

Response to the FCC'S Notice of Proposed Rulemaking on

Colorado State University is the holder of a license for ITFS spectrum. We have read the Notice of Proposed Rulemaking FCC 00-455 in detail, and have thought deeply about it. Per your request, we offer the following comments:

1. In our region of the country, the "digital divide" is a reality. AT&T's @Home and Qwest's DSL are available to only a limited number of our constituents, and we do not view this situation changing significantly in the next decade. Therefore, wireless technology is the only way that a large number of our constituents will ever receive high-speed Internet services. Wireless transport is therefore essential to our educational mission.

2. As we deliver more and more multimedia via the Internet, our Internet traffic and associated costs continue to grow dramatically. In fact, we are relying on the revenue that we anticipate obtaining from leasing a portion of the ITFS spectrum for which we hold a license in order to meet these increasing costs. Indeed, the growth in traffic and associated increase in costs will in part be due to the greater "reach" provided by high-speed wireless technology delivered over our ITFS spectrum.

We therefore urge the CC to consider these aspects as it embarks upon its rulemaking. Preservation of ITFS licenses is the only manner in which we can provide access to educational material to a broad constituency. Furthermore, "converged" services will be delivered via IP in a secure, reliable, proven and seamless fashion over ITFS spectrum. Finally, we are relying on the revenue that we anticipate garnering from the leasing of a portion of the spectrum for which we hold a license, in order to meet the increasing costs of delivering education via the Internet.