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**Central Dakota Telecommunications Consortium**

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April 12, 2001

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FCC MAIL ROOM

Federal Communications Commission  
445 12th St., SW  
Washington, DC 20554

Re: FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911

Dear Chairman Powell:

I am concerned about the future of the ITFS spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. Although your Final Report, dated March 30, 2001 and titled "The Potential for Accommodating Third Generation Mobile Systems" reflects favorably on ITFS I want to reiterate how important this spectrum is to us.

In 1994 Central Dakota Telecommunications Consortium (CDTC) established a two-way Interactive Television (ITV) system that transmits live, high quality audio and video between several schools at once. An instructor at one school can interact and receive questions from students at any of the other schools, which are separated by as many as 150 miles. Twelve ITFS channels are used two at a time to bring each school district 16 courses daily. An additional three channels are shared with a wireless cable television company called Central Dakota Television, in exchange for the tower space needed to broadcast the educational programming.

North Dakota school districts are finding it increasingly difficult to find teachers to provide students with courses in foreign language, upper level mathematics, psychology, sociology, art, vocational agriculture and consumer and family sciences. Individual districts are often too small to support a full-time position in these field, and districts are forced to cut staff or drop the subjects entirely. ITFS has allowed districts to "team-up" in hiring full-time teachers and provide students access to quality instruction in a number of districts at the same time. Additionally, this technology keeps good teachers teaching in North Dakota, rather than relocating to other areas in search of full-time work.

Broadband access is usually impossible to implement due to the rural location and small size of individual schools and communities. CDTC and Central Dakota Television are working together on a plan to use additional ITFS spectrum to offer wireless broadband to our member schools as well as hundreds of underserved rural families in the area.

I hope that you will support us in maintaining the integrity of our spectrum, and in keeping this tremendous educational resource alive and well.

Sincerely,

Kathy McCracken, Coordinator  
Central Dakota Telecommunications Consortium

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