

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)
)
Satellite Industry Association Request)
For Amendment of the U.S. Table of)
Frequency Allocations to Designate) RM-9911
2500-2520/2670-2690 MHz Frequency)
Bands for the Mobile-Satellite Service)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

STATEMENT IN SUPPORT
OF THE NATIONAL ITFS ASSOCIATION COMMENTS OPPOSING THE
SATELLITE INDUSTRY ASSOCIATION PETITION FOR RULEMAKING

On behalf of South Carolina Educational Television Commission ("SCETV"), we hereby transmit its comments in support of the comments filed by the National ITFS Association ("NIA") opposing the Petition for Rulemaking filed by the Satellite Industry Association ("SIA") that proposes to amend the U.S. Table of Frequency Allocations to allocate the 2500-2520 MHz and 2670-2690 MHz bands for the Mobile Satellite Service ("MSS"). These frequencies have been previously allocated and are in use by hundreds of incumbent ITFS and MMDS service providers, including SCETV.

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List A B C D E

South Carolina Educational Television Commission's
Comments
Opposing the Satellite Industry Association
Petition For Rulemaking

South Carolina Educational Television Commission's (SCETV) mission is to provide a statewide educational communications network. The primary purpose of the network is to provide comprehensive educational opportunities to public schools, colleges, universities, and for adult continuing education. The service is to support and enhance training for state agencies, private industry, and individuals, and to offer programs of cultural, historical, and educational significance to the general public. Its statewide telecommunications facility has been in continuous adaptation over the years to new technologies and new instructional procedures and formats.

South Carolina is a primarily rural state with a 3.7 million population (1996). Of that number 669,342 (1998-99) are students, of which approximately 63% reside in rural areas. There are 86 public school districts and 1,114 public schools (Fall 1999).

In 1973, SCETV received its first "Construction Permit" for an ITFS system. Since then, a full statewide ITFS network, at a cost of more than \$28 Million dollars, has been designed and implemented. Currently, there are Twenty-nine(29) ITFS Distance Education Learning Centers in operation and Six(6) new centers that will begin operation at the beginning of the 2000-2001 school year. These centers serve 723 schools with the remaining 391 schools slated to receive service as funds become available.

HISTORY OF SCETV DELIVERY SYSTEM

SCETV's public school delivery system was designed around the premise that each school district in the state should have local control and local input into the educational television programming that was offered to each individual school but more

important, to each individual classroom teacher. A teacher should have the opportunity to decide when a particular lesson out of a particular educational television series was shown in their particular classroom. A common statewide delivery system would not afford the teacher this choice as they would have to use the lesson on the day and at the time it was broadcast from SCETV's Master Control in Columbia.

To address this issue, SCETV began establishing (in the mid 1960's) local distribution systems called Tape and Delay Centers. As the name implies, these centers video taped the programs as they were broadcast and then later played them back at a time more suitable to the individual teachers needs. The distribution systems consisted of a microwave and cable network leased from Southern Bell. The Tape and Delay Centers were setup within the bounds and limits of a particular Telco service area and could only feed the schools that were connected directly to that local loop.

While the leased system allowed SCETV to serve a large number of facilities, there remained a large number of rural locations without access to the network. The inability to serve those locations, coupled with the increases in leasing charges and the availability of new technology led to the implementation of a state owned delivery system. In 1982, SCETV received funding to replace the existing leased cable system with its own system. Although the initial funding stipulated that only those schools connected to the leased system could be converted, SCETV began designing a full statewide delivery system that would extend service into every school in the state.

The new delivery medium selected was Instructional Television Fixed Service (ITFS). ITFS, allows one-way video and audio to flow over the four ITFS channels to the schools within its service area. In a local tape and delay center configuration, programming could be adjusted to accommodate the scheduling needs of the individual district and/or teacher. In 1992, SCETV began adding a studio to each existing local ITFS system for live-interactive instruction. Programming can now originate in the studio or from video tape. With the addition of the studio component to the tape and delay center concept the centers were renamed Distance Education Learning Center (DELIC) too more clearly define their function.

