



STANFORD UNIVERSITY
OFFICE OF THE PRESIDENT

JOHN L. HENNESSY

June 1, 2004

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

RE: WT Docket No. 03-66

Dear Chairman Powell:

For over 30 years, the Stanford University has used Instructional Television Fixed Service ("ITFS") channels in the 2.5 GHz band to transmit instructional programming. Stanford is currently transmitting instructional coursework over five 6-MHz ITFS channels. Stanford makes full use of its spectrum allotment and transmits more than 350 hours of programming per week covering hundreds of courses, primarily addressing engineering and scientific subjects. The Stanford Instructional Television Network ("SITN") supports degree and non-degree programs. In addition to the instruction of Stanford students, SITN also reaches over 6,000 industry students in 250 graduate courses and programs. SITN customers total over 150 businesses, and include prominent firms such as Cisco Systems, IBM, Lockheed Martin, Motorola, Oracle, Sun Microsystems, Hewlett Packard, Microsoft, NASA, Sandia, Yahoo and Lawrence Livermore Labs.

We understand that a proposal from the Wireless Telecommunications Bureau is being circulated for rushed FCC consideration that would eliminate the eligibility restrictions on ITFS spectrum and that would reduce the amount of spectrum held by each ITFS licensee in order to accommodate new commercial users in the band. Reduction in the amount of spectrum available to SITN for instructional transmissions would substantially impair the ability of SITN to deliver the valuable services it provides today. This would, in turn, adversely affect thousands of individuals and companies in the San Francisco Bay Area that rely on SITN for training and degree programs in areas critical to the future of U.S. industry. SITN's ITFS network is not immediately replaceable with other forms of technology for delivery of interactive classroom instruction. Attempting to serve our clients through other means or with less spectrum would create an immediate and unfunded financial burden. Moreover, Stanford feels that to take such an action would constitute unfair treatment to those entities that have fully utilized their spectrum allotment for the public benefit and in accordance with the FCC's stated policy mandate.

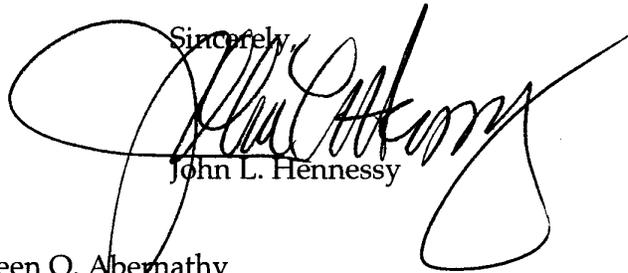
Honorable Michael K. Powell, Chairman
June 1, 2004
Page 2 of 2

ITFS is the only spectrum specifically allocated to support formal education. This vital educational asset must be protected, as the FCC promised to do just three years ago. As the FCC updates the technical rules for ITFS to more effectively support a range of new broadband services, we urge you to reject proposals to allow any ITFS spectrum to be licensed to commercial entities or to reduce in any respect the total amount of spectrum allocated to ITFS. If necessary, you must delay consideration of the proposal to a later meeting, so that you can get a complete picture of how these proposals would affect ITFS.

Even if these proposals move forward, we urge you to preserve indefinitely the ability of ITFS licensees such as Stanford to continue providing instructional programming at the levels that they currently provide. Preserving Stanford's existing ITFS program would clearly serve the public interest.

The possibilities for future development of educational services in the ITFS band are exciting, and we plan to use the spectrum fully in the years ahead. I hope that you will support our efforts to keep this valuable educational resource. Thank you for your consideration of this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John L. Hennessy", is written over the word "Sincerely,". The signature is fluid and cursive, with a large loop at the end.

John L. Hennessy

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