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June 9, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: WT Docket No. 03-66

EX PARTE NOTICE

Dear Ms. Dortch:

On June 8, 2004, the undersigned participated in a telephone conference at the request of Barry Ohlson, Senior Legal Advisor to Commissioner Jonathan S. Adelstein, to discuss the positions of Stanford University on certain issues in the above-referenced docket.

Specifically, I explained that Stanford University needs access to its current ITFS spectrum assignments to continue its ongoing instructional programming to the university and businesses in Palo Alto and the San Francisco Bay Area. If access to those spectrum assignments were changed, Stanford would require substantial time to transition the Stanford Instructional Television Network to another configuration. A "transition" away from the current configuration implicates two issues: comparable facilities and timing.

I noted that, in terms of alternative technologies, Stanford has previously explained that delivery of real-time, interactive instructional programming over the Internet is not currently feasible, and would probably not be available for at least another five years. If the Commission were to require Stanford to lose access to its current facilities, then the Commission should ensure that Stanford is provided comparable facilities to continue its ongoing educational mission that is served by the Stanford Instructional Television Network, and sufficient time to transition its programs and customers to a new configuration.

In its comments filed (jointly with Northeastern University) on September 8, 2003 in this docket, Stanford suggested that any transition to a new band plan should allow four years to develop the band plan configuration and station modifications for each market and then a period of three years for licensees to

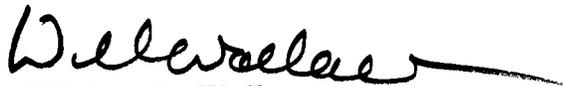
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transition from existing operations to operations consistent with the new band plan and modified facilities.

I also explained that Stanford's Station KGG-38 operates as a grandfathered ITFS station on the E-Channel Group. Stanford has cooperated with the licensee of the commercial E-Channel Group in the same geographic area to enable both stations to operate without harmful interference. I noted that the ability of both a grandfathered ITFS station and a commercial MMDS station to operate on the same channels in the same geographic area depended upon their respective facilities, configurations and ability to work cooperatively.

Pursuant Section 1.1206(b)(2), this *ex parte* notice is being filed electronically in WT Docket No. 03-66.

Respectfully submitted,


William D. Wallace

cc: Barry Ohlson