

Office of the Executive Vice President
and Provost

234 Morrill Hall
100 Church Street S.E.
Minneapolis, MN 55455-0110

August 24, 2000

Federal Communication Commission
445 12th Street, SW
Washington, DC 20554

RECEIVED

AUG 28 2000

FCC MAIL ROOM

RE: **Opposition by the University of Minnesota** to:

"Petition for Rulemaking" (RM-9911) by the SIA to amend the U.S. Table of Frequency Allocations to Designate the 2500-2520/2670-2690 MHz Frequency Bands for the Mobile Satellite Service.

Dear Commissioners,

The University of Minnesota is a member of the National ITFS Association (NIA). Since 1971, we have been the proud licensee of two, four channel ITFS educational broadcast licenses. WHR 636 (C group) serves the Minneapolis and St. Paul, Minnesota communities and WIG 34 (G group) serves Rochester, Minnesota. Our distance educational program, UNITE (University Industry Television for Education) Instructional Television, delivers live via ITFS an average of 55 Institute of Technology credit courses per semester to approximately 400 students per term. Typically, 35 students per year receive their Master's degree by taking courses via the UNITE system. Of our 34 member sites, approximately 40% use the ITFS - I band for immediate audio response back to the classroom. For 29 years, the University of Minnesota UNITE System has remained dedicated to providing continuing educational opportunities for engineering and science professionals through the use of our ITFS channels. Our continued ability to provide this important service to our industrial customers such as 3M, IBM, Mayo Foundation, Imation, Silicon Graphics Inc., Unisys, Medtronic, Guidant, Cypress Semiconductor, Honeywell, Alliant Techsystems, ADC Telecommunications and many others, is threatened by the Satellite Industry Association petition which should be denied.

It is critical that the entire ITFS spectrum be left to educators, who continue to provide valuable distance learning opportunities to serve students in K-12 through higher education. It

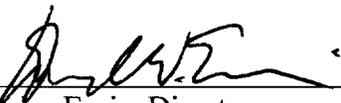
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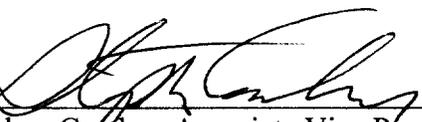


would be a tragedy to see this invaluable educational service disrupted or its very existence threatened by the SIA Petition.

The University of Minnesota strongly supports the NIA's position of opposing the "Petition for Rulemaking", RM-9911 filed by the Satellite Industry Association.

Respectfully submitted on behalf of the Regents of the University of Minnesota,

By 
Douglas Ernie, Director
UNITE Instructional Television
University of Minnesota

By 
Stephen Cawley, Associate Vice President and Chief Information Officer
Office of Information Technology
University of Minnesota

By 
Robert Bruininks, Executive Vice President and Provost
University of Minnesota

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply was mailed this 24th day of August, 2000 to the following:

Satellite Industry Association
225 Reinekers lane
Suite 600
Alexandria, Virginia 22314



Douglas Ernie, Director
UNITE Instructional Television
University of Minnesota