

CONNECTIVITY FOR LEARNING COALITION

July 18, 1997

Ex-Parte
Docket No. 93-61The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street
Washington, D.C. 20554**RECEIVED**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Hundt:

More than two years ago, the Connectivity for Learning Coalition, composed of education and library organizations, filed a Petition for Reconsideration in the LMS proceeding, Docket No. 93-61. The Coalition recognized the significant value of having affordable wireless technology in the classroom and the local library. The FCC, in the universal service proceeding earlier this year recognized that without a wireless alternative, schools may find it impossible to connect classrooms to the Internet. Therefore, the members of the Connectivity for Learning Coalition urge the FCC to adopt final rules in the LMS proceeding which will ensure affordable and reliable access to wireless Part 15 services for schools and libraries. Part 15 devices must be allowed to operate at full power at an antenna height of up to 15 meters if schools and libraries are to fully benefit from the technology.

Wiring schools and libraries represents a massive expense, particularly for older buildings. Wiring costs are estimated to be billions of dollars. Wireless technology can be an affordable and reliable option to connect schools and libraries. The new height and power requirements outlined in the FCC's report and order will limit the further development of low-cost wireless options, thereby limiting schools and libraries' ability to take advantage of the technology.

For example, in the case of Metricom's Ricochet wireless service, height and power limitations effect the pole top radios that comprise the network that connects the wireless modems to the Internet. If the pole top radios have to operate at reduced power, more pole top radios will be required, therefore, raising the cost of the service. Height and power limitations also threaten the efficiency and reliability of the network which is now being used by teachers in the San Francisco Bay area, Seattle and Washington, D.C.

These limitations were proposed to minimize interference, however the effect of the limitations is to make Part 15 devices a less attractive option for schools and libraries.

If the FCC is unable to allow operation of Part 15 devices at full power at an antenna height of 15 meters, then it is essential that the FCC extend to Part 15 devices serving as “final links” to schools and libraries the same exemption from power and height limitations given to public safety and medical uses.

The Connectivity for Learning Coalition urges you to support rules in the LMS proceeding which will ensure that wireless technology is both accessible and affordable for schools and libraries.

Thank you.

Sincerely,

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