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FEDERAL COMMUNICATIONS COMMISSION
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Georgia State
University

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February 22, 2001

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

EX PARTE OR LATE FILED

Dear Chairman Powell:

I write to you to express my concern for the future of the wireless education spectrum known as ITFS, particularly in light of the Commission's "Notice of Proposed Rule Making on 3G Spectrum Allocations" published on January 5, 2001. Here at Georgia State University we use the ITFS spectrum in a variety of ways, including community outreach, training of telecommunications students and distance learning. Further, as noted by Dr. Stephen Portch, Chancellor of the University System of Georgia, the ITFS channels can provide an essential bridge over the digital divide.

Georgia State University, under the auspices of the University System of Georgia, received its license for C-band ITFS channels in March 1995 and shortly thereafter the University entered into an agreement with Wireless Cable of Atlanta to use "excess capacity." This company was later purchased by BellSouth Entertainment which now utilizes the excess capacity made available under this agreement. This exemplary public-private partnership with BellSouth enables Georgia State University to utilize its ITFS channels in a way that furthers its educational goals and serves the greater Atlanta community.

For instance, one of the University's strategic goals is to internationalize the curriculum and to provide more international experiences for our students. Using ITFS we are able to receive and re-broadcast news and entertainment programs in a variety of languages. These broadcasts are used in our language classes, by international student groups and community organizations.

Another important application for this broadcast technology is in the training of telecommunications students. The Division of Distance and Distributed Learning, which operates the ITFS channels on behalf of the University, has developed a cooperative internship program with the Department of Communication. Students who participate in this program get hands-on experience in a broadcast medium.

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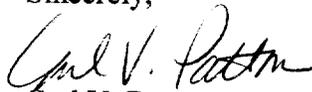
Georgia State University cooperates with its sister institution, Perimeter College, to make a number of telecourses available to the Atlanta community via ITFS. These courses are part of the PBS project known as "Going the Distance," which permits a student to complete an associate degree through distance learning.

In the future, when recent FCC rule changes concerning two-way applications are fully implemented, Georgia State University envisions even greater use of this spectrum, especially for distance learning via the Internet. Presently, we offer some 1200 courses each semester which utilize the Internet in some way. Given the high speed, broadband potential of the ITFS spectrum, we would expect significant increases in this utilization.

As an urban university, Georgia State University is fully committed to the University System of Georgia's efforts to create a better educated citizenry. 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.

Finally, I am concerned that if the FCC reallocates any part of the ITFS spectrum for the promise of 3G mobile device services, then the capacity, usefulness, and value of ITFS would be significantly diminished to Georgia State University and the higher education community. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others, including Georgia State, would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. In either case, 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.

Sincerely,



Carl V. Patton
President

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Commissioner Ness
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