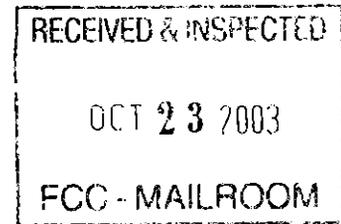




COMMUNICATIONS GROUP

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Secretary, Federal Communications Commission  
The Portals, 445 12th Street  
S W , Washington, D C  
20554

10/14/03

Reference FCC's Docket No 03-66, RM-10586

Dear Commission,

The University of Arizona hereby expresses our support of the coalition proposal and other matters pertaining to the arguments being made by the NIA and CTN relating to the RM-10586

The University of Arizona and its public broadcasting and educational telecommunications unit, KUAT Communications Group, operate and maintain both MDS and ITFS frequencies in Tucson, Arizona for the benefit of educational services from the university and Pima Community College

Valuable educational services provided by ITFS channels include distribution of graduate level engineering and optical sciences classes to Raytheon, IBM and Texas Instruments. The frequencies also serve 25,000 students in 35 K-12 schools, in addition to hundreds of University and community college students each semester. The system is used to link the medical staff at seven Tucson area hospitals and at the Federal prison in Tucson, as well as numerous doctors in private practice, to medical lectures and courses.

The University has an excess capacity agreement with a subsidiary of Sprint, and the system also enables PCTV to serve over 20,000 subscribers to its video/data system in Tucson, making both their commercial service and educational for credit courses, including those leading to a GED, and professional training available to the public in their homes. The University and Sprint, working together, have rolled out high speed Internet access services for education and for the public, making Tucson one of the early successes in two-way fixed wireless broadband.

Our future plans are to offer more content from the University of Arizona via two way wireless broadband services to students, faculty and staff.

The University of Arizona strongly supports the coalition's original proposal and we are strongly opposed to the proposal to convert the entire band to low power operations. We support the original proposal set forth in the White Paper, to segment the ITFS/MDS

THE UNIVERSITY OF ARIZONA,  
TUCSON, ARIZONA 85721-0076

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band into three segments, the lower and upper band segments, which would be for low power cellularized operations, and the mid-band segment, which would be composed of seven 6 MHz channels that would continue to be available for big stick, high power operations typically now used for video services

The University of Arizona also opposes any effort to permit non-educators to be licensed on ITFS channels. We believe that such a move would result in the gradual destruction of the ITFS service across the country, as ITFS stations are sold off to commercial interests. The FCC's interest in full and effective utilization of ITFS channels can better be met through ITFS excess capacity leasing, in addition to the band plan technical changes put forward by the Coalition.

We hope the FCC will approve the original Coalition proposal to allow us to continue serving the constituents of southern Arizona.

Respectfully,



Joe L. Chitwood

Assistant General Manager, UA Channel/KUAT MultiMedia

KUAT Communications Group

University of Arizona