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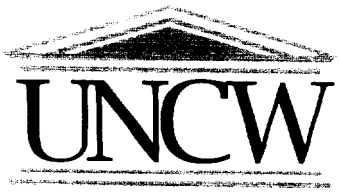

THE UNIVERSITY OF NORTH CAROLINA AT WILMINGTON

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 26, 2001

JAMES R. LEUTZE
Chancellor

Federal Communications Commission
Attention: Commissioner Harold Furchtgott-Roth
445 12th Street, SW
Washington, DC 20554

EX PARTE OR LATE FILED

Dear Commissioner Furchtgott-Roth:

The digital divide is more than a slogan; it is real. Those of us who serve large areas of rural North Carolina recognize the potential reality of an urban and rural state and the powerful educational implications of such a dichotomy. Clearly, access to superior ITFS frequencies is a crucial piece of how we will overcome the digital divide and bring new opportunities to the children, workers and families of those who choose to live in the rural south.

Some are now arguing that educational users of wireless networks can simply move to new frequencies in order to make room for an expanding cellular, handheld market. While simple and appealing in its surface logic, such an argument is at best misleading. To accept this argument one would have to agree to stall efforts to deliver quality education services at a distance and reverse years of hard work by the North Carolina Community College System, their private partners and others in the public school and higher education community who are now on the verge of activating a seamless, wireless educational network. The envisioned network would provide a degree of access and flexibility unavailable in many areas of the state through land networks.

Congress has, through the lease back system, positioned North Carolina to complete a wireless network that has been in the conceptual and planning stages for over seven years. It would be counter to the vision of so many in Congress and leaders here at home to lose the crucial link to such a vision, superior ITFS spectrum frequencies.

As Chancellor of the University of North Carolina at Wilmington, and Chairman of the Rural Internet Access Authority, I have experienced first hand the impact of inequities in educational opportunity across our great state. I know all to well the struggle faced by students who have limited access to advanced programs in math and science, not to mention basic programs. For these reasons, I join my colleagues in the North Carolina Community College System to oppose the proposal to reallocate ITFS frequencies to commercial use to support 3G devices and I ask for your thoughtful consideration of our request to preserve access by educational entities.

Most Sincerely,

Jim Leutze

Cc: Byran Tramont, Legal Counsel
Office of Commissioner Harold Furchtgott-Roth

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James 00-258

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RANDOLPH COMMUNITY COLLEGE

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FEDERAL COMMUNICATIONS COMMISSION
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February 20, 2001

Harold Furchtgott-Roth, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Commissioner Furchtgott-Roth:

Over the last five years, the North Carolina Community College System (NCCCS) and Wireless One of N.C. (WONC) have shared a vision to provide educational opportunities through Instructional Television Fixed Service (ITFS) to thousands of residents throughout the state. As part of the NCCCS, Randolph Community College has been an active participant in this effort to secure ITFS licenses. Randolph realizes the importance of a statewide wireless network that would expand our instructional services to include broadband two-way connectivity. A wireless network would serve not only community colleges, but would also reach out to public schools and public universities. Such a statewide network would enhance our instructional goals and embrace the rural community as well as the urban and suburban populations.

The NCCCS, its colleges, and WONC have dedicated numerous hours to achieve this vision. The commitment of all those involved reflect the importance of ITFS. With so much at stake for education across North Carolina, I am greatly concerned about the effort by 3-G (third generation of mobile/handheld devices) to acquire the licenses Randolph and other colleges have been working so hard to obtain. Their efforts are particularly troubling due to the fact that there are other frequencies available for 3-G's applications.

I have included Randolph Community College's utilization plan to share our vision for ITFS. I hope that the FCC will thoroughly examine the benefits that ITFS will offer the educational community in North Carolina, and through this examination, resolve to set aside licenses for our institutions.

