

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

**In the Matter of** )  
 )  
Exception for 2016 E-rate funding allowing ) CC Docket No. 02-6  
eligibility for student WI-FI access on school buses )  
 )

**—EXCEPTION—**

**REQUEST FOR LIMITED EXCEPTION ALLOWING FY 2016 E-RATE FUNDING  
FOR STUDENT WI-FI ACCESS ON SCHOOL BUSES**

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***Party Filing for Exception:***

Cooperative Education Service Agency (CESA) #10  
725 West Park Avenue  
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Contact: Ross Wilson ([wilson@cesa10.k12.wi.us](mailto:wilson@cesa10.k12.wi.us); 715-720-2029)

To Whom It May Concern:

The Cooperative Education Service Agency (CESA) #10 is filing on behalf of four Wisconsin school districts in our service area to receive E-rate discounts for FY 2016 on wireless Internet access on a limited number of their school buses. The districts are: Augusta School District, Fall Creek District, Flambeau School District and the Osseo-Fairchild School District. We think that the results of this one-year funding request will then enable the Commission to decide if it wants to expand this eligibility in 2017 or, more likely, 2018.

It is widely acknowledged that the education of our children and young adults does not end at the school door nor does it end after the last school class period of the day. In recognition of this

fact, the above parties are asking the Commission to: Allow E-rate funding to be used to support Internet access by students on buses,<sup>1</sup> in the above referenced four school districts. More specific information on what exactly we are asking for follows.

Students in many Wisconsin school districts often live in areas of low cellular coverage and limited Internet connectivity options. Like districts in other states, many school districts in Wisconsin are implementing 1:1 programs giving every student access to laptops, Chromebooks, iPads, etc., to enhance engagement with content and encourage self-directed learning. Our project's intent is to provide Internet access to students on school buses during their trips to and from school. (In the four districts that are part of this pilot program it is not unusual for some students to spend more than an hour per school day on the bus.) Internet access on the bus will extend the time that can be spent on learning activities and provide time for students without Internet access at home to do homework.

From a technical perspective, Internet connectivity on the buses will be provided via cellular data plans, most likely utilizing the carriers on the State of Wisconsin Master Contract, corresponding to the coverage available in the particular school district. The wireless device will be *WiRover*, which is a 3G/4G networking gateway providing constant mobile Internet connectivity, even in low coverage areas. This hardware has the ability to connect to multiple cellular and Wi-MAX networks and transitions seamlessly between them as they go in and out of range. The *WiRover* gateway will be installed on each bus in the district school buses. The gateways are GPS enabled for monitoring purposes and also collect data about the quality of every network they are connected to as they travel, allowing detailed coverage maps to be created. The gateway is powered directly by a vehicle's 12V battery which simplifies installation and increases robustness. *WiRover* gateways can be managed from a central interface which can be used to configure, track, reboot, and monitor individual gateways on each bus. *WiRover* routes the Wi-Fi traffic back to the individual school district's network for access to the Internet, thereby meeting CIPA compliance, and adhering to local policies and practices. For students, it functions like a normal Wi-Fi connection at school on their laptop or other mobile device.

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<sup>1</sup> Current E-rate eligible service on buses is very narrowly defined to only cover a bus driver's use of telecommunication services. See the section titled "Eligibility of Category One Services Off-site" at <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services/educ-purposes.aspx>.

The WiRover technology has been successfully installed and is being used on just four buses in the Fall Creek School District. Our request is to expand its use to a total of 13 buses as follows:

- 4 buses in the Augusta School District
- 4 buses in the Fall Creek District
- 4 buses in the Osseo-Fairchild School District
- 1 bus in the Flambeau School District

CESA 10 in cooperation with the four above districts, have worked on a preliminary budget for the initial and ongoing costs as detailed below.

Initial costs (to be born solely by the school districts):

- WiRover gateway hardware: \$1,500 per bus
- WiRover installation fee: \$750 per bus
- \$29,250 total initial costs for thirteen buses

Ongoing (recurring) costs:

- Monthly data plans (anticipate two cellular data plans): \$120 per month per bus
- \$1440 per bus annual recurring costs, \$18720 total annual recurring costs for thirteen buses

We are requesting E-rate funds be eligible to cover only the ongoing (recurring) costs. Based on the above information, here is a cost breakdown for buses in the four school districts:

- 4 buses in Augusta School District ( $\$5760 \times 70\%$  E-rate discount = \$4032 in E-rate support)
- 4 buses in the Fall Creek District ( $\$5760 \times 60\%$  E-rate discount = \$3456 in E-rate support)
- 4 buses in the Osseo-Fairchild School District ( $\$5760 \times 70\%$  E-rate discount = \$4032 in E-rate support)

- 1 bus in the Flambeau School District ( $\$1440 \times 80\%$  E-rate discount = \$1152 in E-rate support)

The total E-rate support for these four school districts for the 2016 funding year is \$12672. We think this is a modest amount of funds to demonstrate the value of the service being provided. The Wi-Fi available to the students utilizing the WiRover technology is the same filtered and monitored Internet access that is provided to the students, within the school building, during the school day. Utilizing Wi-Rover also allows for the collection of rich data including student's time on task, which is the baseline measure for increasing student achievement. District surveys of students have also been developed and administered to gauge students' perceptions and attitudes toward having Wi-Fi available to them on the bus.

We hope you will grant this Exception request and allow the limited use of E-rate funds for Internet connectivity on student buses. We are certain this will be of benefit to our students. Thank you for your consideration of this request and please contact me if you have any questions.

Sincerely,



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