

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Parts 1, 21, and 74 to Enable )  
Multipoint Distribution Service )  
and Instructional Television Fixed )  
Service Licensees to Engage in Fixed )  
Two-Way Transmissions )

MM Docket No. 97-217

COMMENTS OF THE  
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

The National Telephone Cooperative Association ("NTCA") submits the following comments in response to the Commission's *Notice of Proposed Rulemaking*, ("NPRM") in this docket (FCC 97-360), released on October 10, 1997, inviting comments to a proposal to permit Multipoint Distribution Services ("MDS") to provide two-way communications services in a manner that fully incorporates the concept of two-way transmission.

NTCA is a national association of approximately 500 local exchange carriers ("LECs"). These LECs provide telecommunications services to end users and interexchange carriers throughout rural America. NTCA also has members that are MDS providers.

DISCUSSION

NTCA supports the proposed rule change. The Commission relies on Section 257 of the Telecommunications Act of 1996 which requires it to identify and eliminate market entry barriers for entrepreneurs and other small businesses, to promote diversity of media voices, vigorous economic competition, technological advancement and promotion of the public interest. It also believes that the change will promote competition. NTCA agrees that the inability to utilize

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MDS spectrum for two-way communications is one such barrier that needs to be eliminated. The rule change would benefit the consumer by increasing competition and also benefit educational institutions by permitting them to use the frequencies for service such as high speed Internet. Further, in view of the flexibility accorded other spectrum licensees, there is no justification for restricting MDS spectrum. For these reasons, NTCA supports the use of MDS for two-way communications services.

### CONCLUSION

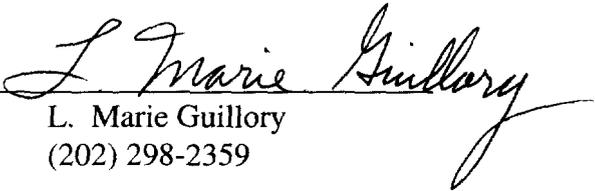
There is no compelling reason why MDS should not be opened up to two-way communications. It would enhance competition by allowing MDS operators to provide comparable competitive services, provide benefits to the educational community, and facilitate the most efficient use of the affected spectrum.

Respectfully submitted,

NATIONAL TELEPHONE COOPERATIVE  
ASSOCIATION

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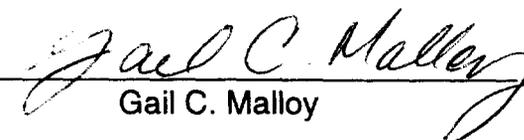
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January 8, 1998

CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Comments of the National Telephone Cooperative Association in MM Docket No. 97-217 was served on this 8th day of January 1998, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list:

  
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