

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

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Wireless Telecommunications Bureau

COMMENTS OF DIOCESE OF ORANGE

The Diocese of Orange (“Diocese”) 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”).’ 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 Diocese of Orange serves approximately 2 million people, and provides instructional programming to over 18,000 students in 36 schools and parishes throughout Orange County, California. The Diocese started using ITFS channels in 1983

The Diocese uses ITFS channels to deliver pre-recorded instructional programming to students throughout Orange County in courses such as health, science, math, history and art. The Diocese’s programming encompasses every subject for every grade level. In addition, live

¹ See “Wireless Telecommunications Bureau Seeks Comment on Proposal to Revise Multichannel Multipoint Distribution Service and Instructional Television Fixed Service Rules,” *Public Notice*, DA 02-2732 (rel. Oct.17, 2002).

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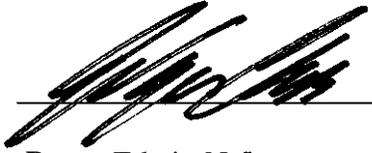
broadcasts in English, science and teacher professional development are broadcast to K-12 schools for interactive participation using a telephone callback for audio. In the evenings, when its ITFS frequencies are not being used for educational programming, the Diocese broadcasts inspirational and educational programming aimed at adults. In addition, religious services and other events of importance to the community are broadcast live.

The Diocese 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 conversion to two-way broadband will allow the Diocese to offer high-speed Internet access and other data services to its schools. The alternative would mean wiring historical old mission buildings and paying monthly charges to a telephone or cable company for broadband Internet access. This option is costly and would delay the introduction of new educational tools into the Diocese's curriculum. **Also**, some of the Diocese's schools are located in poor neighborhoods and do not have the necessary funds to provide courses that are critical to a young student's development. Two-way services can be used to create a virtual classroom in which students in schools without such courses can participate in a class with students in schools that do have such courses available.

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 Diocese 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 DIOCESE OF ORANGE



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