



M I C H I G A N
G O V E R N M E N T
T E L E V I S I O N

Docket No. 00-258

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OFFICE OF THE SECRETARY
HAROLD FURCHTGOTT

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Re: FCC ET Docket 00-258

Dear Mr. Furchtgott-Roth,

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 on January 4, 2001. My understanding is that the FCC is considering recapturing this bandwidth for auction to providers of third generation wireless services. ITFS's loss of the use of the 2500-2690 MHz band could have serious consequences for the organization I represent, Michigan Government Television (MGTV), as I will explain.

MGTV, a non-profit 501 (c) 3 corporation, is a part-time cable television network modeled on the C-SPAN networks and providing the citizens of Michigan unedited and unbiased coverage of all branches of Michigan's state government. Our programming includes live and tape-delayed coverage of the Michigan House and Senate sessions, Michigan Supreme Court oral arguments, commissions and boards within the executive branch, and related programming. It is the *only* source of such programming in this state and currently reaches over 1.5 million homes, schools, and offices served by cable television in this state.

While our programming provides a tremendous service for the citizens of Michigan in general, it is, we feel, especially valuable to our students and teachers. Exposure to the proceedings of state government at an early age and under the guidance of good instructors can help build new generations of better citizens, citizens who, because they understand the workings of their state government, are more likely to be involved in it.

In two major and largely rural areas of Michigan (Michigan's "Thumb" and the northern area of the lower peninsula that encompasses the communities of Petoskey, Charlevoix, and Mackinaw City among others), MGTV's programming is carried on ITFS channels thanks to cooperative agreements among those area's cable providers, the educational organizations managing the ITFS channels, and MGTV. These agreements allow us to reach more than 50,000 cable subscribers who would not otherwise have this direct access to their state government.

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Were these ITFS channels to disappear, MGTV would not only lose a substantial amount of revenue (like C-SPAN, we are supported by a per-month, per-subscriber fee paid to us by the cable providers who carry our programming; there is no charge to the ITFS networks or the schools for our programming), but also we would lose the ability to connect all of these cable subscribers to their state government through our programming.

Many of the people in these areas already feel isolated from their state government in Lansing and are unable to travel to the state capital either because of the distance involved or because of a lack of the resources to make that trip possible. Furthermore, while bus trips to the Capitol in Lansing are fairly commonplace for school districts within a certain radius of Lansing or from more urban or prosperous districts, such trips for students in many of the communities we reach on these ITFS channels are out of the question. MGTV helps to remedy that situation by putting students in these areas right on the floor of the Michigan House or Senate through our live carriage of legislative sessions.

We hope you will give serious consideration to our comments as you consider the rededication of this bandwidth to a commercial purpose. From the perspective of MGTV and our ITFS partners, I feel that would be a serious mistake.

Sincerely,

On behalf of Michigan Government Television

A handwritten signature in black ink, appearing to read "Bill Trevarthen", written in a cursive style.

Bill Trevarthen
Executive Director