Sincerely,

Richard T. Heckman, Ed.D.
President

RH/cth

Enclosure

cc: Bryan Tramont, Legal Counsel
Office of Commissioner Harold Furchtgott-Roth

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Randolph Community College
Projected ITFS Channel Usage

Services	Peak Usage (proj.)	Hours of Peak Usage	Average Usage	Proposed Application	Number of Courses Utilizing Services	Programs Affected
Electronic Mail/ Messaging	64 Kb/s	7:30 a.m - 10:30 p.m.	16 Kb/s	Instructional Communication	50%	CR, CE, HS, DG, PD, GV
Web Content	512 Kb/s	24 hours	128 Kb/s	Instructional Content	40%	CR, CE, HS, DG, PD, GV
File Transfer	384 Kb/s	7:30 a.m. - 10:30 p.m.	64 Kb/s	On-site Program and Instructional Support	20%	CR, CE, HS, DG, PD, GV
Video/ Audio content	3 Mb/s	7:30 a.m - 10:30 p.m.	512 Kb/s	Streaming Audio and Video	60%	CR, CE, HS, DG, PD, GV
Video Conferencing	5 Mb/s	7:30 a.m - 10:30 p.m.	1 Mb/s	Counseling/Distributed Instruction	30%	CR, CE, HS, DG, PD, GV
High Resolution Video	40 Mb/s	7:30 a.m - 10:30 p.m.	6 Mb/s	Media Distribution/Sharing	20%	CR, CE, HS, DG, PD, GV
Inter Campus Connectivity	40 Mb/s	7:30 a.m - 10:30 p.m.	10 Mb/s	Non-Internet Coursewares	50%	CR, CE, HS, DG, PD, GV
Inter Campus Voice Over IP	2.5 Mb/s	24 hours	256 Kb/s	Live Communication	75%	CR, CE, HS, DG, PD, GV
Total Usage (estimated)	**110 Mb/s**		**20 Mb/s**			

Programs:
CR - Curriculum Courses
CE - Continuing Education Courses
HS - Huskins, Dual Enrollment Courses
DG - Degree Programs
PD - Professional Development
GV - Government

Submitted by
John Davis
Celia Hurley
January 29, 2001

00-258

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EX PARTE OR LATE FILED

February 13, 2001

Commissioner Harold Furchtgott-Roth
Federal Communications Commissioners
445 12th Street SW
Washington DC 20554

Re: **"Opposition to 3-G Raid on Education Initiative with ITFS Frequencies"**

Dear Senator Faircloth: ?

We need your help! Over five years ago, Pamlico Community College became one of the charter members of a shared vision. "***To have a statewide wireless network that would provide broadband two-way connectivity.***" Throughout the five years a wonderful thing has happened. The individual college efforts and strong leadership of the North Carolina Community College System and Wireless One of North Carolina have evolved into The NCCCS Wireless Technology Consortium. However, our efforts have not met without opposition by outside forces. On many occasions the "winds of opposition have tried to dump the wind from our sails" but we haven't capsized yet! This is **why we need your help!**

We are faced once again with a threat to sink a statewide collaboration and shared strategic initiative to provide state-of-the-art technology for educational life-long- learning for rural communities like Pamlico County and the State of North Carolina as a whole. Mobile/handheld devices referred to as 3G are a product that commercial vendors are trying to appeal to FCC to give them the very ITFS frequencies and bandwidth that we so badly need to better serve our students and citizens of Pamlico County. All the countless hours WONC, NCCCS leadership and participating colleges have spent in preparing license applications, locating transmitters, resolving the mutually exclusive application, solving interference problems or securing joint collaborative agreements without objection. Some of the community colleges have put their applications on hold in an effort to support the NCCCS Wireless Technology Consortium. We need to KEEP the MMDS and ITFS channels, as this is the backbone to streamline the technical network strategy for regional sharing of resources and to "*bridge the digital divide.*"

North Carolina is so fortunate to have great leadership in the formation of the statewide consortium aimed at creating the seamless web of lifelong learning. Public schools, community colleges and public universities have a great deal of local autonomy, which allows them to respond to the needs of their communities. Although this approach is problematic, the end results are far reaching in an effort to expand the state-of-the art technology to the business of educating our children and adults.

