SAN DIEGO COUNTY OFFICE OF EDUCATION

6401 LINDA VISTA ROAD, SAN DIEGO, CALIFORNIA 92111-7399 (858) 292-3500

Superintendent of Schools
Rudy M. Castruita, Ed.D.

COVER SHEET FOR COMMENTS:

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Proceeding: DK#00-258, RM-9920, RM-9911

Mail Correspondence to:
DOW, LOHNES, & ALBERTSON
Todd Gray, Attorney at Law
1200 New Hampshire Ave., N.W., Suite 800
Washington DC 20036-6802
(202) 776-2000

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Mailing Address For Correspondence: As noted on Letterhead

Email Address: bbracisz@sdcoe.k12.ca.us

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Nick Aguilar Ernie Dronenburg Susen Fay Jim Kelly John Witt

SERVICE AND LEADERSHIP

Before the
FEDERALCOMMUNICATIONSCOMMISSION
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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
Amendments of the U.S. Table of Frequency Allocations to Designate the 2500-2520/ 2670-2690 MHz Frequency Bands for the Mobile-SatelliteService	)	RM-9911

To: The Commission

COMMENTS

The San Diego County Superintendent of Schools submits these comments in response to the Notice of Public Rule Making and Order in the captioned proceedings, FCC 00-455 (released January 5, 2001) ("NPRM".) The NPRM explores the possibility of introducing new advanced mobile fixed services (including Third Generation mobile services, or 3G) in various frequency bands, including the 2500-2650 MHz band currently allocated for and used by stations operating the Instructional Television Fixed Service ("ITFS") and the Multichannel Multipoint Distribution Service ("MMDS".)

The San Diego County Office of Education on behalf of 480,000 students strongly urges that the FCC's introduction of new cell phone service must not be accomplished at the expense of our ITFS allocations in the 2500-2650 MHz band. This ITFS allocation includes 11 channels, A1-4, C1-4, and F1-3 (Call Signs: WBS-375, WDD-752, WCX-487.)

In addition, our San Diego County ITFS partners (San Diego State University, Palomar Community College, San Diego Community College District, Vista Unified School District,

Oceanside Unified School District, Escondido Union School District) hold licenses for 28 ITFS channels.

It is important to note that each of the County's ITFS entities have been in an excess capacity lease agreement with WorldCom Broadband Solutions for several years and are in the process of building a wireless broadband network for this region. These agreements have led to millions of dollars (almost $10 million since 1997) to these educational agencies to upgrade and improve instructional programs. Plans are underway to complete a 24-channel digital television network to be launched in Fall 2001. WBS plans on offering high-speed data and Internet services in the area by the end of 2001.

It is obvious from this circumstance that any reallocation of ITFS spectrum in this region would jeopardize thousands of hours of educational programs to hundreds of thousands of students and cost millions of dollars to accommodate infrastructure changes to redesign this exemplary network.

The San Diego County Office of Education's ITFS Channels:
Providing Educators and the Community with Valuable Broadcasting

San Diego County boasts one of the fastest growing and diverse economies in the nation. Home to one of the highest concentrations of High Technology and Bio Tech companies in the world, the need for quality educational resources has never been higher. The San Diego County Office of Education (SDCOE) oversees 42 school districts, 590 public schools that serve over 480,000 students from a population of 2.6 million.

The San Diego County Office of Education's (SDCOE) instructional channels have provided almost 600 schools and 1 million homes with instructional programming for more than two decades. SDCOE broadcasts more than 15,000 hours annually of valuable instructional programs and distance learning courses throughout San Diego County. Regularly scheduled daily programming includes vital instruction for grades Kindergarten through 12. The SDCOE office purchases and broadcasts over $100,000 of programming annually to enhance instruction in both metropolitan and remote schools alike. Schools where it is not feasible to hire specialized instructors, utilize advanced science, test-taking skills, languages, geography, and art programs to supplement their curriculum. Programs that connect curriculum to current events, such as live science expeditions, CNN Newsroom for schools, and local environmental programs are also utilized to enhance instruction.

