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NORTH CAROLINA COMMUNITY COLLEGE SYSTEM
H. Martin Lancaster, President

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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February 16, 2001

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

Dear Mr. Knapp:

I write in opposition to the proposal to reallocate the ITFS frequencies to commercial entities for the use of 3G devices. The January 19, 2001 edition of *The Chronicle of Higher Education* featured an article with the headline "Cell-Phone Technology Threatens to Devour Distance-Education Bandwidth." It began with a question that I paraphrase only slightly to bring it into the digital age: **Will educational information technologies be sacrificed on the altar of the next-generation cell phone?**

It has been suggested that the ITFS users could be relocated to other frequencies. There are three problems with that scenario. First, they would likely be inferior frequencies higher in the spectrum that would require more power to cover a given distance. Second, such a relocation would make worthless much of the work done by the N.C. Community College System and our private sector partner, Wireless One of North Carolina (WONC). Third, it would quite likely result in that partnership coming apart.

It is that third issues on which I would like to elaborate. WONC is owned on a 50% - 50% basis by WorldCom and CT Communications (CT), the later being a North Carolina company that has proven it can deliver quality telecommunication services to rural areas and still make a profit. All our dealings have been with CT, indicating that WorldCom has delegated negotiations to CT. We believe that the self-interests of CT coincide in most cases with the interests of the Community College System and the State of North Carolina. Further, from past dealings we know that the people at CT are people of integrity. They tell us that their business plan will simply not work if any part of the ITFS spectrum is taken away from us.

Having served four terms in the North Carolina House of Representatives, four terms in the U.S. Congress, and several years as Assistant Secretary of the Army, I am keenly aware that compromise always seems the fairest, the most civilized, and the most intuitive

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thing to do. However, in this case there is apparently no middle ground or room for compromise. We believe WONC when they tell us that the ITFS spectrum must remain intact for them to continue in this project. A member of my staff reports that this was a common theme at a meeting of the National ITFS Association held in Orlando in January.

I understand the rationale that forms the basis for considering reallocating the ITFS frequencies. For more than two decades they have been grossly under-utilized in the United States. There is a very simple explanation for this fact: Educational institutions and systems are almost always under-funded for new initiatives and services needed for unforeseen circumstances. The lease-back arrangement instituted by the Congress and the FCC has finally made it possible for the three educational systems in North Carolina to work toward a statewide wireless network. The N.C. Public School System, the N.C. Community College System, and the University of North Carolina System intend to utilize the network for cooperative courses and programs, providing for the citizens of the state a seamless web of educational opportunities for lifelong learning.

There are two North Carolinas! One is a prosperous and progressive urban and suburban North Carolina. The other is a struggling rural North Carolina rocked by natural disasters and an uncertain agricultural economy. The digital divide can be seen in stark relief in our state. Wireless technology is the fastest way to narrow and ultimately close the digital divide. A statewide wireless network would allow the three educational systems to provide economic development and workforce training, not just to rural areas, but also to the inner cities that are often impacted by the same forces and that need the same kind of assistance.

It would literally be a shame to deal a death blow to ITFS at a time when we are so close to utilizing the spectrum for the purpose intended by the Congress when it dedicated ITFS for educational purposes. Taking ITFS away from the educational community will not only deprive it of a needed resource, but will also have a demoralizing effect across the nation.

I respectfully ask that you preserve the ITFS spectrum for the purpose that was originally intended by the Congress and allocate other parts of the spectrum to 3-G.

With kindest regards, I am

Sincerely,

H. Martin Lancaster

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