

June 1, 2004

The Honorable Michael Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Amendment of Parts 1, 21, 7, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands – WT Docket No. 03-66*

Dear Chairman Powell:

On behalf of ITFS licensees in South Dakota and in concert with the unprecedented support from schools and educational associations across this nation, I am writing to express serious concerns regarding proposed changes to the Commission's rules regarding ITFS spectrum.

As a leader in the educational technology arena in South Dakota, we at Lake Area Technical Institute are acutely aware of the need to preserve the ITFS spectrum so that educational entities can fully utilize the resources at their disposal to improve academic achievement. Activities made possible by the ITFS spectrum, including distance learning programs, interactive instruction, electronic field trips, video on-demand services to classrooms, job site training, and wireless services are critical tools in enhancing student learning, especially for those students in rural communities that rely heavily on ITFS for distance education programming.

Educational institutions in South Dakota and throughout the United States have for many years used ITFS channels to transmit instructional programming to students at all levels, from grade school through graduate school and to the workplace. The allocation of ITFS spectrum for educational purposes has been a valuable resource to America's educational institutions.

Millions of learners across the country rely on ITFS for access to critical educational services. As the cost of education and training continues to increase in this difficult budgetary era, the resources that institutions can provide through ITFS systems are essential in keeping the quality of education high, and ensuring that every learner has access to the resources necessary to excel.

As you know, ITFS is the only spectrum specifically allocated to formal education, and I am writing to request your support in protecting this vital educational asset. As the FCC updates the technical rules for ITFS to more effectively support a range of new broadband services, **I urge you to reject proposals to allow any ITFS spectrum to be sold to commercial entities, or to reduce the total amount of spectrum allocated to ITFS.** Loss of this spectrum would be a terrible blow to the American education community.

The possibilities for future development of educational services in the ITFS band are exciting. South Dakota ITFS licensees plan to use their spectrum to the fullest extent after the adoption of new technical rules. But these efforts could be fatally jeopardized if the spectrum is opened up to commercial entities or is reduced in size. This would seriously hamper our educational institutions ability to develop advanced technologies for educational outreach to rural and other traditionally underserved populations, and to a student base that is increasingly relying upon distance learning as an important method of obtaining vocational and college education.

I urge you to reject proposals that would reverse forty plus years of FCC policy, which placed a high-importance on maintaining a spectrum reserve for education, and now would allow ITFS spectrum to be licensed to commercial entities, or to reduce in any respect the total amount of spectrum allocated to ITFS.

Thank you for your consideration of this important matter.

Sincerely,

Gary Williams
Director
Lake Area Technical Institute

cc: Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Commissioner Jonathan S. Adelstein