ORIGINAL

00-258

Governors State University

Center for Extended Learning

Charles Nolley, Director
Communications Services
(708) 235 3975

EX PARTE OR LATE FILED

RECEIVED

FEB 27 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Chairman Powell
Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Tristani
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911

February 18, 2001

Dear Commissioners:

Governors State University received license for two ITFS channels in 1992. Since that time these channels are in constant use and play an important role in the delivery of distance education to our students. One channel is programmed 24/7 with instructional and educational programming. This programming can be picked up at receive sites throughout our service area. It is also the means to transmit this signal to the AT&T cable, which carries this signal to some 17 communities in our area.

For many years, GSU has been an innnovator and leader in the development of educational television and distance learning. A number of our telecourses are in use nationwide through distribution arrangements with PBS's Adult Learning Service and other outlets. However, ITFS is the vital link that allows us to deliver these courses into the homes of our students. We typically broadcast about twenty different GSU courses each term and we also broadcast a schedule of courses for Prairie State College. The number of students enrolled in these courses ranges upwards of 1,000 at a time, however the actual impact is much broader. We constantly hear stories from members of the community who are watching these programs and learning from them, though they are not enrolled in the courses for credit. It is difficult to precisely quantify this secondary impact of these channels but it is clear that this is a valuable educational resource in the community that reaches many thousands of people besides those who formally enroll. Who are these students? The over predominantly minorities and women, averaging over 30 years old, dealing with the struggles of work and children while struggling to complete the higher education degrees that will allow them to secure a better life for themselves and their children. They are highly motivated but face great difficulties in attending classes on campus. Furthermore, many do not have adequate access to the Internet and the ITFS delivery of high quality instructional television fills a vital function in providing them access to quality, affordable education.

Our second channel is used for a variety of educational purposes. We make extensive use of our satellite facilities to bring in programming to GSU and we provide

No. of Copies rec'd 0
List A B C D E

services to area elementary and secondary schools by sending them educational programs including NASA programs that are used in the science curriculum. Special events such as regional election debates, regional planning discussions, and national programming of local interest are also broadcast. Using a state grant from the Higher Education Cooperation Act (HECA), we developed the TecTrain program, which uses ITFS to provide access to a wide variety of training programs for companies and their employees throughout our areas. We currently have 28 sites participating in this program. This second channel has also been valuable to us an additional tool to use in staging teleconferences and was employed in a national teleconference we recently produced on the subject of school violence.

It should be further noted that through the use of ITFS, we are able to provide the only real locally originated educational programming available to the communities in our region. This is an area that is underserved by other media outlets and so the role of ITFS in helping us reach both specific targeted locations and the general population in our area with 24 hour educational programming is a highly valued community service. It should be emphasised that ITFS is a critical enabling technology and without it, we would have no capacity to reach anyone in our area with these courses and programming. Finally, the students who benefit most from this broadcast link are some of the most deserving and needy people in the area and they should not lose this vital point of access to quality higher education.

For over a year, we have been exploring the possibilities for using wireless broadband technology to deliver courses to our students. This is an area that stands to benefit greatly from this technology, as wired broadband may be a long time coming. At the same time, we have launched a large development project, with a $1.33 million LAAP grant from the Fund for the Improvement of Post-Seconday Education in the U.S. Department of Education to develop some innovative new approaches to distance learning that combine the power of instructional television with the interactive capacities of the Internet. The materials being developed are for the training of foster parents nation-wide and are targeted for eventual broadband delivery. One of the greatest needs is in more rural areas. It is our plan to extend this development for ITFS broadband delivery in our area and very likely in many other areas as well. This shows great promise as a very advanced system for anytime anyplace education in an age where lifelong learning is becoming the norm and more and more students must seek alternatives to traditional classroom instruction.

In summary then, Governors State University is presently using its present analog ITFS channels at a very high level to play an important role in the delivery of distance education to an underserved population and has well conceived plans already in process to convert to digital delivery in a way that will sustain our current delivery options while opening up an advanced interactive delivery method for sophisticated course material that we are currently developing in a major three year project with the LAAP grant. At GSU, ITFS is fulfilling its promise as an important vehicle for education in the community and there are compelling reasons to see that it continues to do so.

We are 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 our educational program at Governors State University. 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. We at Governors State University hope that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely yours,

Charles Nolley
Director, Communications Services
Governors State University

Licensee: WLX-476
File Number: BPLIF-860115DI