ORIGINAL

Wayne Community College

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February 15, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Julius Knapp, Chief
Policy and Rules Division
Office of Engineering and Technology
Room 7-B133
445 12th Street, SW
Washington, DC 20554

Dear Chief Knapp:

I am concerned about the future of our educational spectrum of broadband frequencies commonly referred to as Instructional Television Fixed Service (ITFS). As you know, the Federal Communications Commission has issued a Notice of Proposed Rule Making (ET Docket No. 00-258, RM-9920 and 1911) seeking comments on a plan to relinquish ITFS channels to cellular phone companies for third generation (3G) mobile telephone services. The loss of these channels and frequencies would deprive Wayne Community College and hundreds of other educational institutions and the communities they serve of an irreplaceable resource. ITFS is an important part of Wayne Community College's educational plan. Moreover, these frequencies are absolutely critical if wireless broadband is to become a reality for our students and our 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 model of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. The FCC's decision to allow two-way Internet access has provided opportunities for Wayne Community College to expand its distance learning offerings in ways not possible only a few months ago. Our planning objectives for the next five years require the use of ITFS frequencies for multiple distance learning course offerings. The attached Excel spreadsheet shows excerpts from our Utilization Plan with indications of the amount of bandwidth needed for individual classes. Many of the web-based classes are being offered currently through wired Internet services. However, as distance learning classes become more interactive and more abundant, we will require cost-effective broadband services made possible through ITFS frequencies. Our ITFS license will allow us to serve our educational community by reaching students at Seymour Johnson Airforce Base, public schools, local government organizations, prison systems, and businesses and industries in our area. This technology will allow us to go to our students when they can't come to us.

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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, cutbacks, and lower quality of service. In either case, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community.

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

Sincerely,

Ed Wilson
President, Wayne Community College

Wayne Community College

Projected ITFS Utilization

This data represents one typical semester of classes based on current and projected Information. Most of these classes would be available by Fall Semester of 2003 if Our Wireless Frequencies were available to us. The need for wireless frequencies for Distance Learning classes as well as administrative operations is expected to increase aggressively in the next 3-7 years.

	Services				
	Estimated Participants	Traditional Estimated Contact Hours	Web Classes w/video and sound clips (56kb-1mb)	Interactive Video (400 kb-sec both direc.)	High Res. Video (768 kb-sec or higher continuous)
CURRICULUM					
AGR110-Ag Econ	25	48	X		
Turfgrass **(2 courses)**	50	96	X		
ANS160-Waste Management	25	48	X		
ECO251-Economics **(2 sections)**	50	96	X		
ECO252-Economics**(2 sections)**	50	96	X		
SPA111-Elementary Spanish I	25	48		X	
SPA112-Elementary Spanish II	25	48		X	
SPA211-Intermediate Spanish I	25	48		X	
SPA212-Intermediate Spanish II	25	48		X	
SPA120-Spanish for the Workplace	25	48		X	
FRE111-Elementary French I	25	48		X	
FRE112Elementary French II	25	48		X	
FRE211-Intermediate French I	25	48		X	
FRE212-Intermediate French II	25	48		X	
POL120-Political Science, other	25	48	X		
SAB Substance Abuse Curriculum **(9 courses)**	225	432	X		
GEO111-Geography	25	48	X		
GRO220-Gerontolgy	25	48	X		
GRO220-Psy/Soc Aspects of Aging	25	48	X		
GRO230-Health, wellness, and Nutrition	25	48	X		

	Services				
	Estimated Participants	Traditional Estimated Contact Hours	Web Classes w/video and sound clips (56kb-1mb)	Interactive Video (400 kb-sec both direc.)	High Res. Video (768 kb-sec or higher continuous)
Aviation Curriculum **(10 courses)**	250	2, 000		X	
Health Sciences/Med Tech **(5 courses)**	25	240	X		X
ART 111Art Appreciation	25	48	X		
Bus 110 Intro To Business	25	48	X		
CIS 110 Intro to Computers**(5 classes)**	125	240	X		
CIS 130 Survey of Operating Systems	25	48	X		
CIS 172 Intro to Internet**(2 classes)**	50	96	X		
ECO 251 Princ. of Microeconomics	25	48	X		
ENG 111 Expository Writing	25	48	X		
HIS 122 Western Civilization	25	48	X		
NET 110 Data Comm/Networking	25	48	X		
OST 131 Keyboarding	25	48	X		
OST 136 Word Processing	25	48	X		
OST 284 Emerging Technologies	25	48	X		
SOC 210 Intro to Sociology	25	48	X		
LIBRARY SERVICES					
Wayne Information Network		1200	X		
NC Live		1200	X		
CONTINUING EDUCATION					
Command Spanish **(39 courses)**	20	1560		X	
Nurse Aide I	25	144		X	
Aviation Weather	20	80		X	
Instrument Pilot	20	80		X	
Ground School - Pilot	20	80		X	
Intro. PC Troubleshooting	25	48		X	
Vital Learning Supervisory	15	45		X	
Fire Fighter I & II	100	384		X	
Health Unit Coord.	10	108	X		
Insurance Pre-licensing	20	75	X		
Child Care	20	30	X		
Horticulture	20	300	X		

