OFFICE OF THE SUPERINTENDENT

Richardson Independent School District

May 24, 2004

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

RE: WT Docket No. 03-66

For many years Richardson Independent School District has used Instructional Television Fixed Service ("ITFS") channels in the 2.5 GHz band to transmit instructional programming to students in our schools. The advent of new technologies and the prospect of band plan and rule changes requested by the ITFS community promise new digital educational services that will enhance our service to students and the community.

We understand that a proposal from the Wireless Bureau is being circulated for rushed FCC consideration that would eliminate the eligibility restrictions on ITFS spectrum, and would reduce the amount of spectrum held by each ITFS licensee in order to accommodate new commercial users in the band. This proposal is seriously flawed.

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 misguided 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 our concerns can be heard.

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,

Dr. Carolyn Bukhair
Superintendent
Richardson Independent School District

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

400 S. Greenville Avenue • Richardson, Texas 75081-4198 • 469-593-0400 • Fax 469-593-0402