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Docket No. 00-258

STATE OF MISSISSIPPI

OFFICE OF THE GOVERNOR
DIVISION OF MEDICAID

WILLIS WASHINGTON, JR.
EXECUTIVE DIRECTOR

March 12, 2001

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MAY - 9 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Commissioner Harold W. Furchtgott-Roth
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

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

Dear Commissioner Furchtgott-Roth:

I am concerned about the future of the Instructional Television Fixed Service (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. The **Mississippi EDNET Institute** and its ITFS spectrum play an important part of the Division of Medicaid's effort to serve the citizens of Mississippi. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only in urban areas but also in many rural areas throughout the state of Mississippi.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition , fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

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Suite 801, Robert E. Lee Building, 239 North Lamar Street, Jackson, MS 39201-1399, (601) 359-6050

ITFS does not only benefit schools, students and adult learners, however. In addition to the broad range of community programming currently carried on ITFS spectrum, the recent two-way order h as filled a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless communications companies, ITFS spectrum is being used to bring broadband to under served populations, in rural, urban and otherwise isolated communities nationwide. Mississippi's ITFS licenses have more complete coverage than any state in the country, while Mississippi has the greatest distance to travel to bridge the digital divide. As stated by Mississippi Governor Ronnie Musgrove in a recent report "Creating Economic Prosperity for a New Century", our state intends to fully utilize these ITFS licenses to provide available, affordable Internet access in rural areas to both small businesses and to homes. ITFS licensees are therefore serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational i9nstitutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. In either scenario, the ITFS community would be incapable of supporting advanced wireless services and promotion the development of broadband services to the educational community and to under served communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. We hope that you will support us in maintaining the integrity of the spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

Rica Lewis-Payton

RLC:TC:lpl