The ITFS is just the next step in closing the digital divide. North Carolina is made up of twelve television markets and eight secondary markets which include rural areas like Pamlico County, which is still struggling in an uncertain economic base to be a part of the wonderful

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benefits the wireless technology can bring to our community and lifelong learning efforts. If we lose any of the conjoined MMDS and ITFS channels all the work we have put into this project over the last five years will be lost. So many goals and objectives of the educational community would have been in vain. We have a commercial partner willing to work with us as they know how valuable the ITFS channels are and are eager be a part of the project since they will also benefit.

We have demonstrated over five years how working together has provided the Wireless Technology Consortium project with solidarity and enthusiasm. We just can't lose the MMDS and ITFS bandwidth. All the work with the public schools, community colleges, the public universities and our commercial partner will have been in vain. Our vision to provide our community with the technology resources so many other areas of the state enjoy will indeed sink into the deepest holes of the ocean.

Pamlico Community College has a local vision on how we can utilize the wireless technology:

Services we can provide:

- Electronic mail for on-campus, off-campus, and web-based information access.
- "Ask the Librarian" and connect with all agencies in the county.
- "Talk to a Counselor" for students services.
- Video audio content and videoconferencing for "real time" instruction.
- High-resolution video.
- Inter-campus connectivity and inter-campus voice over IP.
- Connectivity for the "new" Pamlico Community College Bayboro Center where Huskins/dual enrollment classes are being offered.
- Interactive video and video classes using for information highway.

Applications we can use with the wireless technology:
Curriculum courses and Continuing Education courses
High School Huskins/dual enrollment
Transfer degree programs with universities
Professional staff development
Administrative procedures through computerized work form cutting costs.
Government, including corrections, health care, emergency management training.
Teacher certification training.

You can help us to fight the raid on the educational strategy to "***bridge the digital divide"*** with ITFS wireless technology by "taking the wind of the 3-G threat and not allow them to raid this very valuable ITFS bandwidth from education providers.

Respectfully,

Marion Altman

Dr. Marion Altman, President

00-258

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February 12, 2001

Commissioner Furchgott-Roth
Federal Communications Commission
445 12 th Street, SW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE OR LATE FILED

Re: FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911

Dear Commissioners:

We are concerned about the future of the ITFS spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. ITFS is an important part of our educational programs in Gadsden, Jefferson, Leon, Madison, Taylor and Wakulla School Districts. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only for our students but also for our entire community.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. 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 for students and adult learners in the classroom, at home and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, 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. ITFS does not only benefit schools, students and adult learners, however. 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 to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless communications companies, ITFS spectrum is being used to bring broadband to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

If the Commission reallocates any 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. 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.

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If the ITFS spectrum is compromised in any way, these public benefits will be lost. We hope that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

Allan E. Ragsdale, Director of Educational Media
LEON DISTRICT SCHOOLS
North Florida Instructional Television Consortium

Peggy Sue Outlaw, Coordinator of Instructional Media and Technology
GADSDEN DISTRICT SCHOOLS

Linda Hewett, Director of Technology Services
JEFFERSON DISTIRCT SCHOOLS

Sue Keel, Coordinator of Special Programs
WAKULLA DISTRICT SCHOOLS

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Mayo

00-258

THE FLORIDA SENATE

Tallahassee, Florida 32399-1100

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SENATOR CHARLIE CLARY
7th District

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 9, 2001

EX PARTE OR LATE FILED

Mr. Michael J. Powell, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Instructional Television Fixed Service

Dear Chairman Powell:

It has been brought to my attention that the FCC has issued a Notice of Proposed Rule Making seeking comment on a plan to relinquish Instructional Television Fixed Service (ITFS) channels to cellular phone companies. By copy of this letter, I would like to voice my strong concern regarding this proposed rule change and offer these comments.

