# School Bus Wi-Fi E-rate Eligibility

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In November, 2023, the FCC released a <u>Declaratory Ruling</u> 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 schoolrelated 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.

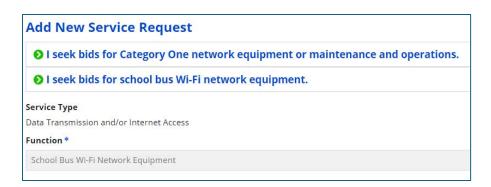
### Filing the FCC Form 470:

- 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: <a href="https://e-ratepa.org/?p=35259">https://e-ratepa.org/?p=35259</a>
- 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 I seek bids for internet access and/or data transmission service. 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:



# Filing the FCC Form 471:

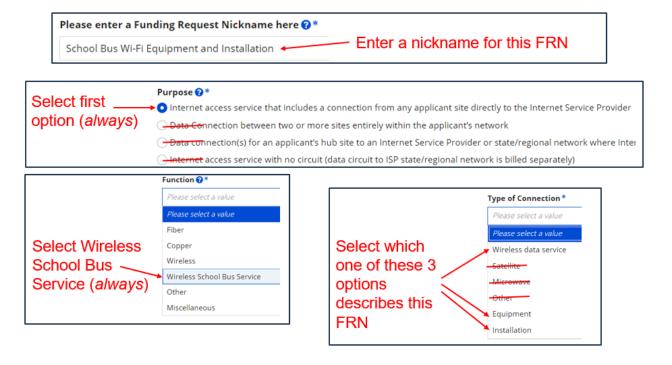
After waiting 28 days and selecting the most cost-effective service provider(s), the next step is to submit and certify the FCC Form 471 during the upcoming application filing window.

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:



# **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