Since receiving the initial replacement funding, SCETV has received additional funding to build-out its planned statewide ITFS network. The funding has been used to establish Fourteen(14) new Distance Education Learning Centers bringing the total

DELC network to Thirty-five(35).

SCETV's statewide ITFS DELC network consists of Forty-nine(49) 10 watt transmitters and Fifteen(15) 1 watt transmitters (Table 1). The 10 watt transmission facilities are used as the main transmitter and serve the schools within a single or multiple school districts. The 1 watt transmission facilities are used as studio-to-transmitter links.

	10 Watt	1 Watt
A - Group	7	3
B - Group	9	3
C - Group	9	3
D - Group	8	1
E - Group	7	0
F - Group	4	1
G - Group	5	4
	49	15

Table 1

IMPACT ON SCETV ITFS DELIVERY SYSTEM

In the matter before the "Commission" concerning the "Petition for Rulemaking" by the Satellite Industry Association to Amend the U. S. Table of Frequency Allocations to Designate the 2500-2520/2670-2690 MHz Frequency Bands for the Mobile Satellite Service; if granted, it would have a devastating affect on SCETV's statewide ITFS network. (Exhibit A is a South Carolina school district outline map that shows the overall adverse affect on SCETV's statewide ITFS network).

These frequencies equate to ITFS Channels A1, B1, A2 and part of B2 as well as part of G3 and G4. The reallocation would affect Twenty-six(26) of the Thirty-five(35) ITFS Distance Education Learning Centers; 597 of the 723 schools currently served and approximately 50% of the total statewide student population. It would also

mean that SCETV could not serve 323 (152,919 students) of the remaining 391 schools that are slated to receive ITFS service from one of its ITFS systems. (Table 2).

ITFS Stations Affected by the Proposed Reallocation:

Current Operating Stations		Currently Served		Unserved	
		Schools	Students	Schools	Students
6	A - Group	132	75,586	76	30,309
8	B - Group	177	116,413	122	60,638
6	G - Group	118	66,715	109	55,439
	Total	427	258,714	307	146,386

Operational 2000-2001 School Year		Currently Served		Unserved	
		Schools	Students	Schools	Students
2	A - Group	37	18,107	3	1,300
2	B - Group	77	32,002	0	0
2	G - Group	56	23,880	13	5,233
	Total	170	73,989	16	6,533
Grand Total - All Stations		597	332,703	323	152,919

Table 2

ITFS UTILIZATION

According to SCETV's 1999-2000 Utilization Survey, the Twenty(20) operating DELC's that would be affected by the change aired over 55,000 instructional programs. They included individual lessons from the center's video tape library as well as live-interactive instruction and locally produced programming. Exhibits B, C, and D show a listing of the locally produced programming that was aired over the various ITFS systems.

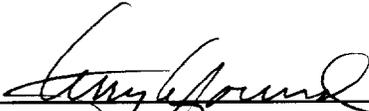
The Six(6) new ITFS systems (73,989 students) that will begin operation at the beginning of the 2000-2001 school year, have been supplied with a video tape library (over 1,500 hours) of instructional television programs approved by the South Carolina Department of Education. They are also equipped with a distance learning studio and have made plans to offer live-interactive instruction during the school year.

CONCLUSION

For these reasons, SCETV provides these comments and also supports the comments of the National ITFS Association ("NIA") and urges the Commission not to institute a Notice of Proposed Rulemaking in this proceeding.

Alternatively, if the Commission does institute a rulemaking proceeding, SCETV urges the Commission to consider the issues raised in its and the NIA comments and retain or adopt rules consistent with these comments.

