Dear FCC:

Comments to the FCC on the "Wireless Telecommunications Bureau Seeks Comment on Proposal to Revise Multichannel Multipoint Distribution Service and the Instructional Television Fixed Service Rules"

This response is being submitted by Colorado State University, an ITFS licensee in north central Colorado. Specific comments on the proposed plan follow.

1. In general, we highly favor the proposed plan, and believe that it will facilitate expanded deployment and use of broadband services, while preserving current broadcast programming.

2. In addition, it is our opinion that mobile, broadband services will be used much more widely for education than are our current broadcast ITFS services. Indeed, for the last several years many of the University's off-campus users of our modem pool have been requesting that we deploy higher-speed broadband services for their use and we have heretofore lacked a technological means to do so. The proposed mobile broadband service should be ideally suited for this purpose, and might even be a more attractive "roaming" alternative on campus than our current 802.11b deployment, especially if deployed in a local, cellularized fashion.

3. Furthermore, many of the University's off-campus users do not today have broadband services available to them. Cable modems are not available outside of the immediate metropolitan area of Fort Collins, and due to distance limitations, DSL offers limited ability to serve our users (the most recent survey indicated that DSL would serve at most only 17% of University off-campus users, and many of these only at lower speeds). Wireless will be of immediate benefit to many users who desire broadband access but who now lack the required supporting infrastructure.

4. Additional opportunities and competition for broadband services will benefit the University's users. Cable Internet prices are not regulated and have been rising out of control, at almost ten times the annual rate of inflation. DSL on the other hand, is reasonably affordable only at low speeds, e.g. 256 kbps, and this is too slow for many modern applications.

5. We especially favor the addition of mobile services, and think that the extension of services to roaming will both fill a technological gap and will be very attractive to users.

6. We also favor the simplified administrative procedures and believe that will facilitate deployment, sustenance and natural evolution of the services.

7. However, we believe that there are issues that still need to be addressed before final approval of any plan is adopted. These include:

a. While it is very attractive to draw the boundaries drawn between service areas as proposed in Appendix A, an engineering review to assess interference issues and determine overall the feasibility and

advisability of the plan should be accomplished.

b. It is unclear who gets to be a "Proponent" and deploy services in each area. What are the criteria for becoming a Proponent? What if more than a single entity wishes to become a Proponent? How are disputes resolved?

c. Much of the proposed plan relies on new technology being developed. While we realize that the may be a "chicken and egg" scenario, we believe that an engineering review should be done to assess the likelihood of appropriate and affordable technology being developed.

In summary, we highly favor the plan, and believe that it will substantially enhance our educational mission and benefit the citizenry. We would look forward to deploying the technology either through a partner, or by ourselves for our users. Indeed, we have four geographically disparate campuses in the Fort Collins area that could be used to deploy mobile IP services, and would anticipate deployment at all four sites.