

RE: Reply Comments for Proceeding #03-66

On behalf of the Huntsville City Schools' ETV Center, we are writing about an issue of tremendous importance to our community, the Instructional Television Fixed Service (ITFS) spectrum. As you know, the ITFS is a distance learning technology that has provided educational services to students and teachers since the 1960's. The Huntsville City Schools' ETV Center has been an ITFS licensee since 1966 and the services provided using ITFS are an essential part of our education program, serving over 23,000 students, providing programs in a variety of subjects, etc. and serves as a link between our distance learning classrooms. Therefore we oppose aspects of the Federal Communication Commission's (FCC) Notice of Proposed Rule Making (NPRM) and Memorandum Opinion and Order, FCC 03-56, in WT Docket No. 03-66, et al., released April 2, 2003 which propose to fundamentally alter the character of the ITFS as an educational resource.

Specifically, Huntsville City Schools' ETV opposes the proposal to eliminate the requirement that ITFS licensees provide educational services and to permit ITFS licenses to be acquired by commercial entities. This represents an attack on this critical educational and public interest resource and defeats the purpose that these frequencies were established for. These proposals open the door for commercial entities to acquire ITFS licenses and eliminate educational activity in the 2.5 GHz band.

Huntsville City Schools' ETV provides four closed circuit channels of educational programming every day during the school year. Each channel provides shows in a different subject area (Channel 7 – Reading and Language Arts; Channel 9 – Special Events and Staff Development; Channel 11 – Math, Science and Technology; and Channel 13 – History and Current Events). ETV also operates a 24 hour cable access channel and uses the ITFS to aid in that effort. Our cable channel broadcasts school announcements, live school board meetings, and other educational programs of community interest. We also provide a link between our distance learning classrooms to those schools which do not have a distance learning lab.

Therefore, if the FCC eliminates the requirement that ITFS licenses provide educational services and/or permits licenses to be acquired by commercial entities, our capacity to provide these essential educational services in Huntsville, Alabama will be significantly diminished. An integrated system that has taken years to develop could be silenced. In either scenario, we fear the FCC proposal would open the door to commercial enterprises

slowly acquiring more and more of these educational licenses. Congress has specifically stated that ITFS is intended for educational purposes in the public interest.

If the ITFS spectrum is compromised in any way, our daily educational programming, our system-wide link with the distance learning classrooms, live broadcasts of school board meetings, and other vital programs would be lost. Because we believe this will cause irreparable harm to this valuable public resource, Huntsville City Schools' ETV is strongly opposed to both the FCC proposal to eliminate the educational requirement on ITFS licenses and the proposal to allow ITFS licenses to be sold to the highest commercial bidders. Thank you.

Sincerely,
Keith Ward
Director of ETV
Huntsville City Schools