

CELLULAR/WIRELESS DATA ELIGIBILITY TEST

Cellular data plans remain eligible only if the applicant can show the service is the most cost-effective means of providing on-campus broadband connectivity. USAC and the FCC have made it clear that the cost-effectiveness test will be difficult to pass except in special circumstances.

NOTE: E-rate funding for individual data plans or air cards for individual users is not cost effective when users of those services can already access the Internet through internal wireless broadband networks.

Applicants are required to select cost-effective solutions when seeking E-rate support. Individual data plans are generally not a cost-effective means for applicants to purchase on-campus Internet connectivity. (Note: Off campus use is not eligible.)

Further, cellular data plans appear to be a duplicative service when also requesting funding for high-capacity connections to schools buildings. Duplicative services are services that deliver the same functionality to the same population in the same location during the same time. The FCC determined that duplicative services contravene the requirement that funding meets the “reasonable needs and resources” of applicants.

To ascertain the eligibility of monthly service plans for wireless mobile Internet access service, including air card, MIFI or data plans used for educational purposes, please provide complete answers to the following.

A. PRELIMINARY ELIGIBILITY OF SERVICES

Provide an explanation of why you are requesting funding to purchase cellular data connections rather than building out your Local Area Network (LAN)/Wireless Local Area Network (WLAN):

Describe who will use the individual data plans and how the connections will be used.

Include a breakdown of the number of data plans for students, teachers and other staff.

Include where the services are being used.

Include whether any of the individual data plans come with free or reduced prices for mobile devices.

As E-rate does not support the cost of mobile devices, describe the cost allocation used and include the amount deducted attributable to the device from the cost of the service plan. Your cost allocation must be based on tangible criteria and reach a realistic result.

Are students, teachers and/or staff that use the individual data plans able to take the devices associated with those data plans off campus?

Can some or all of the students, teachers and/or staff use the data services off campus?

If so, provide the breakdown for how many students, teachers and/or staff can use the data services off campus.

Because E-rate only supports on-campus use—not off-campus use—what portion of the service cost have you deducted based on off-campus use? How did you allocate costs and what records of off-campus traffic usage did you base it on, and can you provide them?

If not, why not?

If not, what safeguards do you have to prevent off-campus use?

B. DUPLICATIVE SERVICES AND COST-EFFECTIVENESS

For each building used by the students, teachers, or other staff with access to the individual data plans for which you are seeking funding:

How much bandwidth do you need to meet the on-campus educational needs of your students?

How much bandwidth do the individual wireless data plans for which you are seeking support provide for the students, teachers, and staff in the school?

What other broadband connections do you have to that building and how much bandwidth do such connections provide?

How much bandwidth does the individual wireless data plans have?

If the total exceeds the total needed to meet the on-campus educational needs of your students as stated above, please explain why/how your request does not represent a request for duplicative services.

For each building, did you investigate the cost of providing the same wireless data access by expanding the capacity of your existing LAN to handle additional bandwidth required? If not, why not?

If you did, what was the cost for such upgrades and explain why purchasing such upgrades was not more cost effective than purchasing the wireless data plans.

Please provide supporting documentation, including Requests for Proposals or other information to provide potential bidders with a more detailed description of the service you sought, i.e., to provide connections to the mobile devices.

If you compared the cost of cellular data plans to the cost of upgrading your broadband capacity to handle the wireless devices, did you compare the prices of the options in the marketplace BEFORE considering any E-rate discounts or only AFTER reducing the prices by the expected E-rate discounts?