

September 7, 2018

Views On Learning, Inc. (VOL) respectfully submits the following comments in response to the Notice of Proposed Rulemaking from Proceedings 18-120 entitled "Transforming the 2.5 GHz Band".

VOL is a 501(C)3 nonprofit organization, holding EBS licenses in 23 markets. The majority of those markets are rural areas with otherwise limited access to broadband and related services. Even though many of EBS license areas do not match the population centers, VOL has a history of supporting schools in those markets by providing bandwidth and related technologies that may not otherwise be available to them. That support goes well beyond simply providing bandwidth.

The NPRM recommends imposing a "Local Address" requirement for new licensing. VOL has been able, through aggregation of resources, to facilitate video conferencing services, granting of equipment, and sharing of content between schools in our markets. Holding licenses in multiple markets has been critical in allowing us to facilitate collaboration within and between our markets. There is an "economy of scale" that may not be as easy to achieve through "single local organization" license holders.

VOL supports the Commission's decision to initiate this proceeding which has the potential to facilitate 5G wireless deployments, extend broadband Internet access into underserved areas, and help bridge the digital divide. We are concerned that the NPRM, as presented, has the potential to eliminate education from the EBS spectrum completely. In releasing the NPRM, the Commission indicated its belief that the band has been underutilized. Imposing different educational use requirements on new licensees, while giving others the ability to sell licenses without any educational requirement, may further fragment spectrum that has been fragmented by the lack of a current licensing structure.

Views On Learning, Inc. generally supports the NEBSA/CTN, NACEPH/Mobile Beacon, and AESA comments regarding the NPRM and urges the Commission to specifically consider the following:

1. Existing Licenses and Leases Should Be Grandfathered to Avoid Disruption of Existing Educational Services. Any Changes in the Definition of "Local Presence" Should Not Impact Existing Licensees' Ability to Participate In GSA Rationalization or Render Them Ineligible to Renew Their EBS License Upon Completion of an Existing Lease.
2. EBS GSAs Should Be Rationalized to County Boundaries that Better Align With Existing Population Centers.
3. The Commission Should Preserve the Educational Value and Benefit of the EBS Spectrum by Retaining the Educational Eligibility Requirements for New and Existing EBS License Holders.
4. Educational Use Requirements Should Be Retained and Updated to Reflect Current and Future Use Models.
5. Educational Priority Licensing Windows Meet Statutory Requirements and Preserve the Educational Benefits of EBS. Auctions Disadvantage Smaller Educational Organizations with Limited Budgets, Denying Them an Opportunity to Obtain a License and Should Only be Used as a Last Resort.
6. The Definition of "Local Presence" Should Be Broadened to Include More than a Local Mailing Address.
7. The Commission Should Permit All Currently Eligible Organizations to Participate in the Educational Priority Filing Windows for New EBS Licenses.

Respectfully Submitted,

Views On Learning, Inc. Board of Directors
Les Turner, Secretary
56535 Magnetic Drive
Mishawaka, IN 46545
lturner@niesc.k12.in.us