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Sandhills COMMUNITY COLLEGE

Office of the President

February 14, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

00-221

Ms Diane Cornell, Associate Chief
Wireless Telecommunications Bureau
Room 3-C220
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

ORIGINAL

Dear Associate Chief Cornell:

It has come to our attention that educational use of the Instructional Television Fixed Service (ITFS) spectrum is under threat of being fatally weakened by the Commission's Notice of Proposed Rule Making on 3G spectrum allocations (released 5 January, 2001). If we understand this threat correctly, frequencies that we and other educational institutions have pursued for educational programming now stand the possibility of being handed over to the telecoms for third-generation or 3G services. Should this possibility come to pass, commercial cell-phone company use will make this spectrum virtually useless for educational purposes.

As you may imagine, we in North Carolina education are both puzzled and alarmed by the possibility that all of our working and planning may lead to nothing more than more bandwidth for cell phones. We are alarmed at the possibility that the surrendering of our bandwidth to 3G will mean an end to our attempt to bridge the digital divide in our state. Here in North Carolina we have a population that is irrevocably split between urban and rural. At my college, we serve one county that is generally wealthy and an adjoining county that is rural, the poorest in the state. Were our ITFS access to be denied, the college will be unable to meet the educational needs of the citizens of that county.

We in North Carolina have worked for years to prepare licensing applications, locate transmitters, resolve application issues and interface problems, and build partnerships and consortiums in order to be ready to use ITFS bandwidth to carry education and training to areas otherwise locked out of these benefits.

The education and workforce preparation needs of our state and the country do not allow for us to provide these services through commercial means. It is critical to the realization of our mission that we be allowed to pursue the path struck early in 1995. Five years of difficult, demanding, and complex planning should not arbitrarily be

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set aside in order that a third generation of mobile/handheld devices be given educational bandwidth for non-educational purposes.

We realize that you face your own set of difficult, demanding, and complex problems. But we ask that you factor in the needs and obligations of colleges, universities, and school systems across the country. We ask that you make the decision that speaks to the educational and economic good of the most of the people that you serve.

To contribute to your reflections, we attach our utilization plan for the Rockingham (North Carolina) market which includes our college along with Richmond Community College and Central Carolina Community College. This plan will demonstrate our planned use of the ITFS bandwidth.

Presidents of local area community colleges and the superintendents of our local area school systems join me in asking for your consideration of this important matter.

Sincerely,

John R. Dempsey
President

ITFS UTILIZATION PLAN

ROCKINGHAM MARKET

Central Carolina Community College

Richmond Community College

Sandhills Community College

CCCC projects a total of 12 sites with multiple rooms at each site. Additional capacity will be needed if Harnett and Chatham counties are included.

Electronic Mail	5,500+
Video on Demand	200+ hours per month per room
Streaming Video	200+ hours per month per room
Web Access	14 hours per day x 1500 PCs x 22 days = 442,000 hours/month
Phone Service	24 hours per day x 30 days x 400 users
ITV	200+ hours per month for 3 rooms

RCC projects access needs at 3 sites.

Rockingham Center: (Continuing Education)

Web Access – 14 hours per day x 30 x 22 days = 9240 hours per month

Email for faculty, staff and students

James Nursing –Hamlet (Curriculum)

Web Access – 8 hours per day x 20 x 22 days = 3520 hours per month

Email for faculty, staff and students

Scotland Center –Laurinburg: (Continuing Education)

Web Access – 14 hours per day x 40 x 22 days = 1220 hours per month

Email for faculty, staff and students

SCC projects access needs at seven sites.

Robbins site: (Continuing Education)

Web access - 14 hours per day X 30 PCs X 22 days = 9,240 hours per month

Phone access - 24 hours per day X 30 days X 3 users = 2,160 hours per month

Video - 200 hours per month for 3 classrooms = 600 hours

Email use for faculty, staff and students = approximately 300 students, 15 faculty and staff

Hoke site: (Continuing Education)
Web access - 14 hours per day X 75 PCs X 22 days = 23,100 hours per month

Phone access - 8 lines X 24 hours per day X 6 users = 1,152 hours per month

Email use for 1,000 students

Video - 200 hours per month per 3 classrooms = 600 hours per month

The additional sites would use an estimated 960 hours each per semester for video conferencing and high resolution video. We also expect UNC-Pembroke to use 144 hours per semester to deliver classes to the SCC campus.