



DOCKET FILE COPY ORIGINAL

BOARD OF REGENTS
OF THE
UNIVERSITY SYSTEM OF GEORGIA

OFFICE OF THE CHANCELLOR
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

February 21, 2001

PHONE (404) 656-2202
FAX (404) 657-6979

The Honorable Johnny Isakson
United States House of Representatives
Washington D.C. 20515

RECEIVED

MAR - 7 2001

February 15, 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Congressman Isakson:

I write to you to express our concern about the imperiled future of our educational wireless spectrum. The Federal Communications Commission has issued a Notice of Proposed Rule Making (ET Docket No. ~~00-258~~ RM-9920 and 9911) seeking comment on a plan to relinquish Instructional Television Fixed Service (ITFS) channels to cellular phone companies for third generation (3G) mobile telephone services, stripping our nation's educational community of a powerful and irreplaceable medium. ITFS is an important tool for our educational program in the University System of Georgia. Moreover, ITFS is absolutely critical if wireless broadband is to become a reality not only for our students but also for all communities in Georgia.

Nationally over 1,200 school districts, colleges, universities, and other educational organizations have held ITFS licenses, many of which were issued decades ago. Here in Georgia, Georgia Tech and Georgia State have been making use of this spectrum in partnership with BellSouth Entertainment to deliver educational services to schools and homes in the metropolitan Atlanta area. As with these local services, the majority of ITFS licenses have traditionally provided one-way video broadcasting, but recent FCC rule changes have expanded the educational power of ITFS. Now, advanced learning services, interactive video, and wireless broadband Internet access to students and adult learners in classrooms, homes and workplaces can become a reality. As distance learning becomes more robust and interactive through programs such as Georgia GLOBE™ and eCORE™, ITFS offers educational institutions throughout the state an affordable high-speed on-ramp to the Internet for its students, a mission that was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission you co-chaired. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access into the home not only more widely available but also more affordable.

No. of Copies rec'd _____
List ABCDE

The Honorable Johnny Isakson

February 21, 2001

Page Two

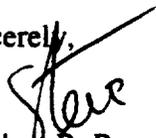
As you know, Georgia has been blessed with tremendous growth in the last decade. However, much of the growth in our educated workforce has been imported, a model that cannot be sustained. Along with the Governor and the Legislature, the Board of Regents and the thirty-four institutions that comprise the University System have embarked on a concerted effort to create a more educated Georgia. A key component of our plans involves the effective application of educational technologies at all levels that rely heavily on access to online resources. Working in conjunction with commercial partners in a fashion similar to the Mississippi-WorldCom example, use of the ITFS spectrum for broadband data services will contribute substantially to access in a mostly rural state where wired infrastructure does not exist and where its installation is too slow and costly to meet our needs.

ITFS used as a two-way digital communications medium will not only benefit schools, it will advance economic development. With public education serving as an anchor tenant, commercialization of the ITFS and neighboring MMDS spectrum can become a reality helping bring broadband services to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the state bridge the Digital Divide.

If the FCC reallocates any part of the ITFS spectrum for the promise of 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 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 the educational community and to underserved communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. We in the University System of Georgia hope that you will continue to support us by maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and well. Thank you for your support.

Sincerely,



Stephen R. Portch, Chancellor
University System of Georgia