ITFS is a distance learning technology that has provided educational services to students and teachers since the 1960s and is currently used for a broad range of services, from in-service training for teachers to providing classroom instructions to students. Distance learning depends on ITFS and thousands of schools across the country are currently using ITFS to provide video services to their students. Any change or limitation on spectrum allocated to ITFS licensees would damage long-standing education services and undermine deployment of wireless broadband to underserved areas.

In closing, before any action is taken on this proposed rule change, I sincerely hope that serious consideration is given to maintaining the integrity of the ITFS spectrum and keeping this tremendous educational resource alive and well.

Cordially yours,

Charlie Clary III

Charlie W. Clary, III
State Senator, District 7

CWC:pah

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REPLY TO:
1241 Airport Road, Suite A, Destin, Florida 32541 (850) 833-9159
418 Senate Office Building, 404 South Monroe Street, Tallahassee, Florida 32399-1100 (850) 487-5009

Legislature's Website: *http://www.leg.state.fl.us*

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FAYE W. BLANTON Secretary
DONALD SEVERANCE Sergeant at Arms

CORRESPONDENCE

Legal advisor: Susan Eid

Response Required? **Yes** ☐ **No** ☐

OCH _____

Bureau _____

Date to Bureau: _____

Response Date: _____

OFFICE OF THE PRESIDENT

University Plaza
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HAROLD FURCHTGOTT-ROTH

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Georgia State University

February 22, 2001

EX PARTE OR LATE FILED

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

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, a unit of the University System of Georgia, is an equal opportunity educational institution and is an equal opportunity/affirmative action employer.

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

Carl V. Patton
President

Copy: Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Tristani

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James 00-258

BOARD OF REGENTS
OF THE
UNIVERSITY SYSTEM OF GEORGIA

OFFICE OF THE CHANCELLOR
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ATLANTA, GEORGIA 30334

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 21, 2001

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

EX PARTE OR LATE FILED

Re: FCC ET Docket 00-258

February 15, 2001

Dear Chairman Powell:

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 the development of our educational infrastructure and an essential bridge over the Digital Divide. Here in Georgia, ITFS is a vital tool for making high speed wireless broadband access a reality for our students and for our citizenry in general, especially for those in rural areas. ITFS cannot and should not be relegated to second-class status in favor of the promise of 3G wireless services.

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 co-chaired by Representative Johnny Isakson from Georgia. 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.

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Georgia, the largest state east of the Mississippi, 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 campaign 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, 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.

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 our Digital Divide widened. The University System of Georgia hopes that you will maintain the integrity of the ITFS spectrum and keep this tremendous resource available to create a more educated America.

Sincerely,

Stephen R. Portch
Chancellor
University System of Georgia

Cc: Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Tristani

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James 00-258

BOARD OF REGENTS
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February 21, 2001

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

EX PARTE OR LATE FILED

Re: FCC ET Docket 00-258

February 15, 2001

Dear Chairman Powell:

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If the ITFS spectrum is compromised in any way, our educational infrastructure will be threatened and our Digital Divide widened. The University System of Georgia hopes that you will maintain the integrity of the ITFS spectrum and keep this tremendous resource available to create a more educated America.

Sincerely,

Stephen R. Portch
Chancellor
University System of Georgia

Cc: Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Tristani

00-258

THE CALIFORNIA STATE UNIVERSITY

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SAN BERNARDINO
SAN DIEGO
SAN FRANCISCO
SAN JOSE
SAN LUIS OBISPO
SAN MARCOS
SONOMA
STANISLAUS

February 21, 2001

Honorable Michael Powell
Chairman
Federal Communications Commission
445-12th St., S.W.
Washington, DC 20554

Dear Chairman Powell:

In response to the Notice of Proposed Rulemaking and Order in the captioned proceeding, FCC 00-455 released on January 5, 2001, I urge you to preserve the 2500-2690 MHz band currently allocated for and used by stations operating in the Instructional Television Fixed Service (ITFS) and the Multichannel Multipoint Distribution Service (MMDS).

