RCCC
Rowan-Cabarrus Community College

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Associate Chief Diane Cornell
Wireless Telecommunications Bureau, Room 3-C220
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Associate Chief Cornell:

I am writing you today to express my deep concern over the current move by representatives from the 3-G industry (third generation of mobile/handheld devices) to take over the broadband spectrum tentatively designated for the ITFS consortium of North Carolina community colleges. Rowan-Cabarrus Community College is one of 39 community colleges in the state committed to the ITFS project, a vision of a statewide wireless educational network that will have the capability to reach rural populations and others who would not otherwise have access to the opportunities that lifelong learning can provide for them. In a cooperative partnership with public schools and public universities, the community colleges have formed a consortium that will provide a seamless web of lifelong learning to the public, while at the same time preserving the autonomy of each entity to enable them to address the unique needs of their local population.

Thousands of man-hours and millions of dollars have been invested by the community colleges and their partner, WONC, over the last five years, to transform this vision into a reality for the citizens of North Carolina. The partnership with WONC is unique in that WONC is half-owned by CT Communications, based in Concord, NC. CT Communications, as a local and statewide provider of telecommunications services, is thoroughly familiar with the state's service area and has proven efficient in providing services to rural areas with a low population base, while still turning a profit. In addition, CT Communications has an established commitment to education, and has been a staunch supporter of our own community college. CT Communications has sponsored and

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funded a small business counseling and educational center on our campus in Cabarrus County and provided us with technical equipment, advice, and expertise. WorldCom, the other half-owner of WONC, brings to the partnership access for the community colleges to the WorldCom Foundation, with a revenue stream that will provide for hardware upgrades, and a scale of operations that can provide for greatly reduced cost of services to their educational partners. This valuable partnership, which forms the basis of the consortium, therefore brings benefits that could not be duplicated if consideration was given to an alternate proposal by 3-G members to provide services to us in exchange for reallocation of the bandwidth.

Little recognition nationwide has been given to the terrific strain technological change has placed on public educational institutions, their resources, and their ability to provide valuable services. Reallocation of any of the MMDS or ITFS bandwidth to commercial use for 3-G providers will significantly damage, perhaps permanently, the ability of North Carolina educators to provide this valuable educational resource to the state and its citizens. While 3-G providers could be accommodated through other frequencies, the same cannot be said for the ITFS consortium. Transfer of the ITFS allocation to other frequencies will result in higher equipment costs due to the requirement of higher-powered transmitters, costs public institutions can ill afford to absorb. Further, the effective provision of lifelong learning opportunities necessitates access not just to educational sites, but also to businesses, industries, and homes. The currently allocated bandwidth is thus the optimum frequency allocation for this educational consortium.

The ITFS project, as it is currently envisioned, and the allocation of the bandwidth to the ITFS consortium, will enable Rowan-Cabarrus Community College to expand tremendously its educational offerings through the use of wireless technology. In terms of curriculum courses, the ITFS bandwidth will give RCCC the capacity to more than double its course offerings and degree and certificate programs. In addition, RCCC currently offers 44 classes to the general public which are classified as continuing education courses. With the MIDI/ITFS bandwidth, RCCC currently has plans to expand its offerings in this area to more than 100 classes. Furthermore, the ITFS project will be instrumental in assisting our college to broaden its offerings in the areas of university degree completion programs, and Huskins/dual enrollment classes, one of our active partnerships with high schools in two North Carolina counties.

The ITFS consortium represents a rare opportunity for an educational system to take a quantum leap in the implementation of technology. Public education is at a great disadvantage, compared to private institutions and commercial providers, when attempting to keep pace with rapid changes in technology. I urge you to step forward and

support the future of education in North Carolina by holding steadfast to the original plan to allocate this bandwidth to the ITFS consortium.

Sincerely,

R. L. Brownell
President

dsp

cc: Chairman Michael K. Powell
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