

American Association of School Administrators

April 16, 2001

Federal Communications Commission
Commissioner Michael K. Powell, Chairman
445 12th Street, SW
Washington, DC 20554
Attn: Office of the Secretary

Re: ET Docket No. 00-258

Dear Chairman Powell:

On behalf of more than 14,000 school superintendents and school system leaders, I would like to express our satisfaction with the Final Report released on March 30, 2001. This report clearly signals the FCC's understanding the complex and evolving system that has developed out of the ITFS spectrum. For the reasons presented in the Final Report and ones AASA has provided in previous filings, we urge that the ITFS spectrum no longer be considered a viable option for 3rd Generation Cellular rollout.

The ITFS system has matured into an integral element of classroom instruction across the country. From the Central Dakota Telecommunications Consortium providing foreign language instruction and Cisco certification classes to students across North Dakota to the Greenbush Interactive Distance Learning Network with educational programming to over 49 sites in eastern Kansas; the ITFS system provides new levels of instruction to rural areas. As President Bush's education agenda continues to focus on increased performance by school districts and students, rural schools can not lose out on their opportunity to provide advanced classes. In addition, the Interim Report on the 2500 – 2690 MHz made very clear that the current ITFS spectrum may be the only source of broadband internet access available to rural areas.

The ITFS system is not just thriving in rural areas, but is on the cutting edge in many of our inner cities. The Region IV Education Service Agency in Houston, Texas provides ITFS services to over 54 schools in the Houston area. They are transforming to two-way digital access with the help of their MMDS partner. These partnerships are essential to the continuation of a successful ITFS system. Many of the MMDS partners are providing the essential technology to continue the growth of this system. If the ITFS system is relocated to another portion of the spectrum, our commercial partners have made it clear that they will not move with us and without their participation the system would collapse. While relocation fees could pay for the initial move, it would not be enough to keep the system going without our MMDS providers.

On behalf of the American Association of School Administrators, I urge you to pay heed to the recommendations made in the Final Report. We also urge a decision be made as

soon as possible. With the future of the ITFS system in flux, growth is stalled across the country. Many school districts are in the process of renegotiating contracts with their MMDS partners and will not complete the negotiations until a final decision is made concerning the licenses.

Thank you very much for your consideration.

Sincerely,

Paul D. Houston
Executive Director