The separate universities of the California State University (CSU) system provide hundreds of hours of instructional programming each week. Many of the students served by these ITFS stations live in the remote and rural areas of California with few other ways to access higher education. Many more live in urban centers, impeded by considerable distances and heavy traffic from participating in courses on campus. In addition to serving thousands of our enrolled students through ITFS, the CSU is reaching out to K-12 students and adult learners with advanced placement courses, educational enrichment programs for children in the primary grades, such as the "Jason Project," and English as a Second Language (ESL) instruction.

Now, as a result of recent technological developments and Commission regulations, we are on the brink of moving to high-speed, two-way fixed wireless data transmission services, allowing us to extend broadband Internet access to our students, faculty, and others in and around our campus communities. With this significant new interactive mode of transmission, we can better serve California learners of all ages wherever they are and at times that best accommodate their schedules.

Having made substantial investments in the development of the ITFS spectrum, the CSU takes very seriously the potential threat to the spectrum posed by the Third Generation mobile services, known as "3G." The CSU and the other public higher education systems in California are facing an unprecedented increase in enrollment, commonly referred to as "Tidal Wave II." The CSU alone, which currently serves more than 370,000 students, is anticipating an influx of some 117,000 additional students over the next decade – an increase of approximately 40 percent. We have undertaken already a number of steps to accommodate this tremendous growth in enrollment, including the creation of three new universities – the third will become a freestanding university in 2002. ITFS and the high-speed, wide area networks that our spectrum will now support are essential to our efforts to serve more efficiently a much larger universe of students. Moreover, maintaining spectrum for educational purposes will also help us to keep instructional costs down.

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The CSU is using ITFS is to deliver instructional programming to California's K-12 classroom teachers and teaching credential candidates. For instance, over the last ten years, CSU, Dominguez Hills, outside Los Angeles, has used ITFS to help some 10,000 students obtain their teaching certificates. With one of every ten of our state's teachers teaching under emergency certificates, the challenge is to support these teachers as they confront the day-to-day challenges of today's hard-to-staff classrooms while, at the same time, helping them to obtain a full teaching credential. If we fail to support adequately these teachers, data demonstrates that more than half of them will leave the teaching profession permanently within 1 – 3 years. With the nation confronting a shortage of teachers in excess of 2.2 million over the next 10 years, some 250,000 – 300,000 new teachers will be needed in California alone, we can ill afford to lose our capacity to deliver services to these emergency credentialed teachers.

Similarly, the nation is grappling with a severe shortage of nurses, with the most severe shortage in California. ITFS provides a flexible, relatively low cost way to set up service sites for nursing students in hospitals and other off-campus locations.

Some of our campuses are also using ITFS to help military personnel and employees of major corporations including Boeing, Raytheon, and Hewlett Packard, to upgrade their skills and keep pace with the demands of an increasingly technology-dependent workforce. Attached please find summaries of the ITFS services provided by three California State University campuses: CSU, Sacramento, CSU, Long Beach, and CSU, Fullerton.

Chairman Powell, on behalf of the 23-campus California State University system, I ask you to ensure that the 2500-2690 MHz band is preserved for instructional programming.

With kind regards,

Sincerely,

Charles B. Reed
Chancellor

CBR/bab

Attachments

cc: Honorable Susan Ness, Commissioner
Honorable Gloria Tristani, Commissioner
Honorable Harold Furchgott-Roth, Commissioner
Ms. Magalie Roman Salas, Secretary

ITFS: PROMOTING BETTER GOVERNMENT
California State University, Long Beach

Summary. Through ITFS, exceptional civil servants in California receive the training they need to ensure high-quality public administration. Cal State Long Beach's Masters in Public Administration has trained a broad range of civic leaders throughout the state, from local city administrators to state transportation officials, contributing to improved services in essential areas. These talented public servants have been able to hone their administrative skills even as they work, thanks to the convenience and flexibility offered by ITFS. In addition, ITFS broadcasts provide a valuable forum for communication between the University and the community in which it resides.

