

Township of Union Public Schools

The Presidential Model School District

Dr. James M. Caulfield
Superintendent of Schools

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October 12, 1993

Mr. William Caton, Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Reference: MM Docket Number 93-106

Dear Mr. Caton:

I'm writing as a wireless cable operator/educator and a partner with a major wireless cable commercial operator in the greater New York metropolitan area in support of the compromise forged between the Wireless Cable Association International and the National ITFS Association and the ITFS parties on the issue of channel loading.

It is the contention of the Union Township Board of Education and myself as Superintendent of Schools that channel loading will simplify the scheduling of educational programming by ITFS licensees. I do not believe there's any attempt to compromise the intent of the FCC in setting aside certain ITFS frequencies for use by educators.

As an ITFS licensee for the last 15 years and as a partner with a private sector wireless cable operator for approximately ten years, it is my belief that channel loading will permit the elimination of costly set-top boxes at each television set and will make it less costly for schools to make ITFS programming available on all sets within each receive site building. I further believe that such an arrangement as is proposed will minimize the interspersing of educational programming with commercial programming and, thus, reduce the risk that students will tune into inappropriate programming.

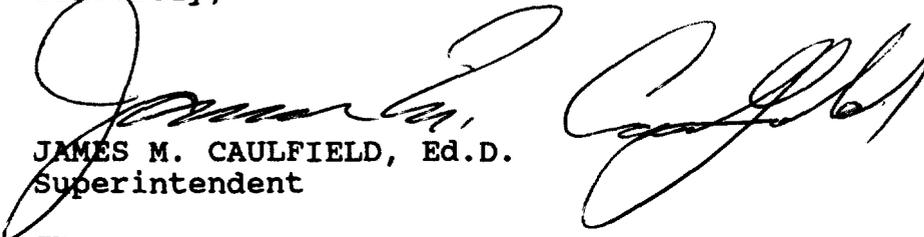
We presently receive approximately \$75,000 annually in revenue from our wireless cable partner. Any reduction in equipment costs related to channel mapping, and the increase in the number of full time channels available to the operator, will increase funding available to our Board of Education. With fiscal conditions being what they are, we are anxious for any increase in revenue from the wireless cable operator.

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I'm delighted at the effort being made by the FCC to work out arrangements to enhance educational programming and increase revenues to the district. It may be of interest to know that virtually the only non tax money received by a district is through fees received by school districts who are the holders of ITFS licenses. Several million dollars are, thus, made available to school districts throughout the United States, including Union. Our revenues are directed to the maintaining of a full service studio with instruction being provided to approximately 70 high school students whose career interest is Communication Arts.

Continued success in your work.

Sincerely,



JAMES M. CAULFIELD, Ed.D.
Superintendent

JMC:ps