Respectfully Submitted,



Terry Pound, Vice President
K-12 School Services

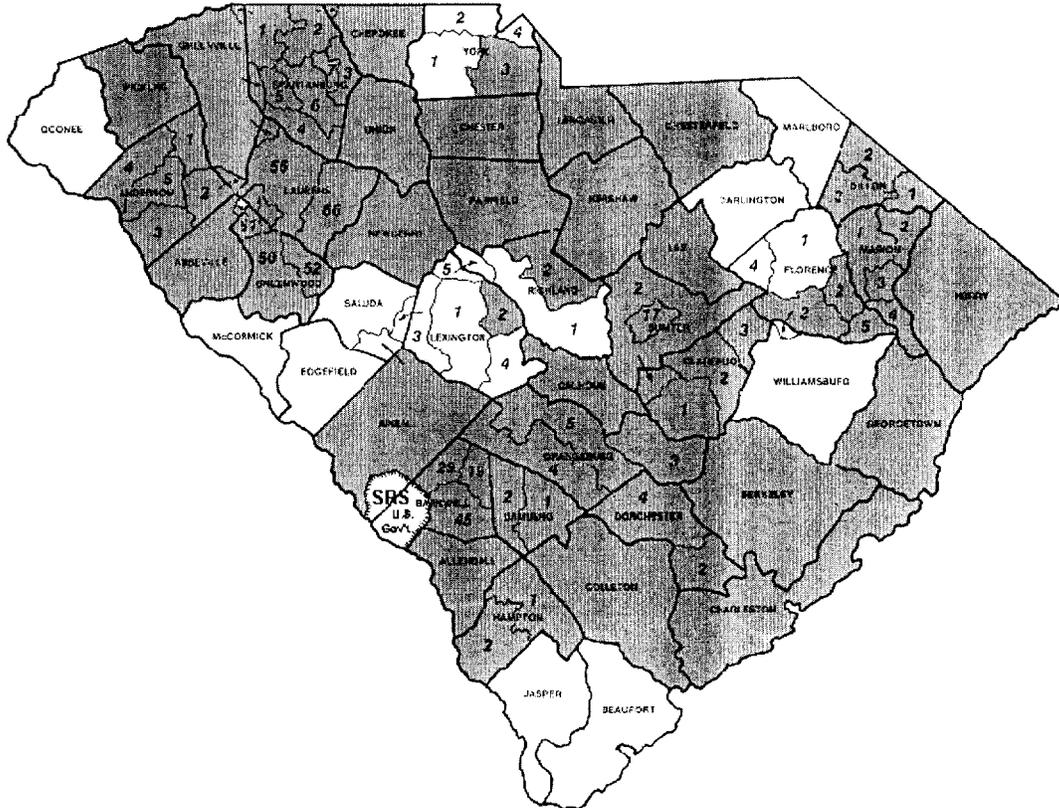


Leslie W. Griffin, Jr., Vice President
Engineering

South Carolina Educational Television Commission
1101 George Rogers Boulevard
P. O. Box 11000
Columbia, South Carolina 29211

Date: Aug. 23, 2000

EXHIBIT A



Note: Shaded area indicates the school districts that would be affected if the proposed frequency reallocations are granted.

EXHIBIT B

ITFS UTILIZATION SURVEY

(July 1999 - June 2000)

A. LOCALLY PRODUCED FORMAL CLASSROOM INSTRUCTION

DELG (Group)	Subject	Number of Schools	Number of Students	Students Passing	Average Grade
Blackville (A)	History 101	4	24	20	C
	History 102	3	9	9	B
	English 101	5	55	47	B
	English 102	4	34	32	A
Charleston (A)	AP Government	2	10	10	81
	AP Economics	2	9	9	79.5
	Intro. Health Science(Fall)	3	21	14	70
	Intro. Health Science(Spr.)	2	19	8	70
Chester-Union (B)	Psychology 101 (dual credit)	2	25	25	90
	Psychology 103 (dual credit)	2	20	20	90
Chesterfield (B)	Chem. for the Technologies	7	14	14	B
Colleton (F)	Spanish I	2	22	NA	NA
	Spanish II	2	13	NA	NA
	Spanish III	1	7	NA	NA
	Western Civ. 101 (dual credit)	3	37	NA	NA
	Western Civ. 102 (dual credit)	3	37	NA	NA
	French I	1	11	NA	NA
Florence (G)	Espanol I	7	203	178	85
	Espanol II	7	228	207	85

