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ADEC

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March 23, 2001

Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

ITFS and 3G Notice of Proposed Rulemaking and Order ET Docket No. 00-258 (FCC 00-455)

The Alliance for Distance Education in California (ADEC) opposes jeopardizing the current educational use of the 2500-2690 Megahertz (MHz) radio frequency band to accommodate Third Generation (3G) mobile systems, as proposed in FCC Docket Number 00-455 (ET Docket No. 00-258). ADEC is an intersegmental group of people working at California universities, colleges, adult education systems, kindergarten through twelfth grade school districts, schools and private sector institutions, organizations and companies which support distance education in the state of California. Our organization supports distance learning initiatives and encourages development of informed distance education policy, laws and regulations.

Lifelong Learning in the Information Age

ADEC believes 3G mobile operations should not disrupt or replace the wireless dissemination of educational offerings by the more than one hundred California schools, colleges, universities and other educational institutions and organizations that currently use the 2 Gigahertz (GHz) Instructional Television Fixed Service (ITFS) spectrum. For over three decades ITFS on the 2.5 through 2.69 GHz band has been used in California to expand and enhance the learning experiences of hundreds of thousands of kindergarten through twelfth grade students, college and university undergraduate and graduate students, and postgraduate professionals such as teachers, medical doctors, nurses and engineers.

Narrowing the Digital Divide with New Technologies

The recent advent of digital two-way ITFS operations allows adding educational offerings like the Internet and other digital data, voice and video services, especially to underserved students and professionals in rural and urban areas where wired media provision of such services is either unavailable or extremely expensive. Unfortunately, if ITFS operators have to share this band with 3G mobile operations or, worse yet, if ITFS operators are moved in whole or in part out of the 2 GHz spectrum, vital educational

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services developed over decades could experience harmful disruption to their quality educational programming and severe reduction of their services.

3G Could Destroy Vital Educational Programs

MDS (Multipoint Distribution Service—a commercial 2 GHz service) operators currently provide millions of dollars in needed funding to ITFS licensees throughout California through excess capacity leasing agreements. Many vital elementary, secondary, undergraduate and graduate educational programs may be destroyed if MDS operators are unable to continue providing such financial support for ITFS systems because of the economic impact of shoehorning technically incompatible 3G mobile systems onto the 2 GHz ITFS and MDS spectrum. Even the Federal Communications Commission's own November 15, 2000 interim report *Spectrum Study of the 2500-2690 MHz Band: The Potential for Accommodating Third Generation Mobile Systems* shows the imprudence of trying to operate 3G on the ITFS and MDS channels. The interim report states that "The 2500-2690 MHz band is in a state of rapid evolution by incumbent ITFS and MDS licensees...[and]...used currently to provide video services for education and training in schools, health care centers and a wide variety of other institutions, as well as for the provision of a commercial video distribution service known as wireless cable." The Commission's interim report concludes "Segmenting the 2500-2690 MHz band to enable third generation mobile wireless systems access to this spectrum would raise technical and economic difficulties for incumbents...[and]...could affect the economics of current and planned ITFS and MDS systems and their ability to provide service to rural areas."

Other More Compatible Spectrum

There are other bands of radiofrequency that 3G services could better operate on than the ITFS band. Even the currently allocated cellular radio spectrum could add 3G services with an efficient digital technology implementation. When the FCC fully considers the technical difficulties and economic harm to educators of imposing 3G on the ITFS spectrum, ADEC is confident that the Commission will allocate the 3G mobile service to a different radio frequency band that does not harm the education of California's school children, lifelong learners and professionals.

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Sincerely,

Kitty Salinas

Kitty Salinas, President
Alliance for Distance Education in California

Attachment: Appendix A—ADEC's ITFS Interest Group Steering Committee
Appendix B—California ITFS Licensees

cc: California Congressional Delegation Members
Senator Feinstein
Senator Boxer
FCC Commissioners

Appendix A—ADEC's ITFS Interest Group Steering Committee

Willi Bokenkamp, University of California Office of the President
Bruce Braciszewski, San Diego County Office of Education
Gregory Cohen, Sprint Broadband Wireless Group
Shirley Connolly, Catholic Telemedia Network
Glenda Diggle, Santa Clara County Office of Education
Jeffrey Gordon, IPWireless
Don Gregory, Fresno County Office of Education
John Helmore, WorldCom
Paul Krivonos, ADEC Past President
Mike Magee, Flannery Group
Martha Sessums, Association for Continuing Education

Appendix B—California ITFS Licensees

Anaheim City School District
Archdiocese of Los Angeles Education and Welfare Corporation
Association for Continuing Education
Board of Education, Long Beach United School District
Butte Community College District
Butte County Office of Education
California Human Development Corporation
California Polytechnic State University Foundation
California State Polytechnic University—Pomona
California State University
California State University—Chico
California State University—Fresno
California State University—Fullerton
California State University—Los Angeles
California State University—Northridge
California State University—Sacramento
California State University—San Bernardino
California State University—San Diego
California State University—San Jose
California State University—Stanislaus
California State University Board of Trustees
Caritas Telecommunications
Central Union High School District
Children's Cross-Cultural Communications Foundation
Clarendon Foundation
College of the Redwoods
College of the Sequoias
Diocese of Orange, Education and Welfare

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Diocese of San Bernardino Education and Welfare Corporation
Education North Valley, Inc.
Escondido Union School District
Franciscan Canticle, Inc.
Fresno County Superintendent of Schools
Hartnell Community College
Hispanic Information and Telecommunications Network
Humboldt County Office of Education
Imperial Community College District
Imperial County Office of Education
Instructional Telecommunications Foundation, Inc.
Intelecom Intelligent Telecommunications
Kern Community College District
Kern County Superintendent of Schools
Kern Educational Telecommunications Consortium
Kern High School District
Kings County Superintendent of Schools
Leland Stanford, Jr. University Board of Trustees
Los Rios Community College District
Lucia Mar Unified School District
Madera County Superintendent of Schools
Madera Unified School District
Mariposa County Unit School
Meadows Union School District
Mendocino County Office of Education
Mendocino County Superintendent
Mendocino Lake Community College District
Merced County Superintendent of Schools
Monterey County Superintendent of Schools
North American Catholic Educational Programming Foundation, Inc.
Northern California Education Television Association, Inc.
Oceanside Unified School District
Palomar Community College
Panama Buena Vista Union School
Paradise Unified School District
Pasadena Unified School District
Paso Robles School District
Peralta Community College District
The Regents of the University of California—UC Berkeley
The Regents of the University of California—UC Davis
The Regents of the University of California—UC Riverside
The Regents of the University of California—UC San Francisco
The Regents of the University of California—UC Santa Barbara
Roman Catholic Communications Corporation
Rural California Broadcasting Corporation
Saddleback Community College District

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San Bernardino Community College District
San Diego Community College District
San Diego County Department of Education
San Joaquin Delta Community College
San Luis Coastal Unified School District
San Luis Obispo Community College District—Cuesta College
San Luis Obispo County Superintendent of Schools
Santa Ana Unified School District
Santa Clara County Board of Education
Santa Cruz County Superintendent of Schools
Santa Maria Joint High School District
Santa Rosa City Schools
Santa Rosa Junior College
Santa Ynez Valley Union High School District
Seeley Union School District
Shekinah Network
Sonoma County Superintendent of Schools
Sonoma City Superintendent of Schools
Tulare County Superintendent of Schools
University of Southern California
Ventura County Superintendent of Schools
Views on Learning, Inc.
Vista Unified School District
Yosemite Community College District
Yuba Community College District