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March 8, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Chairman Powell
Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Tristani

Federal Communications Commission
445 12th St., SW
Washington, DC 20554

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

Dear Commissioners:

I am writing to express concern about the imperiled future of our educational wireless spectrum. The Federal Communications Commission is 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 part of the educational program at California State University, Fullerton (Cal State Fullerton), my alma mater. Moreover, ITFS is critical if wireless broadband is to become a reality.

Cal State Fullerton is the licensee of five Instructional Television Fixed Service (ITFS) stations: four located at Mt. Modjeska and one at Mt. Wilson. Since 1986, ITFS has been the backbone of the university's outreach efforts to learners in Southern California. Today, approximately 90 hours of credit coursework are delivered each week to over 900 learners at educational and corporate sites. In addition, ITFS is used to connect with the region's cable companies and provide non-credit community enrichment programs 24 hours a day.

ITFS provides the campus with many important benefits. Students at 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. The community at large also benefits from enriching, non-credit programming. Following are just a few examples of special programs targeting 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.
- 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.
- Upper division Engineering course work delivered to industrial sites throughout Southern California.
- ESL delivered to diverse locations throughout the region.

The current ITFS system is the only practical and cost-effective way for Cal State Fullerton to access the community at large and deliver valuable and timely educational programs throughout Southern California. Receive sites can be set up quickly with little cost compared to other, much

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more expensive alternatives such as codec. A new, non-university codec site would cost nearly $40,000 for equipment and connectivity to our network and additional annual cost of approximately $18,000. On the other hand, with ITFS, there is a one-time installation cost of only $800, approximately $1,500 in equipment costs, and no recurring fees. In addition, ITFS is used as a reliable back-up system for other distance delivery modes.

Cal State Fullerton has invested approximately $3.8 million dollars in its current ITFS system. 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 labor supplied by television production and telecommunication specialists, communication students, instructional developers, and program administrators. This investment could be lost.

In the future, Cal State Fullerton plans to continue use of wireless technologies for the delivery of credit and non-credit programs to its community of learners. 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.

If ITFS technology were no longer at our disposal, Cal State Fullerton would have to suspend delivery of credit courses, rebuild classrooms to accommodate other means of delivery, expand landline network capabilities and make major investments while students are without access to important courses. In addition, the University will lose a substantial revenue stream from leasing its access ITFS channels -- revenue that directly supports the development and maintenance of distance learning programs.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. I hope that you will support maintaining the integrity of our spectrum and keeping this tremendous educational resource available. In summary, ITFS is the reliable, flexible, and cost effective delivery mechanism that allows Cal State Fullerton to meet its institutional mission and remain responsive to the educational needs of our community.

Sincerely,

Marsha Gallavan
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Fullerton, CA 92835