DELC (Group)	Subject	Number of Schools	Number of Students	Students Passing	Average Grade
	Math for the Tech. (Tech Prep)	8	14	NA	NA
Horry (B - STL)	Intro. To Criminal Justice	1	5	5	C
Lancaster (G - STL)	Psychology 101	4	46	35	C+
	Criminal Justice 101	4	45	37	B
Lexington 2 (G)	Education 591 (re-certification from Converse College)	3	NA	NA	NA
Marlboro (E)	Algebra I	5	68	NA	90
	English I	5	45	NA	90
Rock Hill (A)	Applied Biology (Tech Prep)	10	12	12	A

NOTE:

- Average grade reflects average of those students who passed the course.
- Data furnished by DELC personnel who are district personnel.
- NA=data not available from DELC
- College credit courses are those numbered in the 100 series. Those students who passed the course received dual credit (high school and college). The higher education institutions who taught these courses offered them at reduced tuition, thus a savings to the students.
- The Marlboro courses were freshman high school courses offered to 8th grade students. Thus, these students entered high school with these courses out of the way and could take additional courses while in high school.
- Transportation cost savings were realized in the teacher certification course in the Chester/Union courses, the Marlboro courses and the Lancaster courses.
- The AP courses offered by the Charleston DELC were the only way to provide these courses to the school in the McClellanville area.
- The low number of students passing the Intro. to Health Science was the result of students being assigned to course involuntary and without appropriate screening.

EXHIBIT C

B. LOCALLY PRODUCED STAFF DEVELOPMENT PROGRAMMING

DELDC (Group)	Subject	No. of Schools	No. of Teachers/Staff
Aiken (B)	Special Ed. In-service	10	20
	Laughter in the Classroom	37	700
Anderson (G)	What Do I Do, Stu? (computer training)	19	500
Berkeley (B)	ADEPT	35	900
	OSHA Training	35	2100
	Superintendent's message to district	35	1940
Charleston (A)	Periodic Review (IEP)	79	242
	Home Bound Procedures	79	240
	Supt.'s Welcome Back to School	79	3106
	PTA Public Service Announcement	79	3106
Lancaster (G - STL)	Superintendent's Address to District	15	300
Colleton (F)	Textbook Adoption	17	300
	Blood Borne Pathogens (certification)	17	950
	Employer Benefits	17	950
	School Bus Training	7	20
	Fire Safety/Disaster/EPD	17	950
Dorchester (B - STL)	Superintendent's Message to District	16	1481
	Crisis Debriefing	16	167
	PSA Identification Process	4	1018
Georgetown (G - STL)	Insurance Benefits Presentation	20	400+
	Deferred Compensation Presentation	20	400+
	School Safety Presentation	20	400+
Greenville (A)	"Dialogue" - School News Program (6 programs)	37	58586
Horry (B - STL)	BookWhere (statewide)	NA	NA
	Media Specialist	18	40

