

DUTCHESS

COMMUNITY COLLEGE

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Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12 12th Street, S.W.
Washington, DC 20554

Dear Secretary Salas:

As an ITFS licensee, Dutchess Community College respectfully submits the following comments in opposition to the proposed allocation changes in the radio spectrum presently occupied by the ITFS service. The College has been using its ITFS channels to deliver video programming to remote educational sites for the last ten years. Before using ITFS, the College's service to these remote sites was essentially a one-way delivery method of instruction. As technology has advanced and became more digital in nature it became apparent that this one-way model of delivery was obsolete. Educators and MDS operators asked to modernize the ITFS and adjacent MDS bands to permit digital service. Just recently the Commission authorized two-way digital service in this band, and the College has an application pending. This new service will allow fully interactive distance learning instruction to take place, as well as extend our computer network to these remote sites.

We were dismayed to learn of the proposed use of this spectrum by the cellular phone industry, which will preclude our continued use. This action occurs at a time when new instructional paradigms have yet to be fully developed and nurtured for digital ITFS service. It would seem that the Commission has just given education institutions a powerful method for reaching out to remote areas, only to yank it away to feed the insatiable appetite of a commercial interest. What happened to the concept of setting aside portions of the spectrum for education use?

We adamantly oppose the planned change in use of the current ITFS band. If, however, this change is made, we ask that a suitable new spectrum be made available to educational institutions and that the cellular industry pay to relocate current users to that new spectrum.

Sincerely,



D. David Conklin
President

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