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

February 2, 2001

Dear Ms. Cornell:

This is written to express the deep concern of the University of Maryland relative to the FCC recently issued Notice of Proposed Rule Making RM-9920 9911 (NPRM). This notice seeks comments on the proposed reallocation of certain frequency bands for the introduction of advanced 3rd Generation (3G) wireless services. One of the frequency bands being considered in the NPRM is the ITFS band (2500-2690 MHZ). Since 1963 this frequency band has been allocated for educational use by the FCC, and it is being used by schools and colleges nationwide to broadcast educational material.

For 21 years the University of Maryland, Instructional Television System (ITV) has been broadcasting courses over the ITFS frequencies in engineering, computer science and management to student employees in companies and government organizations all over the state of Maryland, particularly in the Baltimore and Washington metropolitan areas. In addition many of these courses are broadcast over the National Technological University network by satellite to students all over the United States. Each year more than 1,000 students receive University of Maryland credit for these ITV courses and more than 2,000 students take non-credit courses. Given that there is no suitable replacement spectrum for ITFS, if it is decided that the ITFS frequencies should be allocated for 3G wireless use, it is quite probable that the University of Maryland ITV system will be forced to cease operations and end our service to the ITV students.

Reallocating the ITFS frequencies would also do away with the benefits accruing from the recent FCC ruling permitting the use of ITFS frequencies for high-speed two-way internet access. To provide this access WorldCom Wireless Solution, Inc. (WorldCom) has leased from the University excess channel capacity on the University's ITFS channels. WorldCom will use this excess capacity for a high-speed two-way internet access system which would serve citizens in the Baltimore and Washington

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metropolitan areas. In exchange for the use of the excess channel capacity WorldCom will digitize the University's ITV system so that the University will have double the capacity that it presently has, and will provide the University of Maryland with royalties. Doubling the capacity and having the royalties will greatly enhance the capability of the University of Maryland to offer courses. Neither the enhancement of the University of Maryland ITV system, nor the benefits of the high-speed two-way internet access system would occur if the ITFS frequencies were reallocated.

Continuation of our educational transmissions is an important educational issue for the University of Maryland. It is also important for the University, in partnership with WorldCom, to provide broadband wireless internet access, to finally bring service to areas that do not have available cable modem or DSL lines, and to bring competition to those areas that have cable or DSL Internet access.

For the above reasons the University of Maryland strongly urges the FCC not to reallocate the ITFS frequencies for 3G wireless use.

I thank you for your attention to this matter.

Sincerely,

Arnold Seigel

Dr. Arnold Seigel
Director