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American Association of School Administrators

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 21, 2001

Federal Communications Commission
Magalie Roman Salas
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 00-258
Proposed Rule Making for the Allocation of Spectrum Space for 3G Technology

Dear Ms. Salas:

On behalf of the American Association of School Administrators, the professional association for the 14,400 school superintendents and the districts in which they work, we respectfully submit our comments on the proposed rule making for the allocation of spectrum space for 3G technology. Thank you for the opportunity to address some of the key issues.

AASA supports maintaining of 2500-2690 MHz for the sole use of the Instructional Television Fixed Service (ITFS) license holders and their Multichannel Multipoint Distribution Service (MMDS) partners. Approximately 1,050 licenses are held by 750 K-12 institutions across the United States, with several K-12 institutions holding more than one license. With the addition of the parochial schools, institutions of higher education, local public television and state education departments who provide services to K-12 schools in their area, the number of affected public schools grows significantly. This issue affects more than just the 750 K-12 license holders. It affects the thousands of the school districts that are receiving education services through the ITFS licenses.

It is also crucial to maintain the spectrum for the thousands of schools that are able to receive services from the license holders. Educational content delivered through ITFS is increasing around the country. Schools districts use ITFS licenses to improve educational quality. Examples include professional development, distance learning and wireless broadband. Through the recently authorized uses of the ITFS licenses, technology use in education is being raised to a higher level.

We commend the November 15, 2000 FCC Interim Report, which highlights the existence of symbiotic relationships between the commercial partners and the licensees. These are the same relationships that were encouraged by the FCC in the beginning of the 1980's. Public school license holders are just one part of that symbiotic relationship that increases the technological capacity of their own licenses. The cost of technology development is often greater than what schools can afford. To overcome this obstacle, school districts have been partnering with

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commercial entities such as Sprint or World Com, in exchange for actual hardware and money to develop the uses of the ITFS license or licenses. These shared networks are allowing ITFS license holders to acquire the latest technology with the help of their commercial partners.

AASA would like to reiterate the necessity of local control and decision making in deciding how the licenses will best be used by the local school district. Without authority over the spectrum, local licensees would no longer be able to ensure that their schools are able to update their system with the latest technology. More importantly, local license holders are able to decipher the demand for educational programming and determine the necessary resources for both themselves and the other districts within the spectrum range.

> *The Palm Beach County School District (FL) provides a good example of effective use of the ITFS license. The Palm Beach Board of Education currently owns 6 licenses that serve more than 154,000 students at approximately 143 school sites. They operate 11 channels over 3 bands and offer a wealth of services for all students within the district. In the past, the Palm Beach County School District has used its system to provide distance learning and to partner with higher education institutions to provide dual enrollment and Advanced Placement courses. They have offered satellite conferencing with the U.S. Department of Education and surrounding districts. Specifically, a local nature center is preparing to provide direct programming to elementary schools on the far side of the city when students are unable to come to the nature center.*
>
> *One of their most surprising benefits we heard of has to do with schools being designated as emergency shelters. In their local emergency disaster plan, the Palm Beach County School District has been able to deploy commercial television into the schools serving as shelters, providing families with up-to-date information on the current situation. This system has already been used during several hurricanes.*
>
> *Palm Beach is currently in the process of transferring its system for two-way digital access. Working with Sprint, Palm Beach will be able to provide wireless internet access to all of the schools within the district. This will increase the opportunity for interactive web-streaming activities and open up new avenues to distance learning opportunities. The ultimate value of the ITFS license does not rest solely with what the licensees are currently doing but what they are planning for the immediate future.*

The ITFS licenses have become a critical tool for equal access to resources for all schools. If the FCC reallocates all or part of the ITFS spectrum for 3G services, the capacity, usefulness and value of the ITFS spectrum would be significantly and unacceptably diminished, if not destroyed. ITFS licensees are working to bridge the "digital divide" that often confronts our schools.

With nearly two-thirds of all school districts designated, as rural special attention must be given to these public entities. Rural school districts are fighting to overcome the "digital divide" by finding new ways to gain internet access. Deploying fiber into rural areas is an expensive proposition costing thousands of dollars for each rural district, often much more expensive than a rural school can afford. ITFS provides the opportunity to serve these rural areas through wireless internet. Once internet access reaches a rural area, the prospects are limitless. Without wireless broadband internet service that ITFS can provide, high-speed broadband internet access is almost

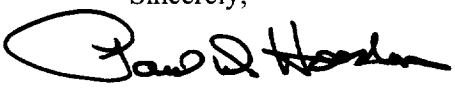
impossible to receive from DSL or cable providers because of the lack of population density compared with the overall cost.

> *The East Dubuque Community School District in East Dubuque, IL, a K-12 school district with 700 students, is a good example of bridging the "digital divide". This rural district has wireless internet access. The district provides internet access to families of the children they serve. Each student has been given a small handheld computer that accesses the wireless system. This allows parents without internet access in their home to email their child's teacher. Students now have access to library resource materials and homework assignments at home. This school district is working toward the next level of access to education, by bringing education directly into the home.*

If the ITFS licenses are taken away or relocated to another part of the spectrum, the work that has already gone into the transformation of this part of the spectrum will be lost. School district's technology plans would be set back years and everyone would have to go back to the drawing board. Rural schools would be left with no opportunities for distance learning, professional development or internet access and the "digital divide" will widen.

For all of these reasons, the American Association of School Administrators opposes the reallocation of all or even some of the ITFS and MMDS channels in the 2500 – 2690 MHz band and urges the FCC to move the 3G mobile services into other available spectrums. Thank you for the opportunity to submit our comments on behalf of our members.

Sincerely,



Paul D. Houston
Executive Director
American Association of School Administrators