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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 16, 2001

Dear Commissioners:

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 our educational program at the University of California at Davis. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only for our campus constituents 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 promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

As you are aware, California higher education institutions are bracing for a large influx of students over the next 10 years. At UC Davis, the impact is expected to boost our overall student population from 24,000 to 30,000. One of our strategic plans is to leverage our ITFS frequencies, once they become licensed for two-way digital transmission, to provide significant distance educational access to our growing student population. As UC Davis works to finance and construct new facilities to handle unprecedented growth, it will require a robust remote access technology that will allow us to extend the classroom to student residences to minimize the impact of growth on current campus facilities.

UC Davis must find growth solutions within the framework of the local community. The local community and landscape surrounding UCD creates unique challenges that can be addressed with wireless broadband remote access technology.

The benefits from ITFS deployments extend beyond 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 will fill a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless communications companies, ITFS spectrum will be used in our community to bring broadband to underserved populations in rural, urban and otherwise isolated communities in our area. 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 affected, UC Davis will lose some of its ITFS service altogether and 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 our faculty and students and to our underserved community.

We have heard about the "power of the internet" for 10 years, but have only seen glimpses of its educational prowess. The power is finally in the hands of those who can utilize it best for this country. The distribution channels of educational institutions from K-12 to the thousands of private and public universities is unmatched by any private concern. Now is not the time to impose the restrictions of corporate control. It is the time to reaffirm the FCC's commitment to the public network and the free distribution of information through our educational systems.

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

Sincerely,

David Klem

David Klem
Technology Development Officer