

I firmly believe the airwaves belong to the people. Spectrum is a natural public resource. The federal government handed most of the airwaves out decades ago for free, with the expectation that they'd be used to inform, educate and enrich the public. Instead they are mostly used to line shareholder pockets at the largest media and telecom companies.

There are a few exceptions; personally I have benefitted greatly from both public television and public radio. EBS is another one of those exceptions. While it hasn't had nearly the impact of public TV and radio, that is primarily because of poor management of the band by the FCC, not a lack of need.

While I work for a collaboration of five EBS licensees, I submit these comments as a private citizen. One who is concerned about the numerous decisions this FCC is making that favor corporations over the public. In that vein, I am quite distressed over the recent NPRM dealing with EBS. It seems that in today's increasingly spectrum hungry world, the educational value of the 2.5 band is being weighed against its economic value – but the FCC has their finger on the scale. FCC rhetoric indicates that the educational value is clearly not understood and that the current FCC has no interest in acknowledging how the work of previous Commissioners has greatly limited the potential impact of EBS.

In fact, the current Commission claims that EBS is a “charade.” But allowing EBS licensees to lease their excess capacity to raise revenue for education and the community is precisely what the FCC intended when it created this public-private model. The leasing of EBS spectrum provides schools and nonprofits with affordable internet accounts, as well as money to invest in their schools and communities. The current Commissioners may not agree with how that money is invested in education or in the community, but they are wrong to say it is not invested at all. And certainly it is disingenuous to imply that current licensees are to blame for the shortcomings of EBS. The Commission has no one but themselves and the ghosts of Commissioners past to blame for any failures of EBS.

EBS does good. People are helped by it. Please take time to understand this. And instead of throwing the baby out with the bathwater, revise the rules. Modernize them. Expand the benefits. Allow schools and nonprofits the opportunity to deploy broadband networks aimed at addressing the homework gap and invest in education in their communities. Build on what we have, don't burn it to the ground and start over. Please don't just give these airwaves to the highest bidder. Because evidence shows the commercial market will not invest in education and bridging the digital divide in any meaningful way.

Kristen Perry
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