

**Before the  
Federal Communications Commission  
Washington DC 20554**

In the Matter of )  
 )  
Wireline Competition Bureau Seeks ) WC Docket No. 13-184  
Comment On Proposed Eligible Services )  
List For The E-Rate Program )

**COMMENTS ON THE PROPOSED ELIGIBLE SERVICES LIST FOR THE E-RATE PROGRAM**

Kajeet, Inc. is a service provider serving over 2,500 clients who are primarily E-Rate eligible entities including schools, school districts, and libraries in all 50 states, Puerto Rico and the District of Columbia. Our primary focus for over a decade has been the provision of broadband access for educational use by students, staff, and library patrons who would otherwise lack such access and suffer the consequences of an inequitable and inferior learning environment compared to their more economically advantaged peers.

Kajeet provides Education Broadband access primarily via commercial 3G, 4G, and 5G wireless networks using a variety of devices including, but not limited to, education-configured mobile hotspots, embedded LTE student computing devices (such as Chromebooks, laptops, and tablets), fixed wireless routers (in student homes, outdoor facilities, community centers, parks, etc), and to provide Wi-Fi in institutionally owned vehicles (school buses, library bookmobiles, mobile classrooms, STEM buses, etc.). Due to our focus on the issue of broadband access equity off-campus, eligibility for our services under the E-Rate program has been limited to the FCC & USAC approved case of library bookmobiles, which are considered mobile library branches and thus also considered eligible locations.

In the years preceding the COVID pandemic, and increasingly during the COVID pandemic, we have seen institution-owned mobile educational facilities (primarily school buses) play an important role in facilitating increased broadband access for student learning. Much like library patrons of a mobile library branch, students both travel to (and on) these facilities as part of their educational journey. Also, like mobile library branches, these mobile educational facilities are owned, operated, and managed by E-Rate eligible entities (schools and school districts); are serving eligible users (students and staff); for eligible purposes (learning). The network access provided is owned and managed by the eligible entity (or their designated provider under their direction) with appropriate network controls and safeguards to ensure safe and on-task educational use, including support for CIPA compliance for connected student devices.

In the section “**Eligibility Explanations for Certain Category One and Category Two Services**” of the proposed 2022 Eligible Services List<sup>[1]</sup>, is stated “*Off-campus use, even if used for an educational purpose, is ineligible for support and must be cost allocated out of any funding request.*” This is understood not to apply to library bookmobiles as they are considered eligible locations of a library as a mobile library branch. Kajeet, Inc. requests this clarification for library bookmobiles be explicitly stated so as to avoid confusion with “*off-campus*” wording. Kajeet, Inc. furthermore requests a similar clarification for mobile educational facilities owned and operated by an eligible school, i.e. school buses, where the network service is used by eligible users for eligible educational use, and is managed and monitored for such compliance.

Respectfully submitted by:

Daniel J. Neal  
CEO, Chairman, & Founder  
Kajeet, Inc.

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<sup>[1]</sup> *Wireline Competition Bureau Seeks Comment on Proposed Eligible Services List for the E-Rate Program*, WC Docket No. 13-184, FCC DA 21-1062 (rel. August 27, 2021) (*Public Notice*).