DELC (Group)	Subject	No. of Schools	No. of Teachers/Staff
	Discuss - Grollier (statewide)	NA	NA
	Discuss for Internet Access (statewide)	NA	NA
Kershaw-Lee (A - STL)	Superintendent's message to district	18	1460
	OSHA Training	18	1460
	Kershaw County School Dist. Benefits Package	18	1460
Lexington 1,3 & 4 (E)	"Teacher of the Year" Special (12 candidates)	NA	NA
	National Certification Taping (18 candidates)	NA	NA
	Project Crisis Instructors (2 programs)	NA	NA
	ACTS Lecture	NA	NA
Lexington 2 (G)	Insurance Benefits	19	1200
Oconee (E)	Insurance Update	21	1200
	Computer Training - "Installation of Spectrum Software"	NA	20
	Adult Ed. Presentation (statewide)	NA	NA
	Emergency Preparedness Drill	21	125
Richland I (F)	ITS Happening	50	80
	In-Service for elementary teachers	30	1241
	Elementary Math Instruction Plan	30	1141
	Special Ed. Modifications for PACT	NA	2500
	Academy Links	50	2500
	Superintendent's Address	55	3000
Kingstree (C)	Supt. & Bd. Chairman -Teacher of Year Award	15	6360
	Goals Based Education Model	15	640
	Stress and Anger Management	15	640
	Sexual Harassment	15	640

EXHIBIT D

C. LOCALLY PRODUCED STUDENT ENRICHMENT PROGRAMMING

DELDC (Group)	Subject/Topic (grade level)	No. of Schools	No. of Viewers
Aiken (B)	Elementary Spanish	19	11,108
Blackville (A)	ALBA 2 Presents (Adult Ed.)	NA	NA
	Dirk Sippy on Seft-Esteem (Adult Ed.)	NA	NA
	The World Around Us (Environmental Elem/Mid)	NA	NA
Charleston (A)	Around the World w/ Neil Peterson (K-12)	79	43,495
	Can-Do Earth Kam Project (K-8)	79	43,495
	21 st Century Community Learning Center	6	1,500
	Take Me Out to the Ball Game	79	43,495
Colleton (F)	Safe Kids	17	6,800
	Rice Festival	17	6,800
	Arts Council	17	6,800
Dorchester 2 (B - STL)	Truancg: Astrdent Forum	7	9,191
	The Writing Contest	1	913
	Quiz Bowl 2000	5	1,400
Georgetown (A)	"Teacher of the Year Award Banquet	NA	NA
Greenwood (B)	"Focus 1999-2000" (<i>Focus</i> is a series of student enrichment programs that originate from the Greenwood DELC. Topics vary with people with expertise in their perspective field serving as guests. Students from different schools serve as program host. <i>Focus</i> is broadcast statewide on the SCETV Satellite system. Call-in questions are accepted during the programs. See attached list for program topics.)		
Horry (B - STL)	Homework TV 5-6 p.m. (all ages)	NA	NA
Kershaw-Lee (A - STL)	SAT Question of the Day (daily entire school year)	1	1,202
	CHS Course Selection	1	1,101
	LHS Course Selection	1	1,202

DELC (Group)	Subject/Topic (grade level)	No. of Schools	No. of Viewers
Lancaster (G - STL)	Learn TV (A collection of approximately 116 programs produced by broadcast journalism students utilizing DELC facility and equipment. All programs aired on ITFS channels to schools on a daily basis and aired also on community access cable channel. Program categories are: Educational, civics and government, general interest and special events.)	8	6,000+
Lexington 1,3 & 4 (E)	Hispanic community outreach speakers (9)	NA	NA
Oconee (E)	Summer Reading Programs	11	5,000
Richland 1 (F)	Visual Literacy Festival Showcase	50	27,000
	Elementary Spelling Bee	50	27,000
	School Attendance Awareness	50	27,000
	PACT Tips	50	27,000
	Parenting Pointers (Guidance Education)	50	27,000
	Teen Talk Show	50	27,000
	Reading is Fundamental	50	27,000
	Spotlight One	50	27,000
Williamsburg (C)	KSH Morning News	NA	NA

CERTIFICATE OF SERVICE

I AVENA TAVLARIDES hereby certify that a true copy of the foregoing Comments on the Satellite Industry Association's Petition for Rulemaking was mailed first-class, postage prepaid, this 28th day of August, 2000 to the following:

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