

Wireless

Select Wireless School Bus Service (*always*) → Wireless School Bus Service

Other

Miscellaneous

Type of Connection *

Please select a value

Please select a value

Wireless data service

~~Satellite~~

~~Microwave~~

~~Other~~

Equipment

Installation

Select which one of these 3 options describes this FRN →

Additional Resources:

USAC FAQs: <https://www.usac.org/e-rate/learn/faqs/eligible-services/#Bus-Wi-Fi>

RFP Templates: <https://e-ratepa.org/?p=35259>