PACE Telecommunications Consortium

Providing Academics Cost Effectively
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October 21,2003

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S. W.
Washington, D. C. 20554

Re: Comment and Reply Comments
WT Docket No. 03-66 (RM-10586)
WT Docket No. 03-67
MM Docket No. 97-217
WT Docket No. 02-68 (RM-9718)

Dear Ms. Dortch:

Providing Academics Cost Effectively Telecommunications Consortium. (PACE) submits its Comments and Reply Comments in this proceeding to address significant issues impacting the future of Instructional Television Fixed Service (ITFS).

PACE is a consortium of 21 school districts, 2 Intermediate school districts and a junior college located in the northern lower peninsula of Michigan. Our licensed ITFS channels have been in operation since 1986 providing necessary educational curriculum to children, adults, special needs and seniors throughout our extensive 6 county region. Our licensed eight (8) channel system is completely operated and funded by funds from state, federal and local taxpayer dollars We were one of the first in the state to utilize talkback channels (I group) to allow interactive correspondence from the end user to the instructor. This service proved to be very successful upon our deployment and provided the missing link for two-way interactivity.

Today, PACE still provides interactive classes and educational programming to all of it's districts and has also deployed broad-band, high speed wireless Internet to 18 of the 21 districts, (30,000 + students) 2 intermediate districts (250 + teachers and administrators) and several other government and educational entities.

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Without the use of High-Power channels, our system would not be as effective in covering the large geographic area necessary to reach the educational entities listed and would cost the tax payers a much greater amount to achieve the same goals.

Since our inception in 1986, PACE has grown leaps and bounds in providing educational programming to the northern lower Michigan area. Thousands of Students, teachers, seniors and people of all rely on PACE to provide low cost, quality educational programming and services.

Pace would like to recommend the following;

- PACE urges the Commissioners to consider only those changes that offer flexibility in the use of the spectrum for educational purposes and avoid unnecessary delays in the issuance and maintenance of licenses.
- PACE urges the Commissioners to protect the ITFS band for educational use and not commercial use.
- PACE agrees there has been concern from some about the portion of the spectrum the NIA/WCA/CTN paper recommends holding for high power transmission. PACE concurs with the coalition's position. While streamed video may well be the wave of the future and is currently used on limited basis, it would be a substantial disservice to deny traditional television transmission, either analog or digital, for the scores of schools, colleges, and universities that today rely upon it for distance education. Schools have an investment in equipment and personnel. With budgets strained it would not serve the public interest at this time to deny a continuation of those services.
- PACE urges the Commissioners to consider opening a filing window which will allow educational entities to apply for much needed additional bandwidth to meet the educational needs of it's constituents.

In summary, Pace urges the Commissioners to make wise decisions that will still allow Instructional Television Fixed Services (ITFS) to provide our children of today the needs for tomorrow.

Sincerely,

James Mick

Superintendent, PACE Telecommunications Consortium