- Instructional Television/ITV's MathVision program is an example of the type of valuable programming we provide with a high level of community participation. MathVision is an award-winning television homework helpline primarily for 6th through 9th grade students. It is a live program that airs after school hours and invites students to call in their math homework problem to receive television tutoring. The program receives an average of 2,500 calls per month from all over San Diego County.

- TEAMS, STARNET, MCET are national distance learning providers that use San Diego's ITFS spectrum to transmit instructional television programs to almost 500 local schools and thousands of San Diego County students.

- JASON Project is a live two-week electronic field trip to important research sites (rainforest, volcanoes, deep sea/ocean, etc.) that matches scientist with students from around the world. These satellite and on-line distance learning programs involve more than 2,000 students in San Diego County.

  Founded in 1989 by oceanographer and discoverer of the *RMS Titantic*, Dr. Robert Ballard, the JASON Project is a supplemental science, geography and environmental education program tailored for students in grades 4 through 9 and their teachers. The Project integrates a year-long expedition, a curriculum annually endorsed by the National Science Teachers Association, supplemental video programming, an award winning web site and leading-edge educational broadcast technologies to bring the excitement of science and exploration alive for students.

- College credit courses are broadcast through ITV's partnership with Intelecom, a consortium of 26 community colleges, Palomar and San Diego Community Colleges providing an average of 20 telecourses each semester to thousands of Southern California students.

- San Diego State University also utilizes our broadcast network for telecourses for teacher credentials each year. Adult education and GED courses provide needed instruction for the community as regular programming on ITV.

- Licensed Instructional Television Series include: What's in the News, Eureka, Art Chest, Club Write, Tracks, Futures II, GED, Writer to Writer, and Return to the Sea. The programs are broadcast on ITV's educational cable channel and ITFS to schools and homes in San Diego County.

SDCOE's four ITFS channels enable ITV to broadcast special programs from satellite downlinks for administrators, teachers and parents.

- ITV receives dozens of requests a month to downlink and broadcast events. The National Association of State Directors for Special Education training series, U. S. Department of Education's monthly Satellite Town Meetings, Multijurasdictional Counterdrug Task Force Training, California Department of Education special policy informational videoconferences, and recently for parents and counselors a Federal Student Aid Videoconference.

The above noted programs could not be viewed by the San Diego educational community without ITV's ITFS broadcast.

Viewership research conducted in 1996 indicated that ITV programs were rated high in quality and value to students and community members. The use of instructional television programs continues to expand and has become an integral part of the delivery of education to hundreds of thousands of students, teachers, parents, and the community.

All of this would not be possible without ITFS broadcast capabilities.

NEGATIVE IMPACT OF REALLOCATION OF ITFS SPECTRUM

Moving ITFS to another part of the spectrum would have a devastating effect on the quantity and quality of instructional TV programming currently being offered in San Diego County. In addition, a reallocation of ITFS spectrum would have substantial implication on local budgets and revenue streams that support educational programs. It is estimated that it would cost approximately $1.15 million to accommodate a change in spectrum allocation for transmitters, receivers, and related equipment for 600 schools.

San Diego County ITFS partners have significant excess lease capacity agreements with WorldCom Broadband Solutions that are at critical stages of building-out the two-way broadband system. More than half of the 600 schools and two transmission sites have been converted to the digital network. Any changes or delays in this operation would interrupt lease arrangements and the millions of dollars these contracts represent.

A reallocation of ITFS spectrum would jeopardize thousands of instructional programs for teachers, students, and their communities, as well as eliminate a source of financial resources necessary for schools to keep pace with technological progress.

If the FCC reallocates ITFS/MMDS spectrum for 3G services, the capacity, educational value and potential of ITFS spectrum would be significantly and unacceptably diminished if not destroyed. In addition, the deployment of fixed broadband services through ITFS/MMDS would be altered and would result in the loss of millions of dollars of investment and the opportunity for high speed advanced services.

For all these reasons, the San Diego County Office of Education opposes any reallocation of channels in the 2500-2650 MHz band from ITFS and MMDS, and urges the FCC to move 3G mobile services into other available spectrum.

Respectfully submitted,

Rudy M. Castruita, Ed.D.
San Diego County Superintendent of Schools

Date: February 21, 2001