

LAW OFFICES
RICHARD F. SWIFT
SUITE 350
2175 K STREET, N. W.
WASHINGTON, D. C. 20037

TEL: (202) 293-7979
FAX: (202) 659-5711

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 28, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
455 Twelfth Street, SW
Washington, D.C. 20554

Re: RM-9911

Dear Madam:

This letter is submitted on behalf of the San Bernardino Community College District (the "College" or the "District"), licensee of Instructional Television Fixed Service ("ITFS") stations operating on Channels B-1, G-1, G-3, and G-4 at San Bernardino, California, and its surrounding environs.

Pending before the Commission is the above-referenced petition for rule making filed by the Satellite Industry Association ("SIA") which 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. In filing this letter, the District supports the positions enunciated by the National ITFS Association ("NIA") in its opposition to the proposal.

As the NIA points out, the SIA proposal would eviscerate the ITFS service provided by educational institutions throughout the country including the decade long use by the District of its licensed ITFS Channels B1, G1, G3, and G4. Three of these Channels, B1, G3 and G4, would be directly and adversely affected by the proposed reallocation. Thus, the SIA allocation plan would effectively abolish the extensive educational service which the College has performed for approximately 1200 students per semester. The rush to provide frequencies for new technologies does not presume the destruction of existing ITFS services which are essential to the education of the public, particularly when it has become increasingly clear that education in this country has become a prime concern of our society.

SIA's petition simply does not provide a basis for its drastic proposal but represents a presumptive effort to obtain frequency spectrum to the detriment of the College and its students. SIA does not even attempt to justify the adverse impact its proposal would have on vital

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incumbent services like those provided by the College. In consequence, there is no foundation for initiating the requested rule making, which, on its face, is a blatant effort to seize spectrum space.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard F. Swift". The signature is fluid and cursive, with a long horizontal stroke at the end.

Richard F. Swift
Counsel for
San Bernardino Community
College District

cc: Satellite Industry Association