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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 13, 2001

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Chairman Powell
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Dear Chairman Powell:

I am concerned about the future of the ITFS spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. ITFS is an important part of the educational program in our service area. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only for our students but also for our entire community.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband will compliment our DSL technology by making broadband access more widely available and affordable. We have applied for the two-way licenses and plan to utilize them to provide fixed wireless broadband services to our rural customers that we cannot reach with DSL. This is the only method by which we can provide broadband services to these remote locations at an affordable rate.

ITFS does not only benefit schools, students and adult learners, however. In addition to the broad range of community programming currently carried on ITFS spectrum, the recent two-way order filled a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans.

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Working in conjunction with wireless communications companies, ITFS spectrum is being used to bring broadband to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. In either scenario, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community and to underserved communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. We at the Central Dakota TV hope that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

Keith A. Larson, CPA
CEO/General Manager

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