

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Revision of Multichannel Multipoint
Distribution Service and Instructional
Television Fixed Service Rules

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RM-10586

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Wireless Telecommunications Bureau

COMMENTS OF THE ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE

The Roman Catholic Diocese of Rockville Centre ("Diocese") hereby submits these comments in support of the proposal ("Proposal") submitted by the Wireless Communications Association International, Inc., the National ITFS Association, and the Catholic Television Network to amend the rules governing the Multichannel Multipoint Distribution Service ("MMDS") and the Instructional Television Fixed Service ("ITFS"). The revised rules set forth in the Proposal would result in more streamlined licensing for MMDS and ITFS licensees, encourage the deployment of new wireless broadband services, and enhance the availability of educational services across the United States.

The Diocese is the eighth largest Catholic Diocese in the United States, serving Nassau and Suffolk Counties on Long Island, New York. The Diocese serves 1.4 million Catholics, which is roughly half the population of Long Island. Presently, the Diocese is the licensee of the A-group, B-group, E-group and G-group channels on Long Island.

The Diocese started using ITFS channels in 1969, when a distance education network was constructed on Long Island to improve the quality of education for students in elementary

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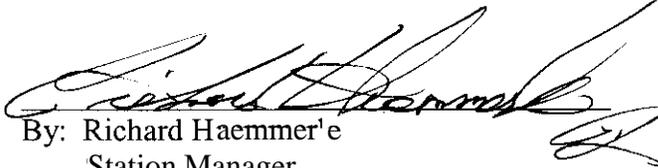
and high schools. Today, the Diocese's ITFS channels are used full-time during the day to educate 40,000 students in Nassau and Suffolk Counties. The channels are also used to transmit on-demand instructional programming, in-service teacher training, family-value programming, and other services to schools, hospitals and other institutions. In addition, the channels are used to provide targeted programming to meet the needs of the large Hispanic community on Long Island. The Diocese also uses its ITFS system to educate newer immigrants, guiding them on social service issues, as well as health, housing and legal matters

The Diocese supports the Proposal because it provides a framework to protect existing ITFS operations, while at the same time opening up the ITFS 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 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 that new services can be deployed at the earliest possible time.

Respectfully submitted,

ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE


By: Richard Haemmerle
Station Manager

November 14.2002