

February 21, 2001

Honorable Michael Powell  
Chairman  
Federal Communications Commission  
445-12<sup>th</sup> St., S.W.  
Washington, DC 20554

Dear Chairman Powell:

In response to the Notice of Proposed Rulemaking and Order in the captioned proceeding, FCC 00-455 released on January 5, 2001, I urge you to preserve the 2500-2690 MHz band currently allocated for and used by stations operating in the Instructional Television Fixed Service (ITFS) and the Multichannel Multipoint Distribution Service (MMDS).

The separate universities of the California State University (CSU) system provide hundreds of hours of instructional programming each week. Many of the students served by these ITFS stations live in the remote and rural areas of California with few other ways to access higher education. Many more live in urban centers, impeded by considerable distances and heavy traffic from participating in courses on campus. In addition to serving thousands of our enrolled students through ITFS, the CSU is reaching out to K-12 students and adult learners with advanced placement courses, educational enrichment programs for children in the primary grades, such as the "Jason Project," and English as a Second Language (ESL) instruction.

Now, as a result of recent technological developments and Commission regulations, we are on the brink of moving to high-speed, two-way fixed wireless data transmission services, allowing us to extend broadband Internet access to our students, faculty, and others in and around our campus communities. With this significant new interactive mode of transmission, we can better serve California learners of all ages wherever they are and at times that best accommodate their schedules.

Having made substantial investments in the development of the ITFS spectrum, the CSU takes very seriously the potential threat to the spectrum posed by the Third Generation mobile services, known as "3G." The CSU and the other public higher education systems in California are facing an unprecedented increase in enrollment, commonly referred to as "Tidal Wave II." The CSU alone, which currently serves more than 370,000 students, is anticipating an influx of some 117,000 additional students over the next decade – an increase of approximately 40 percent. We have undertaken already a number of steps to accommodate this tremendous growth in enrollment, including the creation of three new universities – the third will become a freestanding university in 2002. ITFS and the high-speed, wide area networks that our spectrum will now support are essential to our efforts to serve more efficiently a much larger universe of students. Moreover, maintaining spectrum for educational purposes will also help us to keep instructional costs down.

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The CSU is using ITFS is to deliver instructional programming to California's K-12 classroom teachers and teaching credential candidates. For instance, over the last ten years, CSU, Dominguez Hills, outside Los Angeles, has used ITFS to help some 10,000 students obtain their teaching certificates. With one of every ten of our state's teachers teaching under emergency certificates, the challenge is to support these teachers as they confront the day-to-day challenges of today's hard-to-staff classrooms while, at the same time, helping them to obtain a full teaching credential. If we fail to support adequately these teachers, data demonstrates that more than half of them will leave the teaching profession permanently within 1 – 3 years. With the nation confronting a shortage of teachers in excess of 2.2 million over the next 10 years, some 250,000 – 300,000 new teachers will be needed in California alone, we can ill afford to lose our capacity to deliver services to these emergency credentialed teachers.

Similarly, the nation is grappling with a severe shortage of nurses, with the most severe shortage in California. ITFS provides a flexible, relatively low cost way to set up service sites for nursing students in hospitals and other off-campus locations.

Some of our campuses are also using ITFS to help military personnel and employees of major corporations including Boeing, Raytheon, and Hewlett Packard, to upgrade their skills and keep pace with the demands of an increasingly technology-dependent workforce. Attached please find summaries of the ITFS services provided by three California State University campuses: CSU, Sacramento, CSU, Long Beach, and CSU, Fullerton.

Chairman Powell, on behalf of the 23-campus California State University system, I ask you to ensure that the 2500-2690 MHz band is preserved for instructional programming.

With kind regards,

Sincerely,

Charles B. Reed  
Chancellor

CBR/bab

Attachments

cc: Honorable Susan Ness, Commissioner  
Honorable Gloria Tristani, Commissioner  
Honorable Harold Furchgott-Roth, Commissioner  
Ms. Magalie Roman Salas, Secretary