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October 22, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYFederal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: MM-Docket No. 93-106 /
Amendment of Part 74 of the Commission's Rules
Governing Use of the Frequencies in the
Instructional Television Fixed Service

Dear Sir/Madam:

As a school district seeking to provide educational programming in central Texas through the FCC's Instructional Television Fixed Service, we are writing in support of the compromise agreement filed on August 19, 1993 by the Wireless Cable Association International, Inc. (WCA), the National ITFS Association (NIA), and a group of educators called the "ITFS Parties".

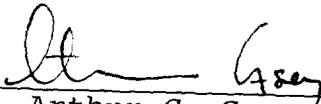
We submit that until digital compression technology provides a technical solution to spectrum scarcity in the Instructional Fixed Television Service (ITFS), the use of channel loading techniques will best foster the primary purpose of ITFS - the presentation of educational programming for instructional use - by providing wireless cable operators the incentive to invest in ITFS facilities and form partnerships with educators. Further, channel loading permits efficient use of spectrum without the need for prohibitively expensive channel mapping equipment.

With respect to the referenced compromise agreement, we support all features of the agreement. First, we agree that each ITFS licensee should be required to preserve for immediate use or ready recapture at least 40 hours per channel per week for the transmission of ITFS programming. Second, we support the requirement that ITFS licensees must actually transmit at least the minimum required ITFS programming of 20 hours per week for each channel licensed to them. However, we agree that such licensees should be permitted to load the 20-hour per channel per week programming on fewer than all of the channels authorized. With respect to the minimum recapture requirement, ITFS licensees should be required to retain the right, upon one-year's notice to transmit multiple programs simultaneously over any MDS or ITFS channel in their systems.

As referenced in the compromise, we submit that compliance with these terms should establish that the applicant/licensee has established need for its channels under the FCC Rule Section 74.902(d), and should entitle the applicant/licensee to an initial or renewed license. Further, no demerit should be given to an applicant proposing channel loading which is also engaged in a comparative selection process. Finally, the compromise should not serve as a basis for future efforts to seek reallocation of non-loaded ITFS spectrum for commercial use.

Respectfully submitted,

COLEMAN INDEPENDENT SCHOOL DISTRICT

BY: 
Dr. Arthur C. Casey, Jr.
Superintendent of Schools