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May 8, 2001

Chairman Powell
Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Tristani
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

00-258

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Dear Commissioners:

I am concerned about the future of the ITRFS spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. ITFS is an important part of our educational program at Wayne County Regional Educational Service Agency. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only for our students but also for our entire community.

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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THE WAYNE COUNTY REGIONAL EDUCATIONAL SERVICE AGENCY
Board of Education • Boyd W. Arthurs • James S. Beri • Mary E. Blackmon • Kathleen M. Chorbagian James Petrie • Marlene E. Lewis, Superintendent

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 has 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 underserved populations in rural, urban and otherwise isolated communities nationwide. 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 ITPS 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 institutions 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 promoting the development of broadband services to the educational community and to underserved communities nationwide.

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

Sincerely,

Sally Vaughn

Sally Vaughn, Ph.D.
Associate Superintendent for Learning Services

SV/gh