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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 Service	)	RM-9911

To: The Commission

COMMENTS

The Superintendent of Huntsville City Schools submits these comments in response to the *Notice of Proposed Rule Making and Order* in the captioned proceeding, 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").

The Superintendent of Huntsville City Schools urges strongly that the FCC's introduction of new cell phone services cannot and must not be accomplished at the expense of ITFS

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allocations in the 2500-2690 MHz band. Preservation of these ITFS 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 and educators. The Huntsville City School System 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.

The Huntsville City School's ETV Center, (KHU-75), has four ITFS closed-circuit channels that broadcast up to twenty hours of educational programming per day to our students. Subjects include reading, language, arts, math, science, technology, history, and current events. In addition, ETV provides satellite downlink services for teachers who wish to take part in electronic field trips or distance learning activities. Other services include staff development programs and updates from our superintendent. Our channels also allow ETV to broadcast our monthly school board meetings to the community through local cable television.

The Superintendent of Huntsville City Schools opposes the reallocation of the 2500--2690 MHz bands for 3G services on a number of grounds. First, ITFS 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 of students, 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 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 channels is fast enough to support a 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.

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 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.

For all these reasons, The Superintendent of Huntsville City Schools opposes any reallocation of channels in the 2500-2690 MHz band from ITFS and urges the FCC to move 3G mobile services into other available spectrum.

Respectfully submitted,

The Superintendent of Huntsville City Schools

Huntsville, Alabama

call sign KHU-75

By: Mary Ruth Yates

Title: Interim Superintendent

Date: 7/21/01