

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

NOV 14 2002

In the Matter of)
)
Proposal to Revise Multichannel Multipoint) RM-10586
Distribution Service and the Instructional)
Television Fixed Service Rules)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Wireless Telecommunications Bureau

COMMENTS OF ARCHDIOCESE OF LOS ANGELES

The Archdiocese of Los Angeles Education and Welfare Corporation ("Archdioces") submits these comments in support of the proposal ("Proposal") submitted by the Wireless Communications Association International, the National ITFS Association, and the Catholic Television Network to change the rules governing the Multichannel Multipoint Distribution Service ("MMDS") and the Instructional Television Fixed Service ("ITFS").¹ The revised rules would result in more streamlined licensing for MMDS and ITFS licensees, encourage the deployment of new wireless broadband services, and enhance the availability and usefulness of educational services across the United States.

The Archdiocese of Los Angeles is the largest archdiocese in the United States serving approximately 5 million constituents in three Southern California counties covering 8000 square miles. The Archdiocese's school system is comprised of 278 schools, and is one of the three largest school systems in the state of California. The Archdiocese has been using ITFS frequencies since 1967.

¹ See "Wireless Telecommunications Bureau Seeks Comment on Proposal to Revise Multichannel Multipoint Distribution Service and Instructional Television fixed Service Rules," *Public Notice*, D.4 02-3732 (rel. Oct.17. 2002).

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Initially, the Archdiocese had four analog ITFS channels, which were used to capacity for educational programming. Over time, as the demand for distance learning increased, the Archdiocese added two additional analog channels. In 1996, with the help of its commercial partner, the Archdiocese's channels were converted to digital operation.

Today, the Archdiocese uses ITFS channels to provide educational programming to over 50,000 students. Teachers have access to a wide variety of courses including science, language arts, math, social studies, religion/values, technology, art, and physical education. Approximately 100 of the Archdiocese's schools are located in inner-city communities, and are struggling financially. These schools have a significant number of students from multi-ethnic backgrounds.

The Archdiocese has learned that integrating technology into the classroom helps to fine-tune the curriculum to meet the individual learning styles of different students. For this reason, the Archdiocese supports the Proposal because it provides a framework to protect existing ITFS operations while, at the same time, opening up the spectrum for a host of new two-way, interactive broadband services. These new services are vitally important, and will further our ability to serve teachers, students and others in the community.

The Proposal was the result of significant work by numerous ITFS and MMDS licensees, engineers, equipment vendors, and others with differing interests and perspectives. The Archdiocese urges the Commission to move swiftly to issue a Notice of Proposed Rulemaking in response to the Proposal so that others will have an opportunity to comment and new services can be deployed at the earliest possible time.

Respectfully submitted,

THE ARCHDIOCESE OF LOS ANGELES
EDUCATION AND WELFARE CORPORATION



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November 14, 2002