A Community University With a Long Reach. California State University at Long Beach—also known as Cal State Long Beach—is largely a commuter campus, serving 30,000 full and part time students. ITFS is a critical part of the University's mission to deliver educational opportunities to this large area. Recognizing the need to give exceptional civil servants the training they needed to provide top-notch public services,

Cal State Long Beach, several municipalities and other agencies together developed a Masters in Public Administration (MPA) program. Each year approximately thirty to fifty local government workers and civil servants attend courses from their work place or other conveniently located sites. Current "rising stars" at the Police Department, the Orange County Department of Transportation, and several mayors' offices were all students of the MPA program.

In fact, ITFS has extended the reach of this powerful educational resource beyond Orange County. Cal State Long Beach, in partnership with CALNET (an ITFS-based network), is now providing its MPA programming throughout Southern California. This expanded reach creates the kind of student critical mass necessary to attract top instructors in public administration. "It is professionally rewarding to provide course content that is such an asset to the communities as well as to the individual student," said Mat Kaplan, Director of Technology and Distance Learning for University College and Extension Services at the University.

Providing Training to the Public and Private Sector. In addition to producing and transmitting the MPA programming, students and administrators on campus broadcast training seminars and conferences for corporations and government agencies using the University's ITFS capacity. Cal State Long Beach regularly creates programs for McGraw-Hill Publishing and the Department of Justice's National Institute of Corrections, often reaching more than 1,000 training sites, and over 10,000 trainees statewide.

Enhancing Town-Gown Relations. Cal State Long Beach's ITFS system also carries programming for residents of Long Beach and nearby communities 24 hours a day, 7 days a week. University President Robert Maxson believes that, "the technology that accompanies our ITFS bandwidth has benefited our campus and our community in numerous ways. Along with the distance learning opportunities we are able to provide by

utilizing this bandwidth, we offer a weekly program, called Beach View, that is broadcast through large areas of the greater Long Beach/Los Angeles area. Our topics are meant for general audiences and have covered everything from helping children succeed in school to ways seniors can prevent osteoporosis to the Southland's heritage, languages and cultures."

Corporate Contributions to Community Education. The ITFS capacity used by Cal State Long Beach more than doubled when Pacific Bell began sharing the spectrum with the University. In exchange for some capacity, Pacific Bell implemented digital technology transmission, installing new equipment on campus and at receive sites. The digital conversion has allowed Cal State Long Beach to double its ITFS programming while still freeing up excess capacity to lease to current corporate partner Worldcom Broadband Solutions in order to support both the distance education program and community outreach efforts.

Contact: Mat Kaplan
e-mail: mrkaplan@csulb.edu
(562) 985-7915

ITFS Summary Information

Number of Channels: 20% of E group
Channel ID: E
Call Signs:

Quantity of Receive Sites: 4
Channels Operational Status: Operational
Program Scheduled hours: 24/7

California State University, Fullerton

Contact: Jahna Kahrhoff
Director, Distance Education
714-278-4651
jkahrhoff@fullerton.edu

Summary. Using its reliable, flexible, and cost-effective ITFS system, California State Fullerton (CSUF) trains teachers and nurses during a time of shortage, gives educational opportunities to a diverse and dispersed community of learners, and delivers courses to corporate sites to help workers stay competitive. Since 1986, a network of five ITFS channels have been the backbone of Cal State Fullerton's outreach to 900 learners a week in Southern California. In addition, ITFS programming is available on the region's cable companies, providing enriching cultural programming 24 hours a day.

The elimination of ITFS would severely hamper CSUF's ability to achieve its goal of bringing educational opportunities to a diverse community of learners. In addition, it would cause the loss of almost $4 million invested in equipment and technical expertise; require an expensive reinvestment in new technologies; end a substantial revenue stream used to support distance learning; and create enormous disruptions in classes available to students.

Distance Learning for Credit and Career Development. CSUF is largely a commuter college, and runs several satellite campuses. Students at these off-campus sites rely on ITFS-delivered courses to complete degree program requirements in such areas as engineering, communication, nursing, business, history, religion, and more. Professionals at area corporate locations, such as Boeing and Raytheon, participate in timely training opportunities and learn important job skills essential to keep these workers competitive.

