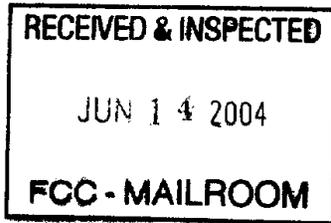


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THE NATIONAL CONFERENCE ON CITIZENSHIP

Suite 800 1300-19th Street Washington, DC 20036



A. G. Newmyer III
Manager
202/778-0448

June 8, 2004

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

Re: WT Docket No. 03-66

Dear Mr. Chairman:

The National Conference on Citizenship is a federally chartered corporation whose mission is to encourage a more active and engaged citizenry. NCoC was founded in 1946 to sustain the spirit of cooperation that bound citizens together during World War II. NCoC was granted a federal charter by a unanimous vote of the Congress in 1953. NCoC has been the licensee of multiple ITFS stations for many, many years and remains an active innovator in developing uses of this spectrum for educating the American citizenry.

NCoC has supported a recent coalition proposal for specific rule and band plan revisions that would increase its ability to provide new instructional and broadband services in satisfaction of its educational mission. However, NCoC has been made aware that the Wireless Telecommunications Bureau is circulating a draft Order for consideration by the Commissioners that would eliminate certain eligibility restrictions on ITFS spectrum, and would reduce the amount of spectrum held by each ITFS licensee in order to facilitate relocation of certain commercial licensees recently displaced from their channels in the 2.1GHz band and provide additional spectrum for auction to new commercial users in the band. This proposal differs from that which was jointly proposed by the industry and from the proposals put out for comment by the FCC in its Notice of Proposed Rulemaking and therefore raises serious concerns.

ITFS is the only spectrum in the United States exclusively allocated to support formal education and instructional programming. This unique educational tool serves a vital function and accordingly has been protected and preserved by the FCC over the years. In fact the FCC recently resisted pressure to reallocate this spectrum to 3G service use. Following that FCC decision, in an unprecedented show of cooperation, a consortium of commercial and educational licensees along with numerous wireless operators set out a proposal to modify the rules in such a manner as would allow the present licensees to develop this spectrum for mobile broadband wireless use on a voluntary and cooperative

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basis. This proposal provided for more flexible cooperative use of the band, while preserving this valuable educational resource and guaranteeing the continued existence of traditional ITFS services. **Accordingly we implore the Commission to reject any proposal that would open the licensing eligibility requirements for the ITFS spectrum to commercial entities or would in any way diminish the amount of ITFS spectrum reserved and licensed exclusively to schools and not for profit educational entities.**

NCoC is excited about exploring the applications of new broadband services to its educational mandate, and hopes that the Commission will facilitate such services while carefully preserving this unique and valuable educational resource. Thank you for your consideration of this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. G. Newmyer III', with a long, sweeping horizontal stroke extending to the right.

A. G. Newmyer III
Manager, NCoC

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