

ORIGINAL

ACUTA: The Association for Telecommunications
Professionals in Higher Education
152 West Zandale Drive, Suite 200
Lexington, KY 40503
(859)278-3338

August 28, 2000

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM-9911

Re: ~~RM-9910~~/In the Matter of Satellite Industry Association
Request For Amendment of the U.S. Table of Frequency
Allocations to Designate 2500-2520/2670-2690 MHz Frequency
Bands for the Mobile-Satellite Service

Dear Ms. Salas:

On behalf of ACUTA: The Association for Telecommunications Professionals in Higher Education, I would like to urge the Federal Communications Commission to deny the above referenced petition of the Satellite Industry Association (SIA).

ACUTA: The Association for Telecommunications Professionals in Higher Education is a non-profit educational association of nearly 850 colleges and universities, including many that hold ITFS licenses. ACUTA members include both state-supported and private non-profit higher education institutions, ranging from large universities to small private colleges and community colleges.

ACUTA supports in its entirety the filing by the National ITFS Association in opposition to the SIA petition. The SIA petition fails to recognize the fact that virtually all of the bands that are requested for reallocation to the Mobile-Satellite Service are already in use by licensees of the Instructional Television Fixed Service (ITFS), including educational institutions, hospitals, school systems, and other non-profit educational organizations.

The reallocation of the requested spectrum would not serve the public interest. In fact, the SIA has failed to demonstrate how its requested reallocation would not seriously disrupt the educational programming that now forms the basis for ITFS service throughout the United States. In addition to disrupting current licensed uses of these bands by ITFS license holders, the requested reallocation would interfere with the rapidly expanding use of ITFS channels including the impending use of this spectrum for two-way broadband data service as recently authorized by the Commission.

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The bands in question are currently used by ITFS license holders for one-way educational video services, including televised courses that are viewed by college and K-12 students and other students on their campuses, adult students at community centers and in workplaces, medical and hospital personnel, and other individuals enrolled in these courses. Although traditionally used for one way point-to-multipoint transmission of audio and video educational programming, the uses of ITFS spectrum are changing. The Commission recently authorized ITFS channels to be used for two-way communications, and ITFS licensees are expecting major growth in the use of this spectrum for two-way audio, video and data communications.

The reallocation proposed in the SIA petition would seriously harm the implementation of these two-way communications capabilities, by taking a substantial number of the A, B, G and H channel groups, and over one-fourth of the entire ITFS band, for MSS use. The channels in question are needed in order to provide interference-free "upstream" capacity and thereby facilitate two-way communications. ACUTA is in agreement with the National ITFS Association that this would not serve the public interest.

In addition, we do not believe that the SIA has shown in its petition a viable technical means by which ITFS and the proposed MSS services can successfully share these bands.

For these reasons, we urge the Commission to act in the public interest to preserve the important educational resources that reside on the bands currently allocated to the ITFS, by declining to reallocate any portion of the ITFS channels to the Mobile-Satellite Service or any other use. We respectfully request that the Commission deny the SIA's petition to initiate a rulemaking in this regard.

Respectfully submitted,

ACUTA: The Association for
Telecommunications Professionals in
Higher Education


By: Anthony Tanzi/RCDD
President
ACUTA
152 West Zandale Drive
Suite 200
Lexington, KY 40503

August 28, 2000

cc: Satellite Industry Association

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:

Clayton Mowry
Executive Director
The Satellite Industry Association
225 Reinekers Lane, Suite 600
Alexandria, VA 22314

Charles Dziedzic
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
The Portals
Washington, D.C. 20554

Rodney Small
Office of Engineering and Technology
Federal Communications Commission
445 12th Street. S.W.
The Portals
Washington, D.C. 20554


Avena Tavlarides