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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 20, 2001

Via Hand Delivery

Magalie Román Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Notice
ET Docket No. 00-258;
Supplement to Comments of the Association of America's
Public Television Stations

Dear Ms. Salas:

The Association of America's Public Television Stations ("APTS") hereby submits this supplement to its Comments filed February 22, 2001 in the referenced proceeding dealing with the allocation of spectrum for third generation mobile telephony ("3G").

In its Comments, at page 12, APTS provided information from one of its member stations regarding the costs that would be associated with the relocation of certain ITFS channels licensed to that station. The costs figures, totaling \$420,500, were derived from the estimated current cost of the 2.5 GHz equipment that the station believed would need to be replaced. These cost figures were meant as an example only and were not meant to represent the relocation costs across the industry in general. As such, APTS believes that it is necessary and appropriate to clarify its Comments.

First, because the figures given represent the replacement cost of certain analog ITFS equipment only (transmitters, combiners, feed lines, antennas and receivers), they do not necessarily provide a complete assessment of the equipment costs that would be incurred upon relocation of ITFS to some other band where equipment has not yet been developed and propagation characteristics and other engineering factors may be different. Second, the figures used do not include other potential costs associated with relocating the station's ITFS channels to a different band. These additional costs may include:

- professional or other personnel costs (engineering, legal, installation etc.);
- costs of securing additional transmitter sites, transmission equipment and backhaul links, or of more expensive receive site equipment;

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- costs associated with the loss of operational and maintenance support;
- lost revenues from the invalidation of excess capacity agreements that would otherwise be used to support a station's educational mission; and
- costs related to the impairment of the station's educational services during the time of transition and thereafter.

APTS understands that the National ITFS Association will file further estimates that attempt to address the costs that would be incurred by ITFS licensees and the ITFS community on a nationwide basis if any of the 2.5 GHz band is taken for 3G services.

Should any question arise concerning this clarification, kindly contact the undersigned.

Respectfully submitted,



Marilyn Mohrman-Gillis
Vice President, Policy and Legal Affairs

cc: Julius Knapp, Office of Engineering and Technology, Room 7-B133
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