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RANDOLPH COMMUNITY COLLEGE President's Office
PO Box 1009 Asheboro, NC 27204-1009 (336) 633-0286 FAX - (336) 633-0104

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February 20, 2001

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

ET Doc. No. 00-258
RECEIVED

MAR - 2 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chief Knapp:

Over the last five years, the North Carolina Community College System (NCCCS) and Wireless One of N.C. (WONC) have shared a vision to provide educational opportunities through Instructional Television Fixed Service (ITFS) to thousands of residents throughout the state. As part of the NCCCS, Randolph Community College has been an active participant in this effort to secure ITFS licenses. Randolph realizes the importance of a statewide wireless network that would expand our instructional services to include broadband two-way connectivity. A wireless network would serve not only community colleges, but would also reach out to public schools and public universities. Such a statewide network would enhance our instructional goals and embrace the rural community as well as the urban and suburban populations.

The NCCCS, its colleges, and WONC have dedicated numerous hours to achieve this vision. The commitment of all those involved reflect the importance of ITFS. With so much at stake for education across North Carolina, I am greatly concerned about the effort by 3-G (third generation of mobile/handheld devices) to acquire the licenses Randolph and other colleges have been working so hard to obtain. Their efforts are particularly troubling due to the fact that there are other frequencies available for 3-G's applications.

I have included Randolph Community College's utilization plan to share our vision for ITFS. I hope that the FCC will thoroughly examine the benefits that ITFS will offer the educational community in North Carolina, and through this examination, resolve to set aside licenses for our institutions.

Sincerely,

Richard T. Heckman, Ed.D.
President

RH/cth

Enclosure

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ENCLOSURE

**Randolph Community College
Projected ITFS Channel Usage**

Services	Peak Usage (proj.)	Hours of Peak Usage	Average Usage	Proposed Application	Number of Courses Utilizing Services	Programs Affected
Electronic Mail/Messaging	64 Kb/s	7:30 a.m - 10:30 p.m.	16 Kb/s	Instructional Communication	50%	CR, CE, HS, DG, PD, GV
Web Content	512 Kb/s	24 hours	128 Kb/s			
File Transfer	384 Kb/s	7:30 a.m - 10:30 p.m.	64 Kb/s	On-site Program and Instructional Support	20%	CR, CE, HS, DG, PD, GV
Video/ Audio content	3 Mb/s	7:30 a.m - 10:30 p.m.	512 Kb/s	Streaming Audio and Video	60%	CR, CE, HS, DG, PD, GV
Video Conferencing	5 Mb/s	7:30 a.m - 10:30 p.m.	1 Mb/s	Counseling/Distributed Instruction	30%	CR, CE, HS, DG, PD, GV
High Resolution Video	40 Mb/s	7:30 a.m - 10:30 p.m.	6 Mb/s	Media Distribution/Sharing	20%	CR, CE, HS, DG, PD, GV
Inter Campus Connectivity	40 Mb/s	7:30 a.m - 10:30 p.m.	10 Mb/s	Non-Internet Coursewares	50%	CR, CE, HS, DG, PD, GV
Inter Campus Voice Over IP	2.5 Mb/s	24 hours	256 Kb/s	Live Communication	75%	CR, CE, HS, DG, PD, GV
Total Usage (estimated)	110 Mb/s		20 Mb/s			

Programs:

- CR - Curriculum Courses
- CE - Continuing Education Courses
- HS - Huskins, Dual Enrollment Courses
- DG - Degree Programs
- PD - Professional Development
- GV - Government

*Submitted by
John Davis
Celia Hurley
January 29, 2001*