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RICHARDSON INSTRUCTIONAL TELEVISION CENTER

Richardson Independent School District
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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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In the Matter of

Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz For Mobile and Fixed Services to Support The Introduction of New Advanced Wireless Services, including Third Generation Wireless Systems	)	ET Docket No. 00-258
Petition for Rulemaking of the Cellular Telecommunications Industry Association Concerning Implementation of WRC-2000; Review of Spectrum and Regulatory Requirements for IMT-2000	)	RM-9920
Amendment of the U.S. Table of Frequency Allocations to Designate the 2500-2520/ 2670-2690 MHz Frequency Bands for the Mobile Satellite Sevice	)	RM-9911

To: The Commission

COMMENTS

Richardson Independent School District submits these comments in response to the Notice of Proposed Rule Making and Order in the captioned proceeding,

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FCC 00-455 (released January 5, 2001) ("NPRM"). The NPRM explores the possibility of introducing new advanced mobile and fixed services (including Third Generation mobile services, or "3G") in various frequency bands, including 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").

Richardson Independent School District urges strongly that the FCC's introduction of new cell phone services cannot and must not be accomplished at the expense of ITFS and MMDS allocations in the 2500-2690 MHz band. Preservation of these ITFS and MMDS allocations are necessary both for the continuation of pervasive and invaluable licensed uses by incumbent stations in these services and the expanding rollout of advanced wireless broadband services to schools, homes and businesses. Richardson Independent School District believes that the Commission has identified, and can make available, other spectrum to satisfy demand for 3G mobile, without any incursion into the 2500-2690 MHz band.

Richardson Independent School District uses six ITFS channels to broadcast about eleven hours of programming a day to 54,408 students in 25 school districts and private schools, and at total of 104 campus locations. The schools within the regional area vary in size from thousands of students to 100 students and include the wealthiest and poorest schools in the State. The schools are located in metropolitan areas and in rural communities. Programming includes K-12 curriculum-based programs correlated to the state curriculum standards called TEKS or Texas Essential Knowledge and Skills. Students in rural communities take interactive high school credit courses in French, Latin, German I and II, AP Psychology, music theory, and sociology. These courses are not available on their campuses because of lack of certified teachers or low student enrollment. Instructional television provides equity and efficiency to students in the eight-county regional area served by Richardson Instructional Television (RITV). RITV also produces and broadcasts elementary Spanish instruction for grades 1-6 to approximately 5,000 students. Other programming includes live electronic field trips, and staff development and adult education. In the evenings, Dallas Community College District uses Richardson ISD capacity to broadcast college courses. The ITFS signal is also transported to several cable headends for cable franchises to distribute in the communities and schools.

Richardson Independent School District opposes the reallocation of the 2500-2690 MHz bands for 3G services on a number of grounds. First, ITFS and MMDS licensees have been using the band for many years to provide valuable educational services to students and teachers. There are more than 1,200 licensees across the country holding over 2000 licenses, serving K-12 schools, universities, community colleges, and governmental agencies and institutions. These licensees reach hundreds of thousands or millions of students and

adult/workforce learners, principally through video programming and other related services. These services cannot be sacrificed for more sophisticated cell phones.

Recent developments in technology have made it possible for ITFS and MMDS stations to provide high-speed, two way wireless data transmission services, including for broadband Internet access. These technological innovations are particularly timely given the explosion in online education which increasingly requires broadband access to rich-media content. Wireless broadband in the 2500-2690 MHz band utilizing ITFS and MMDS channels is fast enough to support broad range of such content, including two-way real-time video, streaming video, and other bandwidth intensive applications necessary for effective distance learning. In addition, wireless broadband provides the capability for educational institutions to build wide area networks at a reasonable cost. Educators are just beginning to realize the enormous potential of this technology. A significant number of stations are already being used for these purposes, hundreds of ITFS and MMDS licensees have applied for licenses to provide two-way service as of August, 2000, and many more are expected to apply when the opportunity arises again within the next several months.

In addition, ITFS educational licensees have become valuable "partners" of wireless communications companies through the practice of leasing capacity, or network sharing, which the FCC first allowed in 1983. The commercial counterpart of ITFS, MMDS has provided a variety of transmission services to communities around the country. Because MMDS licensees only have a limited amount of bandwidth, many ITFS licensees have joined with them to create shared networks essentially allowing ITFS systems to be deployed and operated at the expense of the commercial partner while generating additional funds for schools to use in developing their distance learning programs. The FCC has strongly encouraged this practice. However, if the FCC now takes channels away from these providers to make room for 3G services, the advantages of this public/private, educational/commercial collaboration will be lost.

Finally, the new ITFS/MMDS broadband wireless services are critical to bridging the digital divide—the chasm between those in the United States that have access to broadband Internet offerings and those that do not. The benefits of high-speed Internet access do not reach most Americans. DSL and cable modem services are primarily serving new, affluent, suburban neighborhoods, leaving inner cities, rural areas, and various other insular communities behind. However, with the highly favorable signal transmission and reception range of stations operating in the 2500-2690 MHz band, ITFS/MMDS stations can reach rural areas, inner-city neighborhoods, Indian reservations, and other underserved communities that cable modems and DSL cannot or will not serve. Thus, only wireless broadband— provided through ITFS and MMDS in the 2500-2690 MHz band— has the power to bridge the digital divide. If the FCC reallocates all or part of the

ITFS/MMDS spectrum for 3G services, the capacity, usefulness, and value of the ITFS spectrum would be significantly diminished if not destroyed. Even if only part of the spectrum is taken, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality service and signal interference. Moreover, the deployment of wireless broadband services through ITFS/MMDS shared networks would be stopped in its tracks, and for many communities, the promise of high-speed advanced services—either at all or at any reasonable price—would remain beyond reach.

For all these reasons, Richardson Independent School District opposes any reallocation of channels in the 2500-2690 MHz band from ITFS and MMDS, and urges the FCC to move mobile services into other available spectrum.

Respectfully submitted,
Carolyn Burrow

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Date: 02/20/01

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