Welding	20	44	X		
Light Construction	25	300		X	

	Services				
	Estimated Participants	Traditional Estimated Contact Hours	Web Classes w/video and sound clips (56kb-1mb)	Interactive Video (400 kb-sec both direc.)	High Res. Video (768 kb-sec or higher continuous)
Landscaping	20	70	X		
Wastewater Treatment	30	75	X		
Emergency Rescue Tech. (ERT)	100	270			X
Electrical Standard Insp. I, II, & III	15	36		X	
Building Standard Insp. I, II, & III	15	36		X	
Fire Standard Insp. I, II, & III	25	30		X	
Mechanical Standard Insp. I, II, & III	15	36		X	
Plumbing Standard Insp. I, II, & III	15	36		X	
Pharmacy Technician	25	108		X	
Substance Abuse	15	48		X	
Medical Terminology	10	60	X		
Sign Language	20	40		X	
Spreadsheet Design I & II	15	48	X		
Presentation Design I & II	15	48	X		
Teacher Re-Certification	40	120		X	
Courses To Go - Online Courses	60	48	X		
HIGH SCHOOL COURSES					
Spanish	20	60		X	
Intro. Adult High School/GED	40	20	X		
12 Core Courses (estimate each)	25	900		X	
Goldsboro High School	20	40		X	
Eastern Wayne High School	20	40		X	
Spring Creek High School	20	40			X
C. B. Aycock High School	20	40		X	
Rosewood High School	20	40		X	
Southern Wayne High School	20	40		X	
UNIVERSITY DEGREES					
East Carolina University	20	40			X
Mount Olive College	20	40		X	

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	Estimated Participants	Traditional Estimated Contact Hours	Web Classes w/video and sound clips (56kb-1mb)	Interactive Video (400 kb-sec both direc.)	High Res. Video (768 kb-sec or higher continuous)
PROFESSIONAL DEVELOPMENT					
Taxation	35	15	X		
Micro Enterprise	35	20		X	
Small Business Courses (Web Based)	20	30		X	
Small Business Courses (Interactive Video)	25	30			X
Small Business Incubator	20	30		X	
New and Expanding Industry	20	30		X	
Focused Industrial Training	20	30		X	
Faculty	35	18		X	
Staff	70	18		X	
ADMINISTRATION					
GroupWise Applications	250	2000	X		
Training for new computer applications for other Institutions	20	60		X	
STUDENT SERVICES					
Tutorial Services		unknown	X		
Admissions and registration		unknown	X		
Student Advising & counseling		unknown	X		
GOVERNMENT					
Prisons	100	480	X		
DART - Drug and Alcohol Rehabilitation Treatment Center	30	480	X		
County and City Employee Training	40	190	X		
MILITARY					
Seymour Johnson Air Force Base (Internet)	40	48	X		
SJAFB (Interactive video)	40	40		X	
Guard and Reserve Training	40	40		X	
Cherry Point NAS	40	40			X

	Services				
	Estimated Participants	Traditional Estimated Contact Hours	Web Classes w/video and sound clips (56kb-1mb)	Interactive Video (400 kb-sec both direc.)	High Res. Video (768 kb-sec or higher continuous)
OTHER					
English as a Second Language	40	47		X	
Study Test Taking Skills	40	6		X	
Job Readiness for Compensatory Ed.	15	25	X		
Healthy Living for Compensatory Ed.	15	25	X		
Community Service (Hobby)	20	30	X		
GED Prep.	50	50	X		
Taking Steps Toward College Ed. (HRD)	40	20	X		
Womens Self-Esteem	20	20	X		
Ethics for Inmates	15	30	X		
Life Choices/Dilemma	15	30	X		
Testing (GED and Other)	120	4	X		
INTER-CAMPUS CONNECTIVITY		Unknown	X		
TELEPHONY		Unknown	X		

X in columns D, E, F represent the preferred delivery method

D is defined as 56kb-1mb

E is defined as 400kb-sec in both directions

F is defined as 768kb-sec or higher continuous