The following are just a few examples of special programs offered by CSUF that have targeted the unique needs of specific populations in southern California:

- In-service training for K-12 teachers at their work sites with necessary continuing education course work for their credentials. ITFS courses cut down on substitute time, easing the burden on already strained local school budgets.
- Early college course enrollment for high school students provided at their high school locations.
- Course enrollment at military facilities for staff improvement at those facilities.
- Advanced Engineering course work delivered to industrial sites throughout southern California
- ESL courses delivered to schools, adult education facilities, and work places.

ITFS: Making Distance Learning Cost Effective. The current ITFS system is the only practical and cost effective way for CSUF to deliver valuable and timely educational programs throughout southern California. Sites can be set up quickly, with relatively little cost compared to competing technologies. For example, a new, non-university, codec

site would cost nearly $40,000 for equipment and connectivity to the network, and additional annual costs of approximately $18,000 for fiber connectivity. On the other hand, with ITFS, there is a one-time installation cost of $2,300 with no annual fees. As a result, CSUF is able to respond flexibly and promptly to changing learning requirements, offering engineering courses at an industrial site one semester and nursing courses at a hospital the next. This flexibility is a key component of CSUF's plans to keep up with the face of change in Southern California's economy.

An Investment in Education. Cal State Fullerton stands to lose almost $4 million invested in its current ITFS system if it looses its license. These monies have been used to build and equip television classrooms, a television studio, network operations center, and to pay for thousands of hours of expert labor. If ITFS technology were no longer available CSUF would have to suspend delivery of credit courses, rebuild classrooms to accommodate other means of delivery, expand landline network capabilities, and make major investments in training and development. Local businesses that rely on the ITFS network would also be hit with significant costs. Also, CSUF gets a substantial revenue stream from leasing its excess ITFS capacity. That revenue directly supports the development and maintenance of distance learning programs and allows CSUF to continue to expand and bring its unique resources to an ever-growing community of learners.

A Dynamic, Expanding Program. The university is currently planning several additional off-campus sites and new distance education programs, all of which will utilize ITFS for course delivery. For example, because of an alarming shortage of nurses, the Cal State Fullerton Nursing program is expanding its degree programs in southern California to meet the direct needs of the community. ITFS will provide healthcare organizations the opportunity to become part of our delivery network immediately, at low cost, to take advantage of this timely and essential program.

California State University, Sacramento

Contact: Spencer A. Freund, Associate Vice President for Academic Affairs
Telecommunications
California State University, Sacramento
spencerfreund@csus.edu
(916) 278-5764

Summary:
California State University Sacramento (CSUS) has a model ITFS system, providing 4 channels of educational programming 24 hours a day, 365 days a year in association with a consortium of local school districts, junior colleges, and universities. ITFS courses also are aired on local and regional cable television systems as a part of the basic cable programming package, providing continuing education to the general population. In addition, CSUS is working with a commercial partner to make wireless broadband available throughout the Sacramento area, and expects to have a fully two-way system available in Spring 2002.

Serving a Large, Diverse Community. CSUS is one of the flagship institutions of the California State University system, a group of 23 state universities located throughout California providing educational opportunities to over 375,000 students. CSUS, with a student body of over 27,000, serves the state capital and surrounding areas, which includes impoverished urban neighborhoods, wealthy suburbs and rural farmlands. The university's commitment to distance and distributed education has spirited an expanded schedule of approximately 60 courses in the 2001/02 academic year. A movement from analog to digital technology in the next year will provide an even greater number of program and course offerings.

As a member of the Sacramento Educational Cable Consortium (SECC), CSUS broadcasts a variety of lifelong learning programs to the local school districts, community colleges and the audiences they serve. In addition, ITFS airs educational programming to a potential audience of 350,000 on local and regional cable television systems, all of whom carry the ITFS signal live. This programming is carried on the least expensive tier of the cable television systems, making it a truly "public" resource.

By broadcasting to this wide network of sites, the ITFS system has expanded the reach of high-quality teaching, and has saved many students from lengthy commutes in a traffic-clogged region, expanding the overall attendance of these otherwise inaccessible classes. The ITFS system also reaches many local businesses, such as Hewlett Packard. This increases the educational opportunities for students who are already in the workforce or cannot easily travel long distances to attend on-campus classes.

Each quarter, several thousand students take courses for credit over the ITFS system, while members of the public also "audit" courses from home. The majority of this programming – 15 hours a day – is classroom-based educational programming, while non-classroom educational programming runs after hours.

Through the ITFS system, high school students are able to take a wide variety of courses not available in their schools, ranging from English as a Second Language (ESL) to American History, Civics, English, GED test preparation, and basic skills. Many of Sacramento's recent immigrants to the United States take advantage of the ESL classes through adult learning programs. The system also broadcasts a wide range of traditional K-12 programming used by elementary and secondary school students. For example, primary school children will participate in the national "Jason Project," a program aimed at enhancing environmental awareness through live "field trips" to sensitive coastal areas, access to unique panel discussions, and lectures by top scientists. Cable viewers are able to audit classes, watching at their convenience classes that assist learning, help move people into the information age (e.g., Communications courses focused on the internet and its capabilities), and enrich their lives.

Moving into the Future. Experts agree that high-speed Internet access and two-way transmission significantly enhances distance learning and increases the productivity and effectiveness of both educators and students. To this end, CSUS plans to develop an Intranet and expand its video-based services through digital technology. Working with its commercial partner, CSUS is moving aggressively to bring two-way wireless broadband to students, faculty, and the local community. Although they have not finalized the details of their arrangement with IP Wireless, they expect to be able to provide at least 1,600 of the 2,200 faculty and staff members with minimal cost wireless broadband service into their homes. This will allow them to telecommute to and from campus, develop online resources for students, and instantaneously access information resources available on campus. In addition, CSUS wants to ensure that its students – most of whom live in the surrounding community– will be able to connect to the University and its resources through broadband service. As a result, CSUS is negotiating an arrangement to allow students to purchase wireless broadband access at a reduced rate. These students will be connected directly into CSUS' backbone network, which will include high-speed webcast versions of many of the classes broadcast via the ITFS system.

In addition to being extremely robust, the technology used in this network will be portable. The wireless modem is smaller than a pack of playing cards, allowing students, faculty, and other subscribers to attach it to a laptop and use it virtually anywhere in the region. Students, faculty, and staff with laptop computers will be able to connect from home, work, and school without significant variations in the quality of service.

Bridging the Digital Divide. CSUS plans to use some of its wireless broadband to also link local school districts and adult learning centers into its "intranet," thereby giving them greater access to its information resources. Several urban and rural areas in the CSUS region only have limited, if any, access to the Internet. The university plans to develop partnerships with school districts in order to provide them with broadband capability. In areas with no access to DSL, CSUS also plans to give other community organizations, such as libraries and civic-minded businesses, access to wireless broadband in partnership with IP Wireless, demonstrating once again ITFS' importance as a major resource for community building.

The IP Wireless intends to offer an array of wireless services targeting areas that meet the needs of the residential consumer and small business environment. At this point, they plan to offer service ubiquitously throughout the area – meaning that those neighborhoods that have been bypassed by cable modem and DSL providers (a significant portion of the area) will be able to receive broadband Internet access at home. Although the marketing plan will focus first on those neighborhoods that do not have access, IPWireless will also compete with cable modem and DSL service in the region. This wireless bridge across the digital divide will be the first (and only) choice for broadband Internet service for many residents and business establishments.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

401 GOLDEN SHORE • LONG BEACH, CALIFORNIA 90802-4210

Honorable Harold Furchgott-Roth
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Transforming Education Through Information Technologies

EDUCAUSE

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HAROLD FURCHTGOTT-ROTH

February 16, 2001

EX PARTE OR LATE FILED

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

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