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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 26, 2001

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

Dear Mr. Knapp:

RE: FCC ET Docket 00-258

I write to you concerning the future of the ITFS spectrum, with specific regards to the Commission's Notice of Proposed Rulemaking on 3G that was released January 5, 2001. ITFS is both a critical part of our educational infrastructure and an essential bridge over the Digital Divide. ITFS is absolutely vital to making high speed wireless broadband a reality not only for our students, but also for our entire community. ITFS cannot and should not be relegated to second-class status in favor of 3G wireless.

As you are aware, recent rule changes have opened the ITFS spectrum to the possibility of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has expanded to provide advanced learning services, interactive video, and wireless broadband Internet, and ITFS licensees are scrambling to deploy two-way digital services. Furthermore, as distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet, a goal that was recently cited as the top educational technology priority for policymakers by the bipartisan Web-Based Education Commission. Equally important, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

For over six years, Johnston Community College has spent countless thousands of hours and dollars in an effort to secure licensing for ITFS (Instructional Television Fixed Service) frequencies. It is our intent to duplicate the success of other colleges with ITFS frequencies by leasing a portion of our frequencies to our commercial partner. This way, Johnston Community College would enjoy the use of ITFS frequencies, would have free or reduced access to a very fast internet connection, would have access to the WorldCom foundation, and would have access to a revenue stream that would allow us to keep up with our hardware and personnel costs.

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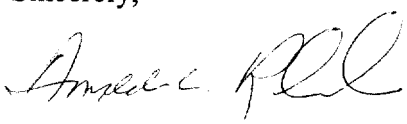
Now that our license is almost awarded, there is a very serious threat to our plans and the great investment of time and money because of the encroachment of the third generation wireless (3G) project.

In addition to the broad range of community programming currently carried on ITFS spectrum, the recent two-way order has filled a void where legislation and regulation have failed. Working in conjunction with commercial partners, ITFS licensees are helping to bring broadband to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community while helping the nation and the Commission to bridge the Digital Divide. If the Commission reallocates all or part of the ITFS spectrum for 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. Most importantly, in either scenario, the ITFS community would almost certainly 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, our educational infrastructure will be threatened and the Digital Divide widened. Johnston Community College hopes that you will maintain the integrity of the ITFS spectrum and keep this tremendous resource alive and strong.

Sincerely,



Donald L. Reichard
President