EDUCAUSE
Transforming Education Through Information Technologies

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February 16, 2001

Michael K. Powell, Chairman
Federal Communications Commission
445 12th Street SW, 8th Floor
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: FCC ET DOCKET 00-258; RM-9920; RM-9911
Rules to reallocate spectrum for Advanced Wireless Services

Dear Chairman Powell,

On behalf of EDUCAUSE, an international, nonprofit association representing over 1,800 colleges and universities seeking transformational change in higher education through information technologies, I write to oppose the proposed reallocation of the spectrum currently used for educational purposes.

EDUCAUSE members are concerned that the Commission is considering, yet again, repurposing the spectrum band that has traditionally been reserved for Instructional Television Fixed Service (ITFS) for third generation (3G) services. We stand with others of the education community in opposing this proposal.

While recognizing the growing demand for spectrum for mobile high-speed data and Internet-access wireless services, we urge the Commission to appreciate the role that ITFS licensees play in delivering critical educational services to schools, colleges and universities, and business communities across the nation. We believe that the short term advantages associated with the stimulation of third generation wireless services should not preclude serious consideration for longer-term public and educational interests. If the Commission must reallocate spectrum in order to promote additional commercial advanced wireless services, it should not do so at the expense of incumbent ITFS services.

For almost 40 years, ITFS has served the interests of both public and private institutions at all levels of education. The majority of the 1,200 separate ITFS licensees holding over 200 licenses serve more than 70,000 sites and millions of students. Higher educations' participation in ITFS is significant; 331 colleges and universities hold licenses for 752 stations. ITFS, operating in the 2.5 GHz band, has historically transmitted a broad array of educational services, from in-service training for teachers through classroom

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instruction for students to continuing education courses for the engineering community. Recent developments include diagnostic services for the rural health care community and retraining America's workforce for the global economy.

ITFS, through years of growth and regulation change is now poised to provide yet additional services to the education community. ITFS is expanding its capabilities to provide two way wireless broadband Internet access and high-speed data transmissions in addition to the traditional point to multi-point transmission of one-way video/two way audio programming. This will provide inexpensive access to high-speed broadband services for educational institutions but, most importantly, it will provide high-speed access for thousands of underserved communities across the United States. In today's marketplace, with greater dependence on the Internet for commerce and workforce development, any reallocation of the ITFS spectrum must be opposed.

In the 1980's, FCC rules enabled ITFS educational licensees to become valuable partners of wireless communications companies through the practice of leasing capacity, or network sharing. This important collaboration with industry allowed educational institutions to maintain the educational license and obtained essential equipment and technical support from industry.

Now the future of ITFS and these important collaborations, which have served our communities so well, are in jeopardy. We oppose the reallocation of the ITFS spectrum for 3G services. The ITFS spectrum is a vital educational asset that has been preserved for more than 30 years. Now advanced technology has made it possible for ITFS to expand services, enhance educational opportunities and maintain the nation's economic competitiveness. This spectrum must not be reallocated.

Best regards,

Mark Luker

Mark Luker

cc: Commissioner Harold Furchgott-Roth
Commissioner Gloria Tristani
Commissioner Susan Ness
Peter A. Tenhula
Diane Cornell