ORIGINAL

EX PARTE OR LATE FILED

Minnesota Tele-Media

P.O. Box 1087
Marshall, MN 56258
Phone (507) 537-6984
Fax (507) 537-7327

RECEIVED

FEB 5 2001

FCC MAIL ROOM

Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Powell
Commissioner Tristani
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911

January 30, 2001

Dear Commissioners:

On behalf of the Minnesota Tele-Media (MTM) Board of Directors and its member educational institutions and constituents, I am writing to express concern about the future of the ITFS spectrum. As you are aware, reallocation of this spectrum is under consideration in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. ITFS is an important part of MTM's member institutions' educational programs. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only for our members and the parties they serve but also for numerous communities in our service region.

Minnesota Tele-Media is a joint powers organization involving Minnesota West Community and Technical College, Ridgewater College: A Community and Technical College, Southwest State University and the Southwest/West Central Service Cooperative. MTM was formed in the early 1980s to provide research, planning, funding assistance, implementation and organization of telecommunications services for the educational institutions in southwestern and west central Minnesota that the parties serve.

ITFS channels licensed to MTM have been used for fifteen years to serve lifelong learners in our service region. These channels have been used in conjunction with other technologies (e.g., point-to-point microwave, T1s and fiber optics cable and equipment) to provide two-way video instruction for K-12, post-secondary and community education. K-12 students have benefited from school districts sharing instructors to broadcast low-incidence courses such as foreign languages, advanced mathematics, business education and sign language. Colleges have used the network to deliver courses leading to degrees for learners in the region's more isolated communities. For example, Minnesota West College delivers courses enabling students to achieve their Associate of Arts degree over a four-year period with only an occasional trip to campus for hands-on science lab activities. Community education programs delivered over the network have included such varied offerings as estate planning and cooking classes.

No. of Copies rec'd 0
List A B C D E

For several years, MTM has also leased excess ITFS channel capacity to "rural cable television" providers as permitted by FCC rules. These leases have allowed many of the region's rural residents to receive cable television services that otherwise have been unavailable. Revenue from these leases has helped our member educational institutions defray distance learning network operational costs and have even been used to support innovative distance learning projects by local educators.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. This rule change has expanded the educational power of ITFS. Now, ITFS offers rural school districts a cost-effective alternative for broadband Internet access. Perhaps, most importantly, it offers students and adult learners, at home and at work, broadband access that is currently unavailable in many parts of our rural service region. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. MTM is currently working with wireless communications providers to bring this capacity to parts of our service region.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, our member educational institutions' distance education infrastructure will face an uncertain future. We will likely incur new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. In either scenario, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community and to underserved communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. Minnesota Tele-Media hopes that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

Daniel J. Baun
Coordinator
dbaun@southwest.msus.edu
(507) 537-6978

Cc: Minnesota